STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT APPLICATION



FINAL ENVIRONMENTAL IMPACT REPORT VOLUME III - RESPONSES TO COMMENTS



OCTOBER 6, 2000

FINAL Environmental Impact Report Volume III - Responses to Comments

STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT APPLICATION STATE CLEARING HOUSE NUMBER 1999112107

PREPARED FOR: SANTA CLARA COUNTY DEPARTMENT OF PLANNING AND DEVELOPMENT

PREPARED BY: PARSONS 2101 WEBSTER STREET, SUITE 700 OAKLAND, CALIFORNIA 94612



OCTOBER 6, 2000

TABLE OF CONTENTS

VOLUME III – FINAL EIR RESPONSES TO COMMENTS

9 FINAL EIR INTRODUCTION

9.1.	Organization of Document	9-1
9.2.	Public Review Process for the EIR	9-1

10 FINAL EIR SUMMARY TABLE

11 FINAL EIR MASTER RESPONSES

11.1	Introduction
11.2	List of Master Responses11-2

12 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR

12.1	Introduction
12.2	Use of Comment Summaries
12.3	List of Comment Letters
12.4	Oral Comments

13 CHANGES TO THE TEXT OF THE DRAFT EIR

14 MITIGATION MONITORING AND REPORTING PROGRAM

VOLUME IV – FINAL EIR APPENDICES

G Draft EIR Comment Letters

A state of the sta

FINAL EIR INTRODUCTION

9.1 ORGANIZATION OF DOCUMENT

9

The Final Environmental Impact Report (EIR) consists of the Draft EIR and appendices (A through F) in Volumes I and II, Responses to Comments, revised EIR Summary and Changes to EIR text in Volume III, and Comment Letter Appendix G in Volume IV.

This document is Volume III of the Environmental Impact Report for the Stanford University Draft Community Plan and General Use Permit Application. This volume contains six chapters, which present the responses to comments on the Draft EIR. The six chapters are:

• Chapter 9 – Final EIR Introduction

This chapter describes the organization of the document and summarizes the public review process for the Draft EIR.

- Chapter 10 Final EIR Summary Table This chapter presents changes in the summary of impacts and mitigation measures that was originally presented in the Summary Chapter of the Draft EIR.
- Chapter 11 Final EIR Master Responses This chapter presents responses addressing issues that were frequently cited in the comments on the Draft EIR, providing an overview of issues that were of importance to a number of comment authors.

• Chapter 12 - Responses to Comments Received on the Draft EIR This chapter includes individual responses to written and oral comments on the Draft EIR.

- Chapter 13 Changes to the Text of the Draft EIR This chapter includes any revisions to text of the Draft EIR based on comments received on the Draft EIR. Editorial revisions to the Draft EIR made by the County in response to comments are also shown in the Responses to Comments chapter.
- Chapter 14 Mitigation Monitoring and Reporting Program This chapter includes the description of the mitigation measures and identification of lead agency and implementing responsibilities.

9.2 PUBLIC REVIEW PROCESS FOR THE EIR

The public comment period for the Draft EIR began on June 23, 2000 with an announcement of the availability of the Draft EIR. The formal public comment period was closed on August 7, 2000. On August 3, 2000, a public hearing for the Draft EIR was held in the City of Palo Alto.

The Draft EIR was distributed to all those requesting copies; approximately 200 Draft EIRs were distributed to the public during the comment period. The Draft EIR was also made available to the public on the County's web site.

The County will hold several meetings to consider certification of the EIR. Meetings in front of the Planning Commission for a recommendation on certification will take place on October 18 and 19, 2000. Meetings in front of the Board of Supervisors to consider certification will take place on October 30 and 31, 2000. In order to certify the Final EIR, the County must find that:

- a) the Final EIR has been completed in compliance with CEQA; and
- b) the Final EIR was presented to the decision making body of the lead agency and that the decision making body reviewed and considered the information contained in the Final EIR prior to selection of a Project (CEQA Guidelines 15090).

If the County certifies the Final EIR, the County will make the final decision regarding the approval of the Community Plan and issuance of the General Use Permit to Stanford, and the Notice of Determination will be filed. At the time of considering approval of the General Use Permit, the County must consider the information presented in the Final EIR. Because the project has significant, unavoidable environmental impacts, the County must find that the benefits of the project outweigh the environmental effects before it may approve the project. This is called a Statement of Overriding Considerations and it must be included in the record of project approval (CEQA Guidelines 15093).

10 FINAL EIR SUMMARY TABLE

The Draft EIR Impacts and Mitigation Summary Table is included below. The summary table includes modifications to mitigation measures and changes to impact significance that have resulted from preparation of the Final EIR.

Table S-1

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
1. Land Use			
LU-1. Will the project increase potential for conflict as a result of incompatible land uses?	Less than Significant	No mitigation is necessary.	Less than Significant
2. Open Space, Recrea	tion and Visual Re	SOURCES	
OS-1. Will the project be inconsistent with the Santa Clara County General Plan regarding Scenic Routes, Scenic Approaches, or Scenic Highways?	Less than Significant	No mitigation is necessary.	Less than Significant
OS-2. Will the project result in the loss of recognized open space?	Significant	OS-2: Cluster Development in Lathrop Development District	Significant
OS-3. Will the project adversely affect recreational opportunities for existing or new campus residents and facility users?	Significant	OS-3: Improvement of Parks and Dedication of Trails	Less than Significant
OS-4. Will the project cause an adverse effect on foreground or middle ground views from a high volume travel way (excluding scenic routes and scenic highways), recreation use areas, or other public use areas?	Significant	OS-4: Protect Visual Quality Along El Camino Real	Less than Significant

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
OS-5. Will the project cause an adverse effect on foreground views from one or more private residences or significantly alter public views?	Less than Significant	No mitigation is necessary.	Less than Significant
OS-6. Will the project create a high intensity light source or glare affecting private residences, passing pedestrians, or motorists?	Significant	OS-6: Control Light and Glare	Less than Significant
OS-C1: Will the project combined with other cumulative projects be inconsistent with the Santa Clara County General Plan regarding Scenic Routes, Scenic Approaches, or Scenic Highways?	Less than Significant	No mitigation is necessary.	Less than Significant
OS-C2: Will the project combined with other cumulative projects result in the cumulative loss of recognized open space?	Significant	OS-2: Cluster Development in Lathrop Development District	Significant
OS-C3: Will the project combined with other cumulative projects adversely affect recreational opportunities?	Significant	OS-3: Improvement of Parks and Dedication of Trails	Less than Significant

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
OS-C4: Will the project together with other cumulative projects cause an adverse effect on foreground or middle ground views from a high volume travel way (excluding scenic routes and scenic highways), recreation use areas, or other public use areas?	Significant	OS-4: Protect Visual Quality Along El Camino Real	Less than Significant
OS-C5: Will the project along with other cumulative projects cause an adverse effect on foreground views from one or more private residences or significantly alter public views?	Less than Significant	No mitigation is necessary.	Less than Significant
OS-C6: Will the project along with other cumulative projects create a high intensity light source or glare affecting private residences, passing pedestrians, or motorists?	Significant	OS-6: Control Light and Glare	Less than Significant
3. Population and House	sing		
PH-1: Will the project result in a net loss, through conversion or demolition, of homes occupied by low- or moderate-income households?	No Impact	No mitigation is necessary.	Less than Significant
PH-2: Will the project result in a net loss, through conversion or demolition, of multifamily rental housing?	No Impact	No mitigation is necessary.	Less than Significant

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
PH-3: Will the project increase the demand for housing thereby causing indirect environmental impacts?	Significant	PH-3: Identify Additional Housing Sites and Condition New Academic Space on the Construction of Housing	Less than Significant
PH-C1&2: Will the project have a cumulative potential to result in a net loss of homes occupied by low- or moderate-income households or a net loss of multifamily rental housing?	No Impact	No mitigation is necessary	Less than Significant
PH-C3: Will the project plus cumulative projects increase the demand for housing thereby causing indirect environmental impacts?	Significant	PH-3: Identify Additional Housing Sites and Condition New Academic Space on the Construction of Housing	Less than Significant
4. Traffic and Circulation	on		
TR-1: Transit. Will the project adversely affect public transit service levels or accessibility?	Less than Significant	No mitigation is necessary.	Less than Significant
TR-2: Bicycle and/or Pedestrian. Will the project cause adverse impacts on the use of bicycle and/or pedestrian travel ways?	Less than Significant	No mitigation is necessary.	Less than Significant
TR-3: Parking. Will the project create adverse impacts to existing parking or access to existing parking?	Less than Significant	No mitigation is necessary.	Less than Significant
TR-4: Vehicular Impacts – Freeways. Will the project create adverse vehicular impacts on the freeways?	Less than Significant	No mitigation is necessary.	Less than Significant

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
TR-5: Vehicular Impacts – Intersections. Will the	Significant	TR-5A: Tier 1 Intersection Capacity Expansion	Significant
project create adverse		TR-5B: Trip Reduction and Monitoring	
intersections in Palo Alto,		TR-5C: Cooperative Trip Reduction	
Santa Clara County, and Menlo Park?		TR-5D: Intersection Capacity Expansion	
TR-6: Residential Streets. Will the project result in	Significant	TR-6A: Reduce Cut Through Traffic on Residential Streets	Less than Significant
traffic impacts to surrounding residential neighborhoods?		TR-6B: Require Site-Specific Traffic Studies for Large GUP Projects	
TR-7: Construction. Will the project create	Significant	TR-7A: Off-street Parking for Construction Related Vehicles	Less than Significant
additional construction traffic causing a		TR-7B: Maintenance of Pedestrian Access	
substantial reduction in access to land uses or a		TR-7C: Maintenance of Bicycle Access	
reduction in mobility?		TR-7D: Restriction on Construction Hours	
		TR-7E: Construction Truck Routes	
		TR-7F: Protection of Public Roadways During Construction	
		TR-7G: Protection and Maintenance of Public Transit Access and Routes	
		TR-7H: Construction Impact Mitigation Plan (Alternate Mitigation)	
		TR-7I: Construction During Special Events	
5. Hydrology and Wate	r Quality		
HWQ-1: Surface Water Hydrology. Will the project cause increased	Significant	HWQ-1: Manage Stormwater Runoff	Less than Significant

runoff due to creation of impervious surfaces?			
HWQ-2: Groundwater. Will the project reduce groundwater quantity?	Significant	HWQ-1: Manage Stormwater Runoff HWQ-2: Maintain Groundwater Recharge	Less than Significant

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
HWQ-3: Groundwater. Will the project degrade groundwater quality?	Significant	HWQ-3: Protect Water Quality	Less than Significant
HWQ-4. Surface Water Quality. Will the project result in a degradation of surface water runoff quality?	Significant	HWQ-3: Protect Water Quality HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution	Less than Significant
HWQ-C1: Will the project have a cumulative potential to impact surface water hydrology, groundwater quantity, groundwater quality or surface water quality?	Significant	 HWQ-1: Manage Stormwater Runoff HWQ-2: Maintain Groundwater Recharge HWQ-3: Protect Water Quality HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution 	Less than Significant
6. Geology and Seismi	city		
G&S-1: Will project facilities be damaged by ground surface rupture?	Less than Significant	No mitigation is necessary.	Less than Significant
G&S-2: Will earthquake- induced strong ground shaking damage project facilities?	Less than Significant	No mitigation is necessary.	Less than Significant
G&S-3: Will project facilities be damaged by co-seismic ground deformation?	Less than Significant	No mitigation is necessary.	Less than Significant
G&S-4: Will project facilities be damaged by liquefaction or settlement during an earthquake?	Less than Significant	No mitigation is necessary.	Less than Significant
G&S-5: Will project facilities be damaged by unstable slope conditions?	Less than Significant	No mitigation is necessary.	Less than Significant
G&S-6: Will project facilities be exposed to damage due to expansive soils or soils with moderate to high erosion potential?	Less than Significant	No mitigation is necessary.	Less than Significant

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
7. Hazardous Materials			
PHS-1: Will the Project provide safeguards to protect the public from exposure to hazardous materials at concentrations detrimental to human health?	Significant	PHS-1: Risk Management Plan	Less than Significant
PHS-2: Will the Project provide safeguards to protect the public from exposure to hazardous waste at concentrations detrimental to human health?	Less than Significant	No mitigation is necessary.	Less than Significant
PHS-C1: Will the project plus cumulative projects provide safeguards to protect the public from exposure to hazardous materials and wastes at concentrations detrimental to human health?	Significant	PHS-1: Risk Management Plan	Less than Significant
8. Biological Resources	S		
BIO-1: Will the project cause a loss of individuals or occupied habitat of endangered, threatened, or rare wildlife or plant species?	Significant; California Tiger Salamander	BIO-1(a) through (e) - Option 1: CTS Mitigation Program Proposed by Stanford	Option 1 – Significant
		BIO-1(a) through (e) - Option 2: Alternative CTS Mitigation Program (not proposed by project applicant)	Option 2 – Less than Significant
		BIO-1 (a) through (e) - Option 3: Federal and State Alternative CTS Mitigation Program (proposed by the United States Fish & Wildlife Service and California Department of Fish and Game)	<u>Option 3 – Less</u> <u>than Significant</u>

.

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
	No Impact; Steelhead and California red- legged frog	No mitigation is necessary.	Less than Significant
	Potentially Significant; Rare, Threatened, and Endangered Plants	BIO-1(f) through (k): Rare, Threatened, and Endangered Plant Protection Program	Less than Significant
	Less than Significant; American Peregrine Falcon and Willow Flycatcher	No mitigation is necessary.	Less than Significant
BIO-2: Will the project cause a loss of individuals of CNPS List 3 or 4 plant species?	Significant	BIO-1(f) through (k): Rare, Threatened, and Endangered Plant Protection Program	Less than Significant
BIO-3: Will the project cause a loss of active raptor nests, migratory bird nests, or native wildlife nursery sites?	Significant	BIO-3: Pre-Construction Raptor Surveys	Less than Significant
BIO-4: Will the project cause a permanent net loss of habitat for sensitive wildlife species?	Less than Significant	No mitigation is necessary.	Less than Significant
BIO-5: Will the project cause a permanent loss of sensitive native plant communities?	Significant	BIO-5: Replacement of Oak Woodland and Riparian Oak Woodland	Less than Significant
BIO-6: Will the project substantially block or disrupt wildlife migration	Significant	BIO-1(a) through (e) - Option 1: CTS Mitigation Program Proposed by Stanford	Less than Significant
or travel corridors?		BIO-1(a) through (e) - Option 2: Alternative CTS Mitigation Program (not proposed by project applicant)	

÷.

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
BIO-7: Will the project conflict with the County's tree preservation ordinance?	Significant	BIO-7: Planting of Replacement Trees	Less than Significant
BIO-8: Will the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less than Significant	No mitigation is necessary.	Less than Significant
BIO-9: Will the project result in a net loss of wetlands or other waters of the U.S.?	Significant	BIO-9: Wetland Avoidance and Replacement	Less than Significant
BIO-C1 through BIO-C3, BIO-C7, and BIO-C8: Will the project impact sensitive biological resources based on evaluation criteria 1 through 3, 7, and 8?	Significant	 BIO-1(a) through (e) - Option 2: Alternative CTS Mitigation Program (not proposed by project applicant) BIO-1(f) through (k): Rare, Threatened, and Endangered Plant Protection Program BIO-3: Pre-Construction Raptor Surveys BIO-7: Planting of Replacement Trees 	Less than Significant
BIO-C4: Will the project, combined with other cumulative projects, cause a permanent loss of habitat for sensitive wildlife species?	Less than Significant	No mitigation is necessary	Less than Significant
BIO-C5: Will the project, combined with other cumulative projects, cause a permanent loss of sensitive native plant communities?	Significant	BIO-5: Replacement of Oak Woodland and Riparian Oak Woodland	Less than Significant

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
BIO-C6: Will the project, combined with other cumulative projects, substantially block or disrupt wildlife migration or travel corridors?	Significant	BIO-1(a) through (e) - Option 2: Alternative CTS Mitigation Program (not proposed by project applicant)	Less than Significant
BIO-C9: Will the project, combined with other cumulative projects, result in a net loss of wetlands or other waters of the U.S.?	Significant	BIO-9: Wetland Avoidance and Replacement	Less than Significant
9. Historic and Archaeo	logical Resources	; 	
HA-1: Will the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?	Significant	HA-1: Protection of Historic Resources	Significant
HA-2: Will the project cause a substantial adverse change in the significance of an archaeological resource as defined in Public Resources Code 21083.2?	Significant	HA-2: Protection of Known and Previously Undiscovered Archaeological Resources	Less than Significant
HA-3: Will the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Significant	HA-3: Protection of Undiscovered Paleontological Resources	Less than Significant
HA-4: Will the project disturb any human remains, including those interred outside of formal cemeteries?	Significant	HA-2: Protection of Known and Undiscovered Archaeological Resources	Less than Significant

: •1

•

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
HA-C1: Will the project combined with cumulative projects have a potential to disturb historical resources?	Significant	HA-1: Protection of Historic Resources	Significant
HA-C2-4: Will the project combined with cumulative projects have a potential to disturb archaeological, unique geological, or paleontological resources, or human remains?	Significant	Archaeological Resources HA-2: Protection of Known and Undiscovered Archaeological Resources <u>Unique Geologic, Paleontological</u> <u>Resources and Human Remains</u> No mitigation is necessary.	Less than Significant
10. Public Services and	Utilities		
PS-1: Will the project increase demand for police, fire, water, power, sewage treatment and disposal, or solid waste removal to such a degree that accepted service standards are not maintained?	Significant; Police Significant; Fire Significant; Water Significant; Wastewater Less than Significant; Solid Waste	 PS-1A: Maintain Police Services PS-1B: Maintain Fire Services PS-1C: Water Conservation and Recycling PS-1D: Improve the Wastewater Collection System No mitigation is necessary. 	Less than Significant Less than Significant Less than Significant Less than Significant Less than Significant
	Less than Significant; Electrical Power	No mitigation is necessary.	Less than Significant
PS-2: Will the project create a demand for additional school capacity that cannot be met by existing or planned capacity?	Significant	PS-2: Payment of Statutory School Impact Fees	Less than Significant

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
PS-C1: Will the project, combined with other cumulative projects, increase demand for police, fire, water, power, sewage treatment and disposal, or solid waste removal to such a degree that accepted service standards are not maintained?	Significant	 PS-1A: Maintain Police Services PS-1B: Maintain Fire Services PS-1C: Water Conservation and Recycling PS-1D: Improve the Wastewater Collection System 	Less than Significant
PS-C2: Will the project, together with other cumulative projects, create a demand for additional school capacity that cannot be met by existing or planned capacity?	Significant	PS-2: Payment of Statutory School Impact Fees	Less than Significant
11. Air Resources		-	
AQ-1: Will there be inadequate mitigation for potential construction- period emissions?	Significant	AQ-1: Reduce Diesel Emissions	Less than Significant
AQ-2: Will the project produce local CO concentrations that exceed federal and state standards?	Less than Significant	No mitigation is necessary.	Less than Significant
AQ-3: Is the project inconsistent with emission growth factors contained in any BAAQMD air plans or does it result in an emissions increase greater than the listed significance thresholds?	Less than Significant	No mitigation is necessary.	Less than Significant
AQ-4: Will the project create objectionable odors?	Less than Significant	No mitigation is necessary.	Less than Significant

N

4

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance		
AQ-5: Will the project significantly alter air movement, moisture, or temperature, or change in climate, either locally or regionally?	Less than Significant	No mitigation is necessary.	Less than Significant		
AQ-6: Will the project expose sensitive receptors or the general public to substantial levels of toxic air contaminants?	Less than Significant	No mitigation is necessary.	Less than Significant		
AQ-C1: Will the project have significant cumulative air quality impacts?	Less than Significant	AQ-1 Reduce Diesel Emissions	Less than Significant		
12. Noise					
NOISE-1: Will construction of the project expose the public to high noise levels?	Significant	NOISE-1: Reduce Construction Noise	Significant		
NOISE-2: Will operation of the project expose the public to high noise levels?	Significant	NOISE-2: Provide for Noise Reduction Designs	Less than Significant		
NOISE-3: Will operation of the project expose the public to high traffic noise levels?	Less than Significant	No mitigation is necessary.	Less than Significant		
NOISE-4: Will vibration from project construction cause any disturbance?	Less than Significant	No mitigation is necessary.	Less than Significant		
NOISE-C1: Will construction of the project combined with other nosie sources expose the public to high cumulative noise levels?	Significant	No mitigation is possible.	Significant		
NOISE-C2: Will operation of the project expose the public to high cumulative noise levels?	Less than Significant	NOISE-2: Provide for Noise Reduction Designs	Less than Significant		

.

Impact and Mitigation Summary

Impact	Pre-Mitigation Significance	Mitigation Measure	Post-Mitigation Significance
NOISE-C3: Will operation of the project expose the public to high cumulative traffic noise levels?	Less than Significant	No mitigation is necessary.	Less than Significant
NOISE-C4: Will vibration from project construction plus cumulative projects cause any disturbance?	Less than Significant	No mitigation is necessary.	Less than Significant
Chapter 5 - Growth Indu	ucing Impacts		
GI-1: Will the project induce growth or concentration of population thereby leading to indirect impacts on the physical environment?	<u>Significant</u>	<u>GI-1: Identify Additional Housing Sites</u> and Implement Traffic and Service <u>Mitigation Measures</u>	<u>Significant</u>
GI-2: Will the provision of infrastructure improvements associated with the project stimulate population and housing growth beyond that projected in the Palo Alto Comprehensive Plan or the Santa Clara County General Plan	<u>Less than</u> <u>Significant</u>	<u>No mitigation is necessary.</u>	<u>Less than</u> <u>Significant</u>
GI-C1: Will the project, along with other projects in the vicinity create cumulative growth inducing impacts?	<u>Significant</u>	No further mitigation is feasible.	<u>Significant</u>

Source: Parsons, 2000

. •

E .

11 FINAL EIR MASTER RESPONSES

11.1 INTRODUCTION

Review of the comments made on the Draft EIR showed that some comments were made frequently, demonstrating a common concern that was widespread among both those submitting written comments and those speaking at the public hearing. In some cases the array of similar comments about a particular topic provided a clearer picture of a particular suggested alternative, technical concern, or procedural issues than was provided by any single comment. To allow presentation of a response that addresses all aspects of these related comments, Master Responses have been prepared for those topics that were raised in a number of comments from agencies and members of the public. These Master Responses are intended to allow a well-integrated response addressing all facets of a particular issue, in lieu of piece-meal responses to each individual comment, which may not have portrayed the full complexity of the issue. The use of a Master Response is in no way intended to minimize the importance of the individual comments. In fact, Master Responses were used as a way to highlight some of those issues that appeared to be of particular importance to those making comments.

11.2 LIST OF MASTER RESPONSES

- MR-1 Statements for or Against the Project or Project Components
- MR-2 Reduced Project Alternative
- MR-3 Intensified Development Alternative
- MR-4 Alternative Housing Sites
- MR-5 Project Conformity with Palo Alto Urban Service Area Boundary
- MR-6 Recreational and Open Space Impacts of Golf Course Redesign
- MR-7 Biological Impacts of Golf Course Redesign
- MR-8 Historical Significance of Golf Course
- MR-9 Additional Open Space Protection
- MR-10 Community Plan Description of Density and Intensity of Development
- MR-11 California Tiger Salamander Mitigation Measures

MR-1 STATEMENTS FOR OR AGAINST THE PROJECT OR PROJECT COMPONENTS

Comment Summary: In many cases, comments include an opinion opposing specific components of the proposed CP/GUP.

Response Summary: Comments regarding selection of a Project are not comments on the Draft EIR, but comments on the approval of the CP/GUP, which will occur after the EIR is certified. The EIR has evaluated a wide range of options that are available for inclusion as part of the CP/GUP.

A Final EIR need only respond to significant environmental issues raised in comments on the Draft EIR. Comments about components of the CP/GUP or the merits of or need for the project have no bearing on the adequacy of the EIR. However, these recommendations for or against a particular project component are valuable input to the process of defining the Community Plan and the conditions for approval of General Use Permit. These comment letters have been forwarded to the Santa Clara County Planning Commission and Board of Supervisors. If this Final EIR is certified, the Planning Commission and Board will consider the recommendations in these comment letters as well as the information presented in the EIR, in making its decision regarding approval of the project.

Several comments have asked that the County consider approving a modified version of the project proposed by Stanford. Many of these proposed modifications to the Community Plan and General Use Permit raise policy matters that will be addressed by the Planning Commission and Board of Supervisors, but are not CEQA issues because the requested modifications do not present substantially different alternatives than those studies in the EIR. A wide range of project modifications that could reduce significant environmental impacts has been studied in the EIR. This has been accomplished both by studying a reduced project alternative under which half of the academic facilities and half of the proposed housing units would be constructed, and by studying numerous alternatives to individual components of the Community Plan and General Use Permit, which could be combined in literally hundreds of permutations. Other changes to the project components could be made as well, and the environmental effects of these changes would be within the range of potential effects identified in the EIR. From an environmental perspective, a broad range of potential environmental effects of modifying the project and its components has been disclosed.

The final approved project may include some of these alternative components that were developed by County staff. Refer to Sections 7.4 and 7.6 of the Draft EIR for the list of alternative components that were analyzed and those that were identified in the Environmentally Superior Alternative. These alternative components were picked to provide for a reasonable range of alternatives that could feasibly achieve the Project Objectives.

MR-2 REDUCED PROJECT ALTERNATIVE

Comment Summary: Several comments requested more detailed evaluation of the reduced project alternative, and expressed the belief that this alternative should have fewer environmental effects than the proposed project. Some comments requested evaluation of a revised Reduced Project Alternative that includes all of Stanford's proposed housing, but only half of the academic development.

Response Summary: The Reduced Project Alternative does have a lesser level of impacts than the proposed project, and the Draft EIR identifies that fact. However, impacts are reduced more effectively by the adoption of alternative components that modify the Community Plan to set limits on the location of development. Because the Reduced Project does reduce some impacts, the County has determined that it should be included in the Environmentally Superior Alternative.

Section 15125.6(a) of the CEQA Guidelines specifically focuses the analysis of alternatives on identification of those alternatives that can "avoid or substantially lessen any of the significant effects of the project". The proposed project is projected to result in significant unavoidable adverse impacts in the areas of traffic, open space, historic resources, construction noise, and growth inducement. The Reduced Project Alternative, which includes half of the academic facilities and half of the housing facilities proposed in the GUP application, does reduce some impacts as compared to the proposed project, but many of the impacts are similar to the proposed project.

The Draft EIR also evaluated alternative "components" of the project, which reduced the impacts of development by relocating proposed development away from areas of concern, rather than reducing the total amount of development. The purpose of this approach was to provide the opportunity to select a combination of project options that would best meet the County's purposes and the applicant's objectives, and would reduce environmental impacts.

A variation of the reduced project alternative, which included all proposed housing and half of the proposed academic development, was also suggested for analysis in comments on the Draft EIR. Each issue area for which significant project impacts were identified is discussed below for both the Reduced Project alternative, and for the half academic/all housing alternative proposed in comments on the Draft EIR.

Draft EIR Reduced Project Alternative (Half Housing, Half Academic Development)

This discussion expands on the impacts of the Reduced Project Alternative as defined in the Draft EIR, with half of the academic facilities and half of the housing facilities proposed in the CP/GUP, as well as approximately half of the population increase. As requested in comments, this response reiterates and provides further details regarding the basis for the impact-by-impact comparison in Table 7-2 of the Draft EIR.

Traffic

The comparison of impacts presented in Table 7-2 of the Draft EIR identifies the fact that the Reduced Project could reduce impacts at some study area intersections. Some intersection impacts would be reduced to less than significant (see Table 11-1). Impacts to residential neighborhoods would be reduced, and construction traffic would be lessened. However, because of projected background traffic growth, there would still be some significant impacts to traffic even with the Reduced Project Alternative. Significant impacts at intersections are summarized as follows:

- Impact during the AM peak at Willow/Middlefield is eliminated. However, the intersection will still require mitigation during the PM peak with the reduced project alternative.
- Impact during the PM peak at Arboretum/Palm is eliminated. However, the intersection will still require mitigation during the AM peak hour.
- Impact during the PM peak at El Camino Real/Churchill is eliminated. This impact is due to the proposed arena and theater, and would not occur with the proposed project without the arena and theater.

All other intersection impacts identified as significant would remain significant, and therefore, all mitigation measures would remain the same, except for El Camino Real/Churchill.

Open Space

Open space impacts of the proposed project are a result of the Community Plan's proposal to change land use designation of the Golf Course and proposed Lathrop District from Academic Reserve and Open Space to Academic Campus. The significant impact results from the change in designation, not the overall intensity of development proposed in the GUP. The Reduced Project, as defined, does not change the proposed Community Plan designations, but only revises the total amount of development to be allowed under the GUP. Because it is not known at this time where specific development projects will be proposed, it is not possible to determine whether reducing overall development would alter open space impacts, although that is a possibility. Future development of areas that are currently open space and are being proposed for designation as Academic Campus would still be allowed. Therefore, the Reduced Project Alternative does not change this impact. However, alternative components were identified that would not involve a change to an Academic Campus designation for the Lathrop area, except for those areas that are currently developed with structures. These alternative components do avoid the significant impacts of the proposed project on open space.

1

Intersection Level of Service – Comparison of Year 2010 Scenarios For Reduced Project Alternative

		Year 2010								
Intersection	Peak Hour	N	o Proje	ect	With F Arena	Project v a and Tl	vithout neater	Red A	uced P liternat	roject ive
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay
El Camino Real / Valparaiso	AM	D	0.879	32.1	E	1.027	42.0	Ε	1.00	42.0
	PM	F	1.091	69.3	F	1.109	77.2	F	1.10	73.5
El Camino Real / Santa Cruz	AM	С	0.815	16.3	C	0.819	16.4	C	0.818	15.7
	PM	С	0.93	22.6	С	0.952	24.1	C	0.941	22.6
El Camino Real / Ravenswood	AM	F	1.136	100	F	1.140	102.4	F	1.139	101.6
	PM	F	1.255	176	F	1.269	187.1	F	1.262	181.8
El Camino Real / Roble	AM	В	0.604	6.7	В	0.607	6.7	В	0.606	6.7
	PM	В	0.701	13.6	В	0.711	14.0	C	0.707	14.3
El Camino Real / Middle	AM	C	0.897	23.3	D	0.940	23.5	C	0.877	21.2
	PM	F	1.157	104	F	1.161	105.4	F	1.159	104.7
El Camino Real / Cambridge	AM	В	0.819	14.6	В	0.822	14.6	В	0.821	14.6
	PM	В	0.821	13.7	B	0.824	13.8	В	0.791	13.3
El Camino Real / Sand Hill / Alma	AM	D	0.811	26.7	D	0.815	26.9	D	0.813	26.8
	PM	F	1.077	71.9	F	1.086	75.5	F	1.082	73.9
El Camino Real / Shopping Center	AM	F	N/A	54.2	F	N/A	55.3	F	N/A	54.9
	PM	F	N/A	63.4	F	N/A	66.4	F	N/A	65.2
El Camino Real / Quarry	AM	В	0.438	10.2	В	0.440	10.2	B	0.439	10.2
	PM	D	0.708	25.5	D	0.710	25.6	D	0.709	25.5
El Camino Real / Palm / University	AM	E	1.032	51.9	E	1.046	54.9	E	1.040	53.2
	PM	F	1.163	104.5	F	1.210	126.7	F	1.185	112.8
El Camino Real / PAMF Entrance	AM	Α	0.441	4.5	A	0.443	4.5	A	0.442	4.5
	PM	C	0.645	15.3	C	0.648	15.3	C	0.647	15.3
El Camino Real / Embarcadero	AM	D	0.923	39.2	D	0.928	39.7	D	0.927	39.7
	PM	E	0.91	40.3	E	0.915	40.7	E	0.913	40.6
El Camino Real / Churchill Ave	AM	D	0.796	25.1	D	0.798	25.1	D	0.797	25.1
	PM	D	0.985	39	D	0.989	39.7	D	0.987	39.4
El Camino Real /Serra	AM	C	0.626	15.7	C	0.635	16.0	C	0.631	15.9
	PM	C	0.777	18.2	C	0.788	18.6	C	0.783	18.4
El Camino Real /Stanford	AM	D	0.969	39.1	E	0.984	41.7	E	0.978	40.7
···· · · ·	PM	E	1.019	41.5	E	1.048	50.1	E	1.035	46.0

Intersection Level of Service – Comparison of Year 2010 Scenarios For Reduced Project Alternative

		Year 2010								
Intersection	Peak Hour	N	No Project		With F Arena	Project v a and Tl	without heater	Red A	uced P	roject ive
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay
El Camino Real / California	AM	С	0.699	18.0	C	0.704	18.1	C	0.702	18.1
	PM	C	0.745	16.5	C	0.764	17	С	0.755	16.7
El Camino Real / Page Mill	AM	F	1.072	76.3	F	1.078	78.4	F	1.076	77.7
	PM	E	0.988	48.2	E	1.002	50.9	E	0.996	49.6
University / Woodland	AM	D	0.794	28.2	D	0.798	28.3	D	0.797	28.3
	PM	D	0.649	33.3	D	0.668	33.7	D	0.659	33.5
Middlefield Road/University Ave	AM	C	0.769	20.1	C	0.781	20.7	С	0.774	20.5
	PM	E	1.027	45.9	E	1.068	58.2	Ε	1.049	52.2
Middlefield / Willow	AM	D	0.778	31.0	D	0.78	31.0	D	0.779	31.0
	PM	F	1.051	72.6	F	1.057	74.5	F	1.054	73.4
Middlefield / Embarcadero	AM	C	0.702	18.5	C	0.703	18.5	C	0.702	18.5
	PM	D	0.927	26.5	D	0.930	26.8	D	0.929	26.7
Alma Street / Churchill Avenue	AM	E	0.944	47.9	E	0.945	48.1	E	0.944	48.0
	PM	E	1.024	53.1	E	1.027	53.9	E	1.025	53.5
Junipero Serra / Page Mill	AM	F	1.094	91.1	F	1.096	92.1	F	1.096	91.8
	PM	F	1.276	190.8	F	1.306	214.3	F	1.292	203.6
Junipero Serra Blvd./Stanford Ave	AM	C	0.77	16.2	С	0.782	16.7	C	0.778	16.5
	PM	Е	0.992	49.5	E	1.078	57.6	E	1.005	54.0
Junipero Serra/Campus Drive East	AM	C	0.564	16.5	C	0.573	17	C	0.570	16.8
	PM	C	0.698	23.0	C	0.718	23.8	В	0.708	13.8
Junipero Serra / Campus Drive West	AM	F	0.966	71.4	F	0.974	75.4	F	0.972	74.4
	PM	F	1.218	187.8	F	1.268	233.4	F	1.246	211.2
Junipero Serra / Alpine / Santa Cruz	AM	F	1.252	167.6	F	1.264	176.7	F	1.261	174.5
	PM	F	1.15	106.0	F	1.167	115.9	F	1.160	110.6
Sand Hill / Sand Hill Circle / I-280	AM	F	1.083	79.3	F	1.090	82.3	F	1.087	81.2
	PM	F	1.159	101.2	F	1.175	110.6	F	1.168	106.4
Sand Hill / Sharon Park	AM	В	0.858	11.1	В	0.861	11.3	В	0.86	11.2
	PM	C	0.928	15.7	C	0.942	16.6	С	0.935	16.1
Sand Hill / Santa Cruz	AM	F	1.066	73.3	F	1.077	76.7	F	1.073	75.2
	PM	F	1.206	154.4	F	1.282	210.5	F	1.271	194.6

7

.

Intersection Level of Service – Comparison of Year 2010 Scenarios For Reduced Project Alternative

		Year 2010								
Intersection	Peak Hour	No Project With Project without Redu Arena and Theater Alt			uced P Iternat	Iced Project				
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay
Sand Hill / Oak	AM	F	1.356	245.2	F	1.357	245.8	F	1.357	245.8
	PM	F	1.337	225	F	1.340	228.1	F	1.339	227.0
Sand Hill / Oak Creek / Stockfarm	AM	C	0.821	15.3	С	0.821	15.3	C	0.821	15.3
	PM	В	0.751	10.9	В	0.752	10.9	В	0.751	10.9
Sand Hill / Pasteur	AM	C	0.646	16.3	C	0.647	16.4	C	0.646	16.3
	PM	D	0.743	26.0	D	0.744	26.1	D	0.744	26.1
Sand Hill / Arboretum	AM	E	0.941	42.8	E	0.945	43.3	E	0.944	43.2
	PM	F	1.006	65.4	F	1.011	67.4	F	1.009	66.7
Arboretum / Quarry	AM	C	0.67	20.1	С	0.682	20.3	C	0.679	20.2
	PM	E	0.976	47.3	Е	1.011	46.5	E	0.997	43.5
Arborertum Road/Palm Drive	AM	E	1.026	59.2	F	1.047	65.2	F	1.040	63.2
	PM	D	0.912	37.0	Ε	0.945	41.5	D	0.932	39.6
Arboretum / Galvez	AM	В	0.741	9.7	В	0.755	10.1	В	0.751	10.0
	PM	В	0.636	9.6	B	0.659	9.9	В	0.650	9.7
Welch / Pasteur southbound	AM	В	0.273	7.7	В	0.278	7.7	В	0.277	7.7
	PM	В	0.354	12.1	В	0.368	12.2	В	0.362	12.2
Welch / Pasteur northbound	AM	В	0.218	9.8	В	0.223	9.8	В	0.221	9.8
	PM	В	0.606	12.4	В	0.627	12.7	В	0.618	12.6
Welch Road / Quarry Road	AM	C	0.576	17.0	C	0.587	17.3	С	0584	17.2
	PM	C	0.61	17.5	C	0.632	17.9	C	0.624	17.7
Welch Road / Campus Drive West	AM	В	0.759	6.7	В	0.774	7.5	В	0.838	7.1
	PM	F	1.52	109.6	F	2.060	242.7	F	2.032	240.0
Pasteur / Blake/Wilbur	AM	B	1.217	5.0	В	1.243	5.6	A	1.237	4.1
	PM	B	1.335	7.3	В	1.384	9.2	В	1.363	8.8
Santa Cruz / University	AM	В	0.723	14.8	B	0.726	14.9	В	0.725	14.9
	PM	В	0.726	13.2	B	0.766	14.4	В	0.765	14.3

Note: Results shown in **bold** indicate a significant impact.

Historic Resources

Impacts of the proposed project are uncertain, because it is not known if historic resources might be demolished as part of Stanford's building program. Although there may be less chance of a loss of historic resources under the Reduced Project Alternative, it is still not possible to determine if construction would destroy any significant resources, or if alteration of resources would be permitted. This impact is thus still significant.

Construction Noise

With less construction at each individual building site or construction of fewer buildings, the overall duration of construction noise would likely be less than with the proposed project. Nevertheless, the Reduced Project does not eliminate construction in areas adjacent to residential locations outside the campus. Even with construction of a smaller number of units along Stanford Avenue (the Reduced Project includes 40 units at this location instead of 75), construction noise would have the potential to have significant impacts on adjacent residences on Stanford Avenue. However, alternative components were identified that would relocate some of the proposed housing sites away from adjacent residential locations.

Growth Inducing Impacts

The Reduced Project would reduce the amount of growth induced proportional to the reduction in jobs at the University. Although this alternative includes half of the additional academic square footage, it is not possible to correlate this directly with the number of jobs that would be produced. Elimination of the proposed arena and performing arts center would not result in a substantial reduction in new jobs. The total population increase at Stanford would be reduced from 2,201 new students, faculty and staff under the proposed project to 1,280. Assuming a proportional reduction in each category, this would result in 397 new students, 339 new hospital residents and postgraduates, and 544 new faculty and staff. This would reduce the number of new jobs created through the employment multiplier effect to 310 new jobs (using the multiplier of 0.57 secondary jobs for each new Stanford job), but given the existing shortage of housing in the area, the effect of this induced growth would still be expected to be significant.

Other Impacts

Table 7-2 in the Draft EIR identifies numerous other areas in which the Reduced Project would reduce impacts as compared to the proposed project:

- A reduced level of development would halve the number of faculty and staff homes that could be built at housing sites along JSB, thus reducing the potential for impacts to scenic routes.
- Visual impacts would be reduced because a reduced level of development (125 units instead of 250) would allow greater setbacks from El Camino Real.
- The demand for housing would be reduced by 921 units as compared to the proposed project.

- With less development there would be less potential for creation of impervious surface, but it is not possible to determine whether impervious surface would be reduced by about half or by much more or less. Much proposed development is infill, and would take place in areas that are already paved, so it is not possible to determine the extent to which impervious surface area would be changed with the Reduced Project. The following impacts associated with impervious surface would be reduced, but to an unknown extent:
 - Runoff would be less than with the proposed project, and the required volume of detention facilities would be smaller.
 - Potential reduction in groundwater recharge would be less than with the proposed project.
 - There would be less potential for degradation of groundwater quality.
 - There would be less potential for surface water quality impacts.
- Impacts to California tiger salamander would potentially be reduced because a lower level of development would make avoidance of CTS habitat more feasible.
- Less construction would reduce the potential for disruption of nesting birds.
- Less construction would reduce the potential for loss of sensitive plant communities.
- Reduced development would reduce the possibility of uncovering buried archaeological resources.
- Impacts to police and fire response times would be reduced, and the ratio of population to police officers and fire personnel would be improved. With the proposed project two new police personnel and two new fire personnel would be required. Because population is reduced only by 42 percent (not 50 percent) it is uncertain whether the Reduced Project would still require two new officers, or whether one would suffice.
- Demand for water would be reduced to 2.91 mgd and thus would not exceed current water allocations of 3.033 mgd.
- Reduced development would result in approximately half the demand for new school capacity.
- Air emissions would be about half of the proposed project from reductions in construction levels, new development and local traffic generation.
- Traffic noise levels would be expected to be less than with the proposed project, although traffic noise from the proposed project would not result in noticeable increases.

As documented above, the Draft EIR distinguishes between the impacts of the project and the lesser impacts of the Reduced Project Alternative. All of these impacts in the above list would, however, be reduced to less than significant with the proposed mitigation, both for the proposed project, and for the reduced project. Thus, prior to mitigation, the Reduced Project does not eliminate any significant impacts, but it does reduce the severity of impacts. Most notably, the growth inducing effects of the project would be lessened.

Environmentally Superior Alternative

The Reduced Project Alternative was not identified in the Draft EIR as the Environmentally Superior Alternative, because, although it does reduce impacts as compared to the proposed project, impacts are reduced to a greater extent by adoption of alternative components that modify the locations of development and land use designations in the Community Plan. These components avoid development in the locations that cause some of the significant unmitigated impacts of the proposed project. However, the County has determined that the Reduced Project does lessen impacts as compared to the proposed project, and so will include it in the Environmentally Superior Alternative.

The Draft EIR is revised as follows:

Page 7-57. The text starting with the second paragraph is revised to read:

Of the build alternatives, the Reduced Project alternative would not avoid significant impacts associated with the Project, but would lessen some impacts. The environmentally superior alternative would consist of the Reduced Project with appropriate mitigation measures as described for the proposed project, plus include several of the Alternative Components that have been designed to reduce impacts of the project. They include:

- AGB-A, the revised academic growth boundary that coincides with existing developed areas of the campus;
- LU-A and LUC, which change the golf course to Campus Open Space and designate undeveloped lands south of JSB as Open Space and Field Research;
- LU-E, which allows the County to identify additional lands for Special Conservation designation;
- TRAN-A, the "no net new commute trips" standard (although the County cannot <u>legally</u> require this of Stanford <u>for employee trips</u>);
- TRAN-C, which dedicates an easement for trail routes identified in the CP;
- HOUS-A, which provides a linkage between academic development and housing; and
- HOUS-J, modified to eliminate housing only on the Lower Knoll site, with housing to be relocated to Escondido Village.

Collectively, these components avoid significant impacts to open space associated with changing land use south of JSB to Academic Campus. Impacts to California tiger salamander habitat are also reduced. Housing impacts are addressed by linking academic development to housing. Transportation impacts are reduced, but not eliminated by the trip reduction (TDM) measures incorporated in component TRAN-A. <u>The Reduced Project lessens, but does not eliminate growth inducing impacts, which would still be significant.</u>

Reduced Academic Development Alternative (All Housing, Half Academic Development)

Several comments have requested analysis of an alternative under which half of the academic facilities and all of the housing would be built. The suggested alternative is within the range of alternatives studied in the Draft EIR because it essentially represents a mid point between the proposed project and the reduced project alternatives studied in the Draft EIR. The Draft EIR studies the effects of building all of the housing and all of the academic facilities, as well as half of the housing and half of the academic facilities. Under CEQA, the CEQA guidelines, and relevant case law, there is no requirement that an EIR evaluate alternatives that are additional points within the range of alternatives already evaluated in the EIR. The suggested alternative is evaluated in this response to comments because members of the public have asked for this information.

For purposes of this analysis, the same reduction in population described in Table 7-1 of the Draft EIR for the Reduced Project is assumed. Thus this alternative would include:

- 3,108 units of additional housing including up to 668 faculty and staff, 2,000 student, and 350 hospital resident and postgraduate fellow units;
- 1,017,500 additional gross square feet of academic space/facilities; and
- 1,280 new students, faculty and staff.

Table 11-2 summarizes additional population and housing units by category.

Table 11-2

Comparison of Additional Housing and Population (Estimated) Included in the Reduced Academic Development Alternative

Housing Unit Type	Number of Units (maximum proposed)	Number of Additional Individuals			
Students	2,000	397			
Hospital Residents/Postgraduates	350	339			
Faculty/Staff	668	544			

Changes in significant unavoidable adverse impacts as compared to the proposed project are discussed below.

Traffic

This Reduced Academic Development Alternative could also reduce impacts at some study area intersections (see Table 11-3). Construction traffic would be lessened. However, there would still be some significant impacts to traffic even with the Reduced Academic Development Alternative. Significant impacts at intersections would change as follows:

- Impact during the AM peak at El Camino/Ravenswood is eliminated. However, the intersection will still require mitigation during the PM peak.
- Impact during the AM peak at Junipero Serra/Campus Drive West is eliminated. However, the intersection will still require mitigation during the PM peak.
- Impact during the AM peak at Arboretum/Palm is eliminated. However, the intersection will still require mitigation during the PM peak.
- Impact during the PM peak at El Camino Real/Churchill is eliminated with the elimination of the proposed arena and theater. Without the arena and theater no mitigation would be necessary at this intersection for any of the alternatives.

All other impacts remain, and therefore, all mitigation measures would remain the same as for the proposed project, except for El Camino Real/Churchill. Mitigation at this intersection would be required for any alternative that included the arena and theater.

Open Space

Significant unavoidable open space impacts would be the same as for the proposed project and Reduced Project because they are associated with the Community Plan land use designations, not the density or intensity of development. This impact would still be significant.

Intersection Level of Service – Comparison of Year 2010 Scenarios For Reduced Academic Development Alternative

		Year 2010								
Intersection	Peak Hour	N	No Project Wit			Project v a and Tl	vithout neater	Half Academic All Housing Alternative		
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay
El Camino Real / Valparaiso	AM	D	0.879	32.1	E	1.027	42.0	Ε	0.996	41.7
	PM	F	1.091	69.3	F	1.109	77.2	F	1.104	75.2
El Camino Real / Santa Cruz	AM	C	0.815	16.3	C	0.819	16.4	C	0.814	15.6
	PM	C	0.93	22.6	С	0.952	24.1	С	0.946	22.6
El Camino Real / Ravenswood	AM	F	1.136	100	F	1.140	102.4	F	1.136	100.3
	PM	F	1.255	176	F	1.269	187.1	F	1.266	184.6
El Camino Real / Roble	AM	В	0.604	6.7	В	0.607	6.7	В	0.605	6.7
	PM	В	0.701	13.6	В	0.711	14.0	В	0.709	14.3
El Camino Real / Middle	AM	C	0.897	23.3	D	0.940	23.5	C	0.896	23.2
	PM	F	1.157	104	F	1.161	105.4	F	1.159	104.7
El Camino Real / Cambridge	AM	В	0.819	14.6	В	0.822	14.6	. C	0.819	15.5
	PM	В	0.821	13.7	В	0.824	13.8	В	0.820	13.5
El Camino Real / Sand Hill / Alma	AM	D	0.811	26.7	D	0.815	26.9	D	0.814	26.8
	PM	F	1.077	71.9	F	1.086	75.5	F	1.085	74.8
El Camino Real / Shopping Center	AM	F	N/A	54.2	F	N/A	55.3	F	N/A	54.4
	PM	F	N/A	63.4	F	N/A	66.4	F	N/A	65.3
El Camino Real / Quarry	AM	В	0.438	10.2	В	0.440	10.2	В	0.438	10.2
	PM	D	0.708	25.5	D	0.710	25.6	D	0.710	25.5
El Camino Real / Palm / University	AM	E	1.032	51.9	E	1.046	54.9	E	1.031	50.7
· · · · · · · · · · · · · · · · · · ·	PM	F	1.163	104.5	F	1.210	126.7	F	1.196	118.5
El Camino Real / PAMF Entrance	AM	A	0.441	4.5	A	0.443	4.5	A	0.443	4.5
	PM	C	0.645	15.3	C	0.648	15.3	C	0.648	15.3
El Camino Real / Embarcadero	AM	D	0.923	39.2	D	0.928	39.7	D	0.923	39.1
	PM	E	0.91	40.3	E	0.915	40.7	E	0.913	40.5
El Camino Real / Churchill Ave	AM	D	0.796	25.1	D	0.798	25.1	D	0.795	25.1
··· -	PM	D	0.985	39	D	0.989	39.7	D	0.987	39.5
El Camino Real /Serra	AM	C	0.626	15.7	C	0.635	16	C	0.630	15.8
	PM	C	0.777	18.2	C	0.788	18.6	C	0.785	18.5

Intersection Level of Service - Comparison of Year 2010 Scenarios For Reduced Academic Development Alternative

		Year 2010								
Intersection	Peak Hour	No Project			With F Aren	Project v a and Tl	vithout neater	Half Academic All Housing Alternative		
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay
El Camino Real /Stanford	AM	D	0.969	39.1	Е	0.984	41.7	E	0.980	40.9
	PM	E	1.019	41.5	E	1.048	50.1	E	1.042	48.2
El Camino Real / California	AM	С	0.699	18.0	C	0.704	18.1	C	0.699	18.1
	PM	С	0.745	16.5	С	0.764	17.0	С	0.76	16.9
El Camino Real / Page Mill	AM	F	1.072	76.3	F	1.078	78.4	F	1.074	76.9
	PM	E	0.988	48.2	E	1.002	50.9	E	0.998	50.1
University / Woodland	AM	D	0.794	28.2	D	0.798	28.3	D	0.792	28.2
	PM	D	0.649	33.3	D	0.668	33.7	D	0.664	33.6
Middlefield Road/University Ave	AM	C	0.769	20.1	C	0.781	20.7	С	0.777	20.6
	PM	E	1.027	45.9	Ε	1.068	58.2	E	1.058	55.0
Middlefield / Willow	AM	D	0.778	31.0	D	0.780	31.0	D	0.779	31.0
	PM	F	1.051	72.6	F	1.057	74.5	F	1.055	73.8
Middlefield / Embarcadero	AM	C	0.702	18.5	C	0.703	18.5	C	0.702	18.5
	PM	D	0.927	26.5	D	0.930	26.8	D	0.930	26.7
Alma Street / Churchill Avenue	AM	E	0.944	47.9	E	0.945	48.1	E	0.945	48.1
	PM	E	1.024	53.1	E	1.027	53.9	E	1.027	53.8
Junipero Serra / Page Mill	AM	F	1.094	91.1	F	1.096	92.1	F	1.095	92.1
	PM	F	1.276	190.8	F	1.306	214.3	F	1.300	209.8
Junipero Serra Blvd./Stanford Ave	AM	C	0.77	16.2	C	0.782	16.7	C	0.772	16.4
	PM	E	0.992	49.5	E	1.078	57.6	E	1.01	55.9
Junipero Serra/Campus Drive East	AM	C	0.564	16.5	C	0.573	17	C	0.565	16.8
	PM	C	0.698	23.0	C	0.718	23.8	В	0.713	14.0
Junipero Serra / Campus Drive West	AM	F	0.966	71.4	F	0.974	75.4	F	0.969	73.1
	PM	F	1.218	187.8	F	1.268	233.4	F	1.256	222.4
Junipero Serra / Alpine / Santa Cruz	AM	F	1.252	167.6	F	1.264	176.7	F	1.251	166.8
	PM	F	1.15	106.0	F	1.167	115.9	F	1.162	111.9
Sand Hill / Sand Hill Circle / I-280	AM	F	1.083	79.3	F	1.090	82.3	F	1.085	80.3
	PM	F	1.159	101.2	F	0.175	110.6	F	1.170	108.0

4

•

•

Intersection Level of Service – Comparison of Year 2010 Scenarios	
For Reduced Academic Development Alternative	

		Year 2010									
Intersection	Peak Hour	No Project			With Project without Arena and Theater			Half Academic All Housing Alternative			
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	
Sand Hill / Sharon Park	AM	В	0.858	11.1	В	0.861	11.3	В	0.857	11.1	
	PM	C	0.928	15.7	С	0.942	16.6	C	0.938	17.6	
Sand Hill / Santa Cruz	AM	F	1.066	73.3	F	1.077	76.7	F	1.068	73.9	
	PM	F	1.206	154.4	F	1.282	210.5	F	1.276	205.1	
Sand Hill / Oak	AM	F	1.356	245.2	F	1.357	245.8	F	1.356	244.7	
	PM	F	1.337	225	F	1.340	228.1	F	1.340	227.5	
Sand Hill / Oak Creek / Stockfarm	AM	C	0.821	15.3	C	0.821	15.3	C	0.820	15.2	
	PM	В	0.751	10.9	В	0.752	10.9	В	0.752	10.9	
Sand Hill / Pasteur	AM	C	0.646	16.3	C	0.647	16.4	C	0.646	16.3	
	PM	D	0.743	26.0	D	0.744	26.1	D	0.744	26.1	
Sand Hill / Arboretum	AM	E	0.941	42.8	E	0.945	43.3	E	0.941	42.7	
	PM	F	1.006	65.4	F	1.011	67.4	F	1.009	66.8	
Arboretum / Quarry	AM	C	0.67	20.1	C	0.682	20.3	C	0.675	20.2	
	PM	E	0.976	47.3	E	1.011	46.5	E	1.004	45.0	
Arborertum Road/Palm Drive	AM	E	1.026	59.2	F	1.047	65.2	F	1.035	61.6	
	PM	D	0.912	37.0	E	0.945	41.5	E	0.939	40.7	
Arboretum / Galvez	AM	В	0.741	9.7	В	0.755	10.1	В	0.747	9.9	
	PM	В	0.636	9.6	B	0.659	9.9	B	0.654	9.8	
Welch / Pasteur southbound	AM	В	0.273	7.7	В	0.278	7.7	В	0.275	7.7	
	PM	В	0.354	12.1	В	0.368	12.2	В	0.365	12.2	
Welch / Pasteur northbound	AM	В	0.218	9.8	В	0.223	9.8	B	0.220	9.8	
	PM	В	0.606	12.4	В	0.627	12.7	B	0.623	12.7	
Welch Road / Quarry Road	AM	С	0.576	17.0	C	0.587	17.3	C	0.581	17.1	
	PM	C	0.61	17.5	C	0.632	17.9	C	0.627	17.8	
Welch Road / Campus Drive West	AM	В	0.759	6.7	В	0.774	7.5	В	0.833	7.0	
	PM	F	1.52	109.6	F	2.060	242.7	F	2.046	230.0	
Pasteur / Blake/Wilbur	AM	В	1.217	5.0	В	1.243	5.6	A	1.224	4.2	
	PM	B	1.335	7.3	B	1.384	9.2	B	1.373	7.9	

Intersection Level of Service – Comparison of Year 2010 Scenarios For Reduced Academic Development Alternative

	Peak Hour	Year 2010									
Intersection		No Project			With I Aren	Project v a and T	without heater	Half Academic All Housing Alternative			
		LOS	V/C	Delay	LOS	V/C	Delay	LOS	V/C	Delay	
Santa Cruz / University	AM	В	0.723	14.8	В	0.726	14.9	В	0.776	12.4	
	PM	В	0.726	13.2	В	0.766	14.4	В	0.765	14.2	

Note: Results shown in **bold** indicate a significant impact.

Historic Resources

Impacts to historic resources would still be uncertain, and the potential for impacts could be greater than with the Reduced Project because of the higher level of housing development. This impact would still be significant.

Construction Noise

Construction noise impacts on residences adjacent to the campus are associated with the construction of new housing, so these impacts would be the same as those for the proposed project, and would still be significant.

Growth Inducing Impacts

The Reduced Academic Development Alternative would have the same economic multiplier effect as the Reduced Project, because the number of new jobs created would be the same. This impact would still be significant.

Other Impacts

The following impacts of the Reduced Academic Development Alternative are associated with the amount of housing to be constructed and would be similar to the proposed project:

- Potential scenic route impacts of building housing along JSB would be the same as for the proposed project.
- Visual impacts of housing along El Camino Real would be the same as for the proposed project.

۰.
• Demand for school capacity associated with new housing would be the same as for the proposed project.

The following impact of the Reduced Academic Development Alternative is associated with the amount of academic development and resultant populations increases, and would be similar to Reduced Project:

• The demand for housing associated with new jobs at Stanford would be the same as for the Reduced Project. As proposed in comments, this alternative would include construction of the same amount of housing as the proposed project, but with less academic development it may be more difficult for the County to require the same levels of housing. This alternative would include substantially more housing than required to meet the needs of increased population associated with academic development. Table 11-2 shows a comparison of new housing and population associated with the Reduced Academic Development Alternative. The excess housing would not be sufficient to meet existing demand for housing. There are currently 13,667 students and 5,261 faculty and staff within the general campus (not including the Medical Center or SLAC); there are 9,354 student housing units and 989 units of faculty/staff housing.

The following impacts are associated with the total amount of development and would be less than the proposed project, but greater than the Reduced Project:

- With less academic development there would be less potential for creation of impervious surface, but it is not possible to determine whether total impervious surface would be reduced by about one fourth or by much more or less. Much proposed academic development is infill, and would take place in areas that are already paved, so it is not possible to determine the extent to which impervious surface area would be changed with the Reduced Academic Development Alternative. The following impacts associated with impervious surface would be reduced to the proposed project, but to an unknown extent:
 - Runoff amounts would be intermediate between the proposed project and Reduced Project, as would the required volume of detention facilities.
 - Potential reduction in groundwater recharge would be intermediate between the proposed project and Reduced Project.
 - Potential for degradation of groundwater quality would be intermediate between the proposed project and Reduced Project.
 - Potential for surface water quality impacts would be intermediate between the proposed project and Reduced Project.
- Impacts to California tiger salamander would potentially be reduced as compared to the proposed project because a lower level of development would make avoidance of CTS habitat more feasible. However, a large amount of the development proposed in the CTS management zone is for housing, so the reduction in impacts may be small.

- The potential for disruption of nesting birds would be intermediate between the proposed project and Reduced Project.
- The potential for loss of sensitive plant communities would be intermediate between the proposed project and Reduced Project.
- The possibility of uncovering buried archaeological resources would be intermediate between the proposed project and Reduced Project.
- Impacts to police and fire response times, and the ratio of population to police officers and fire personnel would be intermediate between the proposed project and Reduced Project. Both new population and new housing serving existing students and staff would have to be served. It is thus likely that two new police personnel and two new fire personnel would still be required, similar to the proposed project. This would improve the ratio of population to service personnel.
- Demand for water would be estimated to increase to 3.11 mgd, which is less than for the proposed project, but would still exceed current water allocations of 3.033 mgd.
- Air emissions are associated with both housing and academic development and would be intermediate between the proposed project and Reduced Project.
- Traffic noise levels would be intermediate between the proposed project and Reduced Project, although traffic noise from the proposed project would not result in noticeable increases.

Conclusion

The Reduced Academic Development Alternative does not reduce environmental impacts as compared to the Reduced Project. Although additional housing affords some benefits, construction of housing also has associated impacts.

i or

MR-3 INTENSIFIED DEVELOPMENT ALTERNATIVE

Comment Summary: Several comments requested evaluation of an alternative that intensified development within the core campus and avoided development in the foothills.

Response Summary: Stanford's proposed GUP focuses development in the core campus, and the Draft EIR has evaluated alternatives that focus development even further.

The Stanford CP and GUP are not meant to define the precise locations or configurations of future individual buildings and parking to be developed on the campus. When Stanford proposes to construct new buildings or parking structures under the GUP, each proposal will be reviewed by the County for conformance with all County regulations and requirements. The Community Plan can serve to promote more intensive development by limiting the areas in which academic uses may be expanded in the future and providing incentives for more intensive academic use.

Stanford's proposal for development does generally focus development within the core campus. Much of the proposed expansion of parking and development of new academic facilities would be accomplished using the techniques suggested in comments: conversion of surface parking to parking structures, redevelopment of academic areas, and development of existing surface parking areas for academic buildings, and possibly for housing as well. Although site plans for future academic development are not available yet, Stanford intends to pursue substantial redevelopment and construction on surface parking lots to accommodate 2,035,000 gross square feet (gsf) and 3,018 housing units largely within currently developed areas (David Neuman, University Architect/Planning Office, August 31, 2000). Refer to Figure 11-1 for location of existing surface parking lots.

Stanford's current efforts already rely heavily on redevelopment and infill. A recent major academic redevelopment effort west of the Main Quad involved demolition of 134,000 gsf of older facilities, along with industrial service roads, loading docks and surface parking areas. Those were replaced with 230,000 gsf of teaching and research facilities in multi-story configurations surrounded by extensive landscaping and plazas. Thus, the floor area ratio nearly doubled with a substantial reduction in ground area coverage. This type of redevelopment is planned to continue.

Stanford also proposes to redevelop residential areas at higher densities. Examples include the proposed redevelopment of Escondido Village to construct infill development, the removal of 13 units of housing in the Searsville block to be replaced by much higher density housing, and the infill development within the existing faculty/staff residential area. Some areas, such as the existing parking lot at Quarry and Arboretum Roads, will be converted from non-residential to residential use.

In addition, the Draft EIR has evaluated alternative project components consisting of an Academic Growth Boundary (AGB) and land use designation that places tighter restrictions on development of the foothills. The Environmentally Superior Alternative includes an AGB that excludes the golf course and the majority of the Lathrop Development District from future development, and places a more restrictive land use designation (Open Space and Field Research) on the foothills, thus focusing development in the core campus, north of JSB. The County may choose to incorporate additional incentives for intensive development into the CP or GUP.

MR-4 ALTERNATIVE HOUSING SITES

Comment Summary: Several comments requested evaluation of additional sites for housing to avoid construction of housing at proposed sites such as the Golf Course and Driving Range. Recommendations included siting housing in the Arboretum, or other locations in the Central Campus.

Response Summary: Most suggested alternative housing sites have significant unavoidable environmental impacts or do not meet goals of creating faculty/staff neighborhoods. However, it would be feasible to relocate housing proposed for Golf Course Hole #1 by moving faculty/staff housing to the Driving Range and intensifying infill development in Escondido Village and in the Searsville Block as a replacement for the intended Driving Range graduate student units.

The Draft EIR evaluates the housing sites proposed by Stanford in its project application, as well as alternative housing options chosen for their potential to reduce significant environmental effects. From a planning and environmental perspective, it makes sense to construct academic facilities in the central portion of the campus, and to construct housing toward the campus edges. The resulting concentration of academic facilities reduces the need for automobile use on campus, which directly reduces vehicle emissions and also contributes to the success of transportation demand management programs by making it possible to move through the academic portion of the campus without a car. Locating housing at the campus edges also provides a transition from academic facilities to the residential neighborhoods at the campus periphery.

The Community Plan, General Use Permit, and Draft EIR anticipate that the precise location and configuration of the proposed housing units will be further defined when Stanford submits applications for approval of each individual housing project. Approval of the GUP alone does not allow Stanford to develop specific sites. Stanford must apply to the County for Architectural and Site Approval before obtaining building permits. At that time, projects would undergo additional environmental review to determine whether they will result in site specific impacts that were not evaluated in the EIR for the Community Plan and General Use Permit. Further, even though a number of potential housing sites have been identified and evaluated in the proposed Community Plan and General Use Permit, the Plan states that "Additional potential housing sites may be identified during the life of the Community Plan, both within Santa Clara County and in other jurisdictions." If such additional sites are identified and proposed, they too would be evaluated to determine whether impacts of housing construction at those sites have been studied and mitigated through this EIR.

Because the Draft EIR studies a range of project alternatives, including alternatives to the proposed housing components of the project, no additional analysis of housing alternatives is required by CEQA. The housing alternatives suggested in comments do not reduce the project's environmental effects to a degree substantially greater than the alternatives studied in the Draft EIR. Nevertheless, although not required by CEQA, the suggested alternatives are evaluated in this response to comments because members of the public and County staff have requested this information:

.

Alternative to Housing on Golf Course Hole #1

The following housing alternative would avoid construction of faculty/staff housing on Hole #1 of the Stanford Golf Course (about 11 acres of the 37.8-acre site).

- Eliminate construction of faculty/staff housing on Hole #1 and confine housing to approximately 26 acres on the northern portion of the Stable Site (Site O).
- Relocate remaining faculty/staff housing units from Site O to the17-acre Driving Range Site (Site F).
- Relocate the 350 graduate housing units proposed for Site F to the Escondido Village Infill Site (Site C). This relocation would increase the proposed 725 additional units of graduate student housing within the 116.5-acre site. With relocation of an additional 200 units from the Lower Knoll Housing site for avoidance of salamander habitat, there would be up to 1,275 total new units in Escondido Village. Some of the 350 proposed units could also be developed at the Searsville Block site (Site G) instead of Escondido Village.

This alternative would keep faculty/staff housing in a generally contiguous area, which would be consistent with Strategy #2 of the Housing Element of the Draft Community Plan: Conserve Stanford's Residential Character. Developing a contiguous area for faculty/staff housing would be in keeping with Stanford's intent to "maintain the residential program, establish neighborhoods, and maintain campus environmental character." (Strategy #2 of the Housing Element of Stanford's Proposed Draft Community Plan)

This alternative would avoid potential biological and cultural resource impacts associated with the redesign of the golf course (refer to Master Response 7 - Biological Impacts of Golf Course Redesign, and Master Response 8 - Historical Significance of Golf Course). While these impacts have been deemed not to be significant, avoidance of development on Hole #1 would eliminate the need for substantial golf course modification. In addition, the amount of development proposed would be reduced by eliminating proposed housing from the golf course on occupied CTS habitat.

Impacts of developing faculty/staff housing at the Driving Range would be essentially the same as construction of graduate housing. The only real change in impacts with this option would be associated with the intensified development of Escondido Village and the Searsville Block. Construction of up to 1,275 units of graduate student housing as infill in these areas would result in greater building heights. Buildings of more than four stories would likely be required, and would result in the need for a greater level of geotechnical investigation and structural design; however, significant geologic impacts are not expected. The potential need for taller buildings and/or structured parking associated with increased density could increase Stanford's construction costs. Taller buildings have the potential for greater aesthetic impacts than buildings with fewer stories, and this will need to be addressed in environmental review for future development. Graduate student housing could also be accommodated on other infill sites around the campus, consistent with the proposed Academic Campus Community Plan land use designation. Under the GUP, Stanford could locate student housing anywhere in the Academic Campus area. The change in location of housing sites would not alter the traffic analysis, because of the low traffic

generation rate for single graduate students. Detailed analysis of traffic impacts for specific housing projects would be necessary.

Construction of faculty/staff housing at the Searsville Block would require a change in the land use designation in the Community Plan. This area is currently designated as Academic Campus, which allows student housing, but not faculty and staff residences. The area would have to be designated as Campus Residential – Moderate Density. If Hole #1 is to be excluded from future housing the designation for this area should be changed from Campus Residential – Moderate Density to Campus Open Space (consistent with Alternative Component LU-A, which specifies that the golf course be designated as Campus Open Space). The elimination of Hole #1 as a potential area would reduce the potential for future faculty/staff housing on campus without an amendment to the General Plan.

Stanford has expressed concerns about the concepts behind replacement of graduate student housing in the Driving Range with faculty/staff housing. The University prefers to maintain a land use pattern for the campus in which faculty/staff housing is located outside the Campus Drive loop. In addition, the University contends that increased density in Escondido Village would be detrimental to the quality of the residential neighborhood (Neuman 2000).

Another site for relocation of the proposed faculty/staff housing is the Searsville Block, and graduate student units intended for Searsville could instead be developed at Escondido Village and/or the Driving Range. This approach would have the same impacts as relocation of faculty/staff housing to the Driving Range site.

Some comments have suggested the option of constructing housing in the area proposed for relocation of Hole #1. The area proposed for the new golf course hole is within the area of the Sand Hill Road development agreement, which limits the use of this area to recreation and academic fields until 2020. Under that agreement as it now stands, it is not possible to develop housing in this area within the term of the GUP. However, Stanford is expecting to reach a tentative agreement with the City of Palo Alto to modify the development agreement to allow housing on a 13-acre portion of this area. If and when the development agreement is modified, the potential use of this area for housing could be considered.

The United States Fish and Wildlife Service has suggested that the Driving Range be eliminated as a housing site and fully restored as habitat for the CTS. Because the Driving Range is larger than the Hole #1 site, this alternative does create additional habitat restoration opportunities. In addition, if housing is proposed and approved for the site currently under the Sand Hill Road development agreement, faculty/staff housing could be relocated to that site and the Driving Range could be restored.

Avoiding the construction of housing at Hole #1 is thus feasible, but not without some constraints. Construction of housing at the Hole #1 was not identified as having any significant and unavoidable impacts, but if the golf course is left as is there would be no loss of oak trees, requiring replacement oaks. Other impacts of redesign of the golf course would be expected to be minor. Intensified development at Escondido Village or other sites has associated impacts, but these are differences in degree of impact; no new impacts are expected to result. Loss of a

٠

housing site could reduce the total potential for housing on campus, unless constraints on development in the area of Sand Hill are removed in the future. Because Stanford is opposed to construction of faculty/staff housing in the Driving Range area, the loss of the housing site at Hole #1 may simply result in construction of less faculty staff/housing (i.e Stanford may opt to construction the lowest number of faculty staff housing units described in the GUP, rather than the higher end of the potential range of units) unless the County adopts requirements regarding housing development.

Arboretum

Page 7-58 of the Draft EIR provides information about why housing at the Arboretum was rejected as an alternative. In reference to the potential use of the Arboretum and the Oval for housing, the Draft EIR states that "Loss of these sites to housing would reduce open space and could result in significant visual impacts and impacts to historical resources." The Arboretum is a major open space on the campus. Leland Stanford's original plan for the Arboretum was to contain specimens of every type of tree that could be grown in Palo Alto (The Campus Guide -Stanford University, by Richard Joncas, David J. Neuman and Paul V. Turner, Princeton Architectural Press 1999). The original plantings included a number of exotic specimens with eucalyptus planted as "nurse trees" to shelter delicate plants until they could become established. This plan was neglected, after Leland Stanford's death, and the eucalyptus eventually overwhelmed the more delicate exotics. More recently, the Arboretum has been replanted with California species such as oak and buckeye as eucalyptus trees have died back. Although it has not fulfilled its original intent as a true arboretum with a wide variety of tree and plant specimens, the Arboretum does fulfill an important function as open space and visual buffer between the busy commercial area along El Camino Real and the central campus. As such it was an important part of Frederick Law Olmstead's original plan for the campus. The entry through the Arboretum serves to define Stanford as "a place apart" where on entering the campus the Arboretum provides a passage from the everyday world to the University, a place of retreat for scholars. Olmstead also used concepts of juxtaposition, contrasting the informal area of the Arboretum with the more formal Palm Drive (Stanford University Landscape Design Guidelines).

As pointed out on page 4.2-3 of the Draft EIR, the Arboretum also serves as an important detention area for storm water runoff from the central campus. As a result, portions of the Arboretum are classified as seasonal wetlands, whose loss would be a significant impact. The Arboretum also includes a number of historic features, including the Mausoleum.

Construction of housing in the Arboretum would thus have significant and unavoidable impacts on campus open space and potential impacts to historic resources, biological resources and hydrology. Visual impacts of development at this site on El Camino Real would also be potentially significant, although Mitigation Measure OS-4, Protect Visual Quality Along El Camino Real, would reduce this impact to less than significant. Construction of housing would result in loss of the modified oak woodland habitat that is present on the site. Loss of trees would be mitigated by Mitigation Measure BIO-7, Planting of Replacement Trees.

Parking Lots

Some comments have suggested construction of housing in existing surface parking lots, with lost parking to be replaced by the construction of parking structures. Stanford has already included construction of parking structures in its plan for adding parking to the campus. Figure 11-1 shows Stanford's proposed parking plan, which includes five parking structures with a total of about 5,000 parking spaces many of which are replacement spaces for those spaces lost to building construction. It is possible that other parking structures could also be constructed within the parameters of the Community Plan and General Use Permit. Stanford has indicated that some of its proposed new housing would be built over surface parking areas. Although relocation of additional student housing to these sites might be feasible, it is not in keeping with Stanford's development goals for faculty and staff neighborhoods.

Area Surrounding the Carnegie Institution, Cordura Hall and Ventura Hall

This area has been proposed as a potential housing site. According to Stanford all of the current facilities mentioned are fully utilized; Cordura Hall and Ventura Hall are historic structures (listed on Stanford's Historic Values Index); and the Carnegie Institution has a long-term ground lease for its academically related activities, which include adjacent biological field research. This limits the feasibility of using this site during the term of the proposed GUP, although it does present possibilities for future redevelopment.

Environmental Safety Facility

It has been suggested that this facility be relocated, and the existing facility demolished to provide a site for housing. Given the level of controversy associated with the original siting of this facility, and the potential constraints to locating a new environmental safety facility, this alternative is not deemed to be feasible. Relocating the facility off-site would also necessitate transporting hazardous material to the facility over public streets, which is not currently necessary. This would likely affect the permitting and operations of the ESF, which are necessary for both research labs and the hospitals. ŝ



MR-5 PROJECT CONFORMITY WITH PALO ALTO URBAN SERVICE AREA BOUNDARY

Comment Summary: Several comments expressed concern that the project was not in compliance with the Palo Alto Urban Service Area Boundary and requested evaluation of an alternative Academic Growth Boundary consistent with the Urban Service Area Boundary.

Response Summary: Stanford is exempt from policies regarding Palo Alto's Urban Service Boundary.

Due to the unique nature of Stanford, the rules, regulations and policy agreements relating to urban service areas are applied differently for Stanford than for other areas of the County. Because of Stanford's multi-jurisdictional setting and the need to consider issues concerning annexation as they specifically apply to Stanford, the County of Santa Clara, City of Palo Alto, and Stanford University are parties to an agreement entitled the 1985 Land Use Policy Agreement. This agreement sets forth the policies regarding land use, annexation, planning, and development of Stanford lands in Santa Clara County, and defines what uses may remain in the unincorporated County, and what uses must be annexed to the City of Palo Alto. Both Palo Alto and Stanford have agreed that Stanford does not need to seek annexation to Palo Alto for parcels designated for academic use. Housing for students, faculty and staff is considered an academic use. Housing not reserved for these groups is a non-academic use that is required to be annexed.

In light of the multi-jurisdictional agreements, unincorporated Stanford lands are exempted by the County of Santa Clara and the Land Use Policy Agreement from the following two major General Plan strategies generally applicable to urban unincorporated areas:

- Stanford is not subject to the requirement that unincorporated lands within city urban services areas should be annexed to the cities in whose urban services areas they are located.
- Land uses for unincorporated lands at Stanford within city urban service areas are not required to conform to the general plan of the city in whose urban service area they are located (i.e., the City of Palo Alto).

The needs and issues that are commonly addressed through the mechanisms of annexation, sphere of influence, and urban service area, primarily the provision of urban services such as utilities, police, and fire protection, are instead addressed at Stanford through the Land Use Policy Agreement. The County follows city general plans within Urban Services Areas so that development is consistent with the city regulations when annexation occurs. Because academic uses at Stanford are not intended for future annexation, they are not required to conform to the requirements of the City of Palo Alto. Dispensation from the Palo Alto Comprehensive Plan through the Land Use Policy Agreement also applies to the Palo Alto Urban Service Area. By agreement of all parties, it is the County General Plan that defines the extent of growth at Stanford.

An Urban Service Area boundary normally delineates areas within a city or that a city intends to annex and provide with services within five years. The City of Palo Alto has also defined its Urban Service Area boundary as its urban growth boundary for the time frame of the City's Comprehensive Plan. At Stanford, the Palo Alto Urban Service Area boundary correlates to the division between the County's existing Campus and Academic Reserve and Open Space land use designations. The Campus designation indicates those areas that the County had previously defined for development in intensive academic use.

Because Stanford provides its own urban services under the 1985 Land Use Policy Agreement, the City of Palo Alto Urban Service Area boundary does not indicate the location in which the City intends to provide urban services. The City, the County and Stanford initially entered into an agreement that Stanford lands in the Palo Alto Urban Service Area would not be annexed to the City at the time that the County initiated the general policy that lands within urban service areas should be annexed. Because Stanford is responsible for its own urban services, a more accurate representation of the Palo Alto Urban Service Area would include no Stanford lands in unincorporated Santa Clara County.

The location of the Palo Alto Urban Service Area boundary at Stanford, therefore, is based upon County policies rather than the intentions of the City to annex or provide urban services to this area.

In their response to the Notice of Preparation for the Draft EIR, the City of Palo Alto did request consideration of alternatives in the Draft EIR. The two alternatives that were requested included a "reduced-scale alternative". This alternative was included in the Draft EIR, and is titled the "Reduced Project". The City also requested that the EIR examine "a project alternative that focuses all proposed development on the northeast side of Junipero Serra Boulevard". This alternative was also included, and is titled "Alternative Academic Growth Boundary AGB-B". This AGB follows Junipero Serra Boulevard (JSB), restricting development to the northeast side Although the City did not request an evaluation of an alternative that restricted of JSB. development outside of its Urban Service Area, the EIR does evaluate an AGB alternative that is fairly close to the Urban Service Area boundary. Alternative AGB-A parallels the boundary of existing academic development, and excludes the golf course both north and south of JSB. This alternative AGB differs from the Palo Alto Urban Service Area boundary in that it includes existing academic development south of JSB (including the Center for Advanced Study in the Behavioral Sciences and Bureau of Economic Research). Portions of the proposed Stable Site housing on Hole #1 of the Golf Course and housing areas along El Camino Real are also outside the Urban Service Area, but within all of the alternative AGBs. Figure 11-2 shows all four boundary lines: Stanford's proposed AGB, the two alternative AGB's analyzed in the Draft EIR, and Palo Alto's Urban Service Area boundary.

An alternative AGB conforming to the Urban Service Area Boundary would result in the following changes

- Further development south of JSB would not be allowed.
- Housing on Hole #1 of the golf course and along El Camino Real would be lost or would have to be relocated (See Master Response 4).

Because AGB-A allows further development only in the small area south of JSB that already contains academic facilities, the intensification of use in this area would not substantially change the character of the area. The area available for additional development is small, and only a limited number of facilities could be developed. The Carnegie project is already proposed for this area, and development, if permitted, would be limited by the currently accessible lands.



Stanford University CP/GUP Project EIR Palo Alto Urban Services Area Boundary PARSONS HARLAND BARTHOLOMEW & ASSOCIATES, INC. Figure 11-2

MR-6 RECREATIONAL AND OPEN SPACE IMPACTS OF GOLF COURSE REDESIGN

Comment Summary: A number of comments expressed the opinion that relocation of Hole #1 of the Stanford Golf Course would damage the recreational and open space value of the course. Concern was also expressed about the potential reconfiguration or relocation of Holes #2 through #7.

Response Summary: Stanford has proposed a redesign of the golf course that will maintain an appropriate flow of play and will preserve the recreational and open space value of the course. The open space value of golf courses is limited.

As shown in Figure 7-3 of the Draft EIR lands located north of the existing golf course would be used to provide a replacement for golf course land lost if residential development were to occur on Hole #1. Because Hole #1 starts near the clubhouse, the configuration and order of the first seven holes of the golf course must be modified to maintain the current flow of play. Although the specific aspects of the project would be considered at the time of an application from Stanford, Stanford has proposed one approach for reconfiguration of these holes. The new Hole #1 would be in the location of existing Hole #6, as shown in Figures 11-3 and 11-4. Because Stanford would maintain a complete 18-hole golf course following reconfiguration, there would be no reduction in the recreational or open space value of the course. The golf course would still be a par 70 championship course with extensive oak woodlands, use of the creek as a golf course feature, and an option to use an expert tee for Hole #1 that would include hitting the first shot across JSB.

The Draft EIR also includes an alternative component that would locate additional housing on Holes #2 through #7 in the event that environmental constraints eliminate other proposed housing sites. This alternative component would require relocation of all seven holes to a site in the foothills south of the existing golf course (see Figure 7-3 of the Draft EIR). This alternative is not a part of the GUP as proposed by Stanford. It was evaluated as an alternative to reduce the impact of other housing sites within the central campus area where concerns had been raised. The analysis in the EIR determined that this alternative (termed HOUS-B) was not environmentally superior, based in part on the loss of habitat and open space in the foothills that would result from relocating the golf course. Relocation of golf course Holes #2 through #7 is not proposed by Stanford and is not recommended by the Draft EIR.

Although it does provide a greenbelt at the edge of the campus, the open space value of the Stanford Golf Course is limited because it does not achieve many of the purposes of open space preservation in Santa Clara County. County policies recognize the fact that unlike open space in its natural state, golf courses have substantial impacts on the natural environment. Although natural vegetation, including oak trees, remain on the golf course, the original natural habitat has been much altered by the construction of the course and the management practices necessary to keep its greens and fairways manicured. Golf courses use chemicals, which prevent them from affording the water quality protection that is one of the purposes of open space. They also have a high demand for water. These environmental concerns regarding golf courses are recognized in

County policies specific to golf courses (Policies R-PR 14, R-PR 15, R-PR (i) 8). While golf courses can provide open space value and prevent further development of land in golf course use, the Community Plan provides other opportunities and mechanisms for more effective protection of natural areas.





MR-7 BIOLOGICAL RESOURCE IMPACTS OF GOLF COURSE REDESIGN

Comment Summary: A number of comments asserted that the Stanford Golf Course was important, even critical, wildlife habitat; emphasizing the importance of the oak forests, roughs, ditches, riparian areas, and the San Francisquito Creek corridor to special-status species of wildlife and plants, especially California tiger salamander (CTS) and California red-legged frog (CRLF).

Response Summary: Review of the potential golf course modifications, coupled with a field investigation of the habitat impacts that would occur as a result of these modifications, do not indicate a significant impact to sensitive biological resources.

While golf course roughs, scattered oaks and hedgerows, and ditches constitute wildlife habitat, such areas are not critical in the regional sense. This is especially true when compared with much larger land parcels of open space in the foothills, and on contiguous lands governed by the Peninsula Open Space Trust, State of California, and counties of San Mateo, Santa Clara, and Santa Cruz.

Results of The Center for Conservation Biology's monitoring studies of CTS on the golf course and in ditches feeding Lake Lagunita from the golf course do not support the contention that ditches on the course are major migration pathways for CTS. Annual monitoring of these sites west of Campus Drive West during the rainy season has revealed almost no findings of CTS in recent seasons. The golf course itself is not estivation habitat for CTS due to golf course maintenance activities and the majority of the course is not in the CTS management Zone.

San Francisquito Creek is undisputedly important habitat for fish and wildlife and the riparian corridor is an important link between the foothills and San Francisco Bay. There are currently three locations on the creek where golf carts can cross: cart bridges between the second green and third tee (2-3), between the third green and fourth tee (3-4) and between the fourth tee and green (4th). There is also a low-water channel crossing between the fourth tee and green. As part of Stanford's proposed golf course redesign of Holes 3, 4, and 5 (which involve play and movement across San Francisquito Creek), two bridges (2-3 and 3-4) would be retrofitted (with no instream structures). The fourth hole crossing would be eliminated, resulting in the removal of two instream barriers to fish migration: a culverted concrete apron golf cart crossing and a concrete spillway. Removal of this existing creek crossing and the roadway leading to and from the crossing, would be accompanied by restorative plantings of native riparian trees, shrubs, and herbs in a site now devoid of vegetation with the exception of roadside weeds and invasive, exotic species. Adequately protective setbacks of golf course fairways and holes from the riparian edge have not yet been determined but will be negotiated with the County and CDFG prior to construction. The net impact should be beneficial to riparian features so as to result in no significant adverse impact on riparian habitat. Specific impacts of any modification of the golf course would be identified through the site-specific evaluation of the proposal.

Valley, coast and blue oaks occur in the golf course and on hills and swales of the surrounding area. Some of these trees are very old, large trees. However, many are not associated with oak woodlands, which are characterized by a diverse, multi-layered vegetative structure, but rather are remnants of oak woodland, consisting of a single tree or small group of trees with an annual grassland understory. The Draft EIR classifies these areas as annual grassland-oak woodland. A total of 16 oak trees, none of which are associated with a multi-storied oak woodland community, would be removed and replaced by mitigation plantings at ratios of 3:1 (see below).

Each of the Draft EIR Evaluation Criteria for Biological Resources is discussed below in terms of possible impacts of golf course redesign. Stanford's plans as proposed for redesign of the golf course will not result in any new significant impacts that were not disclosed in the Draft EIR, nor will redesign of the golf course substantially increase the severity of any of the impacts disclosed in the Draft EIR.

BIO-1. Will the Project cause a loss of individuals or occupied habitat of endangered, threatened, or rare wildlife or plant species?

The fairways, greens, and other landscaped areas associated with the golf course do not provide habitat for endangered, threatened, or rare species.

Sixteen oaks would be removed as part of the golf course redesign. However, there are no endangered, threatened, or rare wildlife species associated with these oak-dominated habitats, including CTS. Monitoring of CTS in the golf course, along roughs, on tees and greens, and in ditches west of Campus Drive West, reveals almost no CTS (personal communication, Alan Launer, Stanford Center for Conservation Biology, August 25, 2000).

A number of CNPS List 1B species are documented in the Draft EIR as having potential habitat in the GUP EIR project area. Of these species, only Fragrant fritillary (*Fritillaria liliacea*) is associated with annual grassland-oak woodland habitats. This species is most often associated with serpentine soils, which are not found at the golf course. Given the absence of annual grasslands on serpentine substrates on the golf course, it is not likely that fragrant fritillary occurs in the project area. However, Stanford's project description for the realignment includes techniques equivalent to mitigation measures BIO-1 (f) through BIO-1(k) – Rare, Threatened, and Endangered Plant Protection Program. Therefore, the realignment would not cause significant impacts to sensitive plant species.

Steelhead salmonids are known from San Francisquito Creek in the reaches that pass through the golf course. Although the creek has year-round flow, migration takes place in the winter and breeding and egg-laying occurs in the upper portions of the watershed, away from the golf course and campus. California red-legged frog has not been documented from these reaches of the creek; however, the creek is potentially suitable habitat for this species. As part of the golf course redesign of Holes 3, 4, and 5 (which involve play and movement across San Francisquito Creek), two bridges (between Holes 2-3 and 3-4) would be retrofitted (with no instream structures). In addition, the crossing between the fourth tee and green would be eliminated, resulting in the removal of two instream barriers to fish migration: a culverted concrete apron golf cart crossing and a concrete spillway. Retrofitting of the first two bridges would not require work within the

stream; however, Stanford's project description for the redesign includes use of water quality BMPs to ensure that construction activities do not result in runoff of soils or pollutants into the creek. Removal of the creek crossing between the fourth hole tee and green would require minimal work within the stream. To avoid potential impacts to these steelhead and California red-legged frog, Stanford has stated in its project description for golf course redesign that retrofitting and removal of creek crossings will take place during the dry season, and water quality BMP's will be implemented and followed (refer to letter dated September 27, 2000 - Appendix G Letter 129). Thus, as described in the Draft EIR, impacts to both species will be avoided through a combination of spatial buffers, timing of construction and BMPs. There are no new impacts that were not discussed in the Draft EIR. Removal of the existing fish barriers will actually result in a beneficial impact to steelhead.

The Draft EIR is revised as follows:

Page 4.8-27. The discussion of impacts to steelhead and California red-legged frog is revised:

No Impact; Steelhead and California Red-legged frog

The proposed Community Plan and General Use Permit application do not propose any new development or other activities within or adjacent to any of the creeks in the project area. <u>However</u>, if housing is proposed on Hole #1, the first seven holes of the golf course would be realigned. As currently proposed, two existing golf cart bridges crossing San Francisquito Creek would be retrofitted and one crossing would be removed. Retrofitting and removal of creek crossings would be done during the dry season to avoid impacts to migrating steelhead or California redlegged frogs that may occur in the creek. Removal of barriers to steelhead migration would be beneficial. Stanford has indicated that the following measures will be included as part of their project description for redesign of the golf course.

- <u>Stanford will obtain a 1600 series Streambed Alteration Agreement from the</u> <u>California Department of Fish and Game prior to the retrofitting of bridges or</u> <u>removal of instream structures.</u>
- <u>Water quality BMPs will be implemented to avoid runoff of sediments or</u> pollutants during retrofitting of the two golf cart bridges.
- Instream structures will be removed during the dry season only, so as not to disturb salmonid migration or red-legged frog breeding during the rainy season.
- <u>Cranes will be used to remove the instream concrete and steel, rather than</u> excavators, in order to minimize disturbance to the streambed. Blasting of underwater concrete should be avoided.

The project would result in the construction of new impervious surfaces, which would increase surface runoff from the project area. In addition, project construction activities and runoff from new developed areas have the potential to result in a degradation of surface water quality. However, the hydrology

mitigation measures included in Section 4.5, Hydrology and Water Quality, would apply to these activities and would require surface water detention basins, water quality BMPs, and other drainage facilities stormwater management measures that would be designed to maintain surface runoff at existing levels and protect water quality. No impacts to steelhead or California red-legged frog would therefore occur.

BIO-2. Will the Project cause a net loss of individuals of CNPS List 3 or 4 plant species?

No known populations of rare plants occur on the golf course, but undiscovered occurrences may exist. As explained in the Draft EIR pre-construction special status plant species surveys will be conducted, and, if populations are found, mitigation proposed in the Draft EIR will be implemented. Potential impacts of golf course redesign were thus fully addressed in the Draft EIR. Stanford's project description for the realignment also includes the use of these measures.

BIO-3. Will the Project cause a net loss of active raptor nests, migratory bird nests, or native wildlife nursery sites?

Pre-construction surveys of the golf course areas slated for reconstruction will be conducted to minimize impacts to nesting raptors and other native wildlife nursery sites. Measures contained in the Draft EIR thus fully address potential impacts of golf course redesign. Stanford's project description for the realignment also includes the use of these measures.

BIO-4. Will the Project cause a permanent net loss of habitat for sensitive wildlife species?

Less than Significant

Re-design of the golf course will not result in a change of impacts from what is disclosed in the Draft EIR.

BIO-5. Will the Project cause a permanent loss of sensitive native plant communities?

Re-design of the golf course will remove 16 oak trees, but none of these is part of oak woodland habitat. All are isolated trees surrounded by annual grassland, and immediately adjacent to or surrounded by golf fairways. In addition, given the mitigation required in the Draft EIR for oak tree replacement (3 trees planted for every one removed), the loss of oak trees would not be permanent. Measures contained in the Draft EIR thus fully address potential impacts of golf course redesign. Stanford's project description for the realignment also includes the use of these measures.

BIO-6. Will the Project substantially block or disrupt wildlife migration or travel corridors?

Construction of Campus Drive West in the 1980s significantly disrupted CTS migration through the golf course, as evidenced from the road kills observed since the roadway was built. Monitoring of the golf course in recent years reveals very few sightings of CTS on the fairways, in the roughs, tees, greens, and in the ditches of the course (personal communication, Alan Launer, Stanford Center for Conservation Biology, August 25, 2000). The golf course redesign would not substantially block or disrupt CTS movements through this area.

BIO-7. Will the project conflict with the County's tree preservation ordinance?

Redesign of the golf course would remove up to 16 trees. Mitigation already included in the Draft EIR would be adequate to reduce this impact to less than significant by replacing any trees lost at an appropriate ratio. Stanford's project description for the realignment also includes the use of these measures.

BIO-8. Will the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The golf course is not within the CTS Management Zone, and redesign of the golf course is not prohibited under the CTS Management Agreement.

BIO-9. Will the project result in a net loss of wetlands or other waters of the U.S.?

There are no known wetlands in the areas to be slated for golf course redesign. San Francisquito Creek is considered a water of the U.S., but removal of in-stream structures is not an adverse impact. The Draft EIR contains measures for avoidance and replacement of wetlands that would fully address any potential impacts to wetlands and waters of the U.S. Stanford's project description for the realignment also includes the use of these measures.

MR-8 HISTORICAL SIGNIFICANCE OF GOLF COURSE

Comment Summary: A number of comments expressed the concern that the Stanford Golf Course is a historical resource and that the relocation of Hole #1 and construction of housing units in its place would destroy the historical integrity of the course.

Response Summary: The Stanford Golf Course does not meet the criteria for inclusion on the National Register of Historic Places or the California Register of Historical Resources, nor does it qualify as a historical resource pursuant to CEQA definitions. Therefore, relocation of Hole #1 will have no effect on an historic resource.

The criteria and definitions used to determine a resource's historical significance are stated in the Draft EIR, page 4.9-7, and briefly outlined below:

CEQA

CEQA Guidelines Section 15064.5 define a significant historical resource as one that meets the criteria of the California Register of Historical Resources (itemized below), is included in a local register of historic resources, or is determined by the lead agency to be historically significant.

California Register of Historical Resources

Eligibility to the California Register is determined by a resource's historical significance at the local, state, or national level under one or more of the following four criteria:

- 1. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of the history and cultural heritage of California and the United States;
- 2. It is associated with the lives of persons important to the nation or to California's past;
- 3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- 4. It has yielded, or may be likely to yield, information important to the prehistory or history of the state and the nation.

Additionally, a property must exhibit a measure of integrity, judged in relation to location, design, setting, materials, workmanship, feeling, and association.

National Register of Historic Places

Eligibility to the National Register is based on the criteria defined in 36 CFR 60.4:

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, association, and

- a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b) that are associated with the lives of persons significant in our past; or
- c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d) that have yielded, or may be likely to yield, information important to prehistory or history.

Research into the history of the Stanford Golf Course and its significance to the golfing community has revealed the following facts:

- The Stanford Golf Course was designed by renowned golf architect, George C. Thomas collaborating with William "Billy" Bell, in 1929 as his (Thomas') last work.
- Together Thomas and Bell designed no less than 8 courses in California.
- Thomas was known as a naturalist designer, largely incorporating environmental elements into the design of his courses.
- Many nationally and internationally well-known golfers have played on Stanford's course including Mickey Wright (1935-), considered by many to be the greatest woman golfer in history.

These facts would indicate that any historic significance of the golf course would be associated with National Register under criteria b and c, and to the California Register under criteria 2 and 3. However, there are several additional facts that would be considered by SHPO and the National Park Service (keeper of the National Register listings) to cause the golf course to be ineligible for listing in either/both registers.

- Stanford Golf Course has undergone several periods of redesign over the course of its lifetime. The green complex of Hole #4 and the tee box of Hole #5 were relocated in 1971 to accommodate the original expansion of Sand Hill Rd. Robert Trent Jones designed modifications to the course in which bunkers were added to the 11th fairway and the 16th green in 1984. In 1987 an irrigation system was added to the course. All of the greens (18) and sand traps (53) were rebuilt in place in 1994. Therefore, the data indicate that Stanford Golf Course no longer retains integrity of the original design for which its association with golf architects Thomas and Bell is based, which would make it ineligible under criterions 3 and C of the California and National Registers respectively.
- 2. Famous golfers who have been noted as being Stanford alumni include Mickey Wright, Tom Watson, and Tiger Woods. While these individuals are national and international championship golfers, it cannot be demonstrated that they are individuals important to the nation or to California's past in accordance with the required criteria (criterion 2 and B of the California and National Registers respectively). National Register Bulletin 15 *How to Apply the National Register of Criteria for Evaluation* states "Persons 'significant in our past' refers to individuals whose activities are demonstrably important within a local, State, or national historic context" (1995:14). Bulletin 15 further states that "Properties

associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contribution to that field" (1995:16). All of the golfers noted above are still living.

- 3. Currently, within Santa Clara County, there are 7 working golf courses that pre-date Stanford and 1 additional course (post-dating Stanford) designed by William "Billy" Bell (Northern California Golf Association webpage August 2000 www.ncga.org/southbay.html). The Burlingame Country Club, an 18-hole course in Hillsborough, was built in 1893 and the San Jose Country Club, also an 18-hole course, was built in 1899. Both clubs became members of the Northern California Golf Association in 1906. The Stanford Golf Course cannot be identified as the oldest or last remaining example of its kind.
- 4. The Certified Stanford Sand Hill Road Corridor Projects EIR (EIP 1998), prepared for the widening of Sand Hill Road, which will impact portions of the Stanford Golf Course, does not identify the golf course as a historic resource. Widening of the roadway will result in the relocation of Holes #3 and #4, and will affect Hole #2 as well.

As an additional note, although the Stanford Golf Course is well known by many golfers and landscape architects, the national golfing community does not consider it to be Thomas' best work. Golf Magazine (August 1998:80) ranks Riviera Country Club in Pacific Palisades, California, #24 in their Top 100 U.S. Rankings and Los Angeles Country Club, North, as #37. Thomas designed the Riviera in 1927 and the Los Angeles Country Club in 1928. Both clubs pre-date Stanford, which is classified as a "Lesser Known Gem" in the same article. The Stanford Golf Course is not rated in the Top 100 in the article.

MR-9 ADDITIONAL OPEN SPACE PROTECTION

Comment Summary: A number of comments requested that additional open space protection be afforded to the foothills, and opposed any development of the foothills area.

Response Summary: The Draft EIR has evaluated a range of methods for open space protection, and has identified several of these options as being part of the Environmentally Superior Alternative.

The Draft EIR evaluates the open space impacts of the CP/GUP as proposed by Stanford, and provides alternatives that would provide greater protection to more open space than proposed in the CP/GUP. The Lathrop area is the only location south of JSB that Stanford has proposed to develop. Regarding speculative future development, it is beyond the scope of this EIR to evaluate the impacts of development proposals or requests for General Plan amendments that are not envisioned in the current CP/GUP timeframe. Such proposals would be needed to initiate development in the foohills.

The CP/GUP Draft EIR also analyzes the long-term implications of the proposed change in land use designation to Academic Campus in the Lathrop District. It also identifies project alternatives that would avoid this change and the resulting open space impacts.

There are a wide variety of mechanisms available to the County to provide long-term protection of open space in the foothills area of Stanford, and the Draft EIR has evaluated a number of them. Methods for open space protection that are evaluated in the Draft EIR include the establishment of an Academic Growth Boundary, and alternative land use designations for foothill lands. Other methods for open space protection, such as easements, have been suggested. The mechanism selected to achieve the environmental benefits of open space protection is a policy decision, not an environmental consideration that is within the scope of the Draft EIR. The open space protection options evaluated in the Draft EIR are discussed below.

These options in the Draft EIR would protect open space during the life of the CP/GUP. Since the CP/GUP is the project subject to CEQA review, consideration of protection mechanisms beyond the CP/GUP timeframe is not relevant to this analysis.

Academic Growth Boundary

One of the primary methods for preserving open space lands is through the creation of an Academic Growth Boundary (AGB), whose purpose is to define lands that are to be retained as open areas as separate from those areas that should be targeted for future development. Outside the AGB, land is to remain undeveloped except for utilities, agricultural uses or academic uses associated with research activities that require a remote or foothill setting for their functioning. Recreational use of the areas outside the AGB is promoted through dedication of trails consistent with the Countywide Trails Master Plan.

Stanford proposed an AGB that encompassed all of the existing golf course lands and a 154-acre proposed Lathrop Development District. The Draft EIR evaluated two alternatives to this AGB,

both of which afford protection to additional open space lands (refer to Figure 7-1, which shows AGB Alternatives). One option (AGB-A) coincides with existing developed areas of the campus and excludes the majority of the existing golf course from development. The second alternative (AGB-B) follows Junipero Serra Boulevard (JSB) and excludes all lands south of JSB from development. The Draft EIR identifies AGB-A as being environmentally superior to Stanford's proposed AGB, and includes it as a component of the Environmentally Superior Alternative. Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Land Use Designations

Golf Course Area

Stanford's proposed CP included a change in the land use designation of the golf course from Open Space and Academic Reserve to Academic Campus. This would remove the existing restrictions placed by the County on development of the golf course. Although the open space values of the golf course are limited due to its developed nature and the limits on its use by the general public, the change in designation would allow future development of the golf course for more intensive academic and housing uses. Alternative LU-A proposes changing the entire golf course from a designation of Academic Campus to Campus Open Space, thus affording open space protection to the golf course. The Draft EIR identified this land use designation as environmentally superior to Stanford's proposal, and included component LU-A in the Environmentally Superior Alternative.

Foothills

Stanford has proposed two land use designations for lands outside of the AGB. Areas with environmental constraints such as riparian corridors and special status species habitat are proposed as Special Conservation. These lands include areas along creeks and a portion of the upland habitat of the California tiger salamander. The remainder of foothill lands outside of the AGB are proposed as Open Space and Academic Reserve. The latter designation was described as "lands outside the core campus which are undeveloped, and are reserved for future academic use". Allowable uses were proposed to include "low-intensity academic and conservation uses that are in keeping with the open space character and are dependent upon unique open space resources, or that by their programmatic nature require a remote or natural setting."

The Draft EIR evaluated an alternative land use designation for the remaining undeveloped portions of the foothills. Instead of designating these lands as Open Space and Academic Reserve, Alternative LU-C would designate them as Open Space and Field Research. This designation would not allow the "low-intensity" development included in Open Space and Academic Reserve designation proposed by Stanford. Allowable uses under the Open Space and Field Research designation would include:

- field study activities;
- utility infrastructure in keeping with the predominantly natural appearance of the foothill setting;

- grazing and other agricultural uses;
- recreational activities which are consistent with protection of environmental resources and with appropriate policies regarding foothill access;
- specialized facilities and installations that by their nature require a remote or natural setting, such as astronomical or other antennae installations or structures accessory to field study activities; and
- environmental restoration.

Other uses would not be permitted without a General Plan Amendment, which would also require amendment of the AGB. The Draft EIR identified this land use designation as environmentally superior to Stanford's proposal, and included component LU-C in the Environmentally Superior Alternative.

MR-10 COMMUNITY PLAN DESCRIPTION OF DENSITY AND INTENSITY OF DEVELOPMENT

Comment Summary: A number of comments requested that the Community Plan identify proposed limits on density and intensity of development for each proposed land use.

Response Summary: Density and intensity are appropriately defined either in the Community Plan or in the General Use Permit.

The Draft EIR analyzed a density and intensity of development specified in the proposed Community Plan and General Use Permit Application. For the purpose of CEQA review, the County believes that this level of specificity is adequate because the maximum square footage of academic development, maximum number of housing units, and population increase were identified in the Draft EIR.

From the perspective of a planning approach, the County has further defined density and development intensity as part of the Preliminary Staff Recommendation for the Stanford University Community Plan (August 2000).

As many comments note, Stanford's proposed Community Plan includes density standards for residential development. The Campus Residential-Low Density designation allows up to 8 units per acre, while the Campus Residential-Medium Density allows between 8 and 15 units per acre. Of the remaining land use designations, only two, Academic Campus and Public School, are designed to allow continued development of land. The others (Open Space and Academic Reserve, Special Conservation, Campus Open Space) are all designed to preserve open space. The Academic Growth Boundary is also designed to focus development in the central campus area.

The mechanism for controlling the intensity of development in the area designated as Academic Campus is the issuance of the General Use Permit, which governs the intensity of development. With a current building area of 12,300,000 square feet, the current proposed GUP development would allow an additional 3,485,000 square feet of development in the Academic Campus area, including 2,035,000 additional square feet of academic and support space, 2,000 housing units for students and 350 units for postdoctoral fellows (assuming 550 square feet per student unit and 1,000 square feet per unit for postdoctoral fellows). Faculty staff housing would occur in areas designated as residential and is excluded from this total. Compliance of the CP with state standards is not an environmental issue and will be addressed during the CP adoption process.

24

MR-11 BIOLOGICAL RESOURCE IMPACTS TO CALIFORNIA TIGER SALAMANDER

Comment Summary: A number of comments raised the issue of impacts to California tiger salamander (CTS), a California Department of Fish and Game (CDFG) species of special concern, and a U.S. Fish and Wildlife Service (USFWS) candidate for listing under the federal Endangered Species Act.

Federal and State wildlife biologists regard the proposed CTS mitigation by Stanford University (i.e. the CTS Management Agreement) as unproven, with its success problematic. One letter asserts that CTS mitigation success for the Lathrop Development District is unproven; mitigation ponds have failed to produce salamanders in both of the past two years; reliance on current mitigation and salvage of CTS does not reduce impacts to a less-than-significant level. Comments assert that several years of monitoring are necessary to prove or disprove CTS mitigation success and reduction of environmental impact.

Federal and State wildlife biologists request that upland CTS habitat, including lands surrounding Lake Lagunita, the driving range for the golf course, the Lower Knoll and vicinity, Gerona Triangle, the Lathrop District, and all open space between these locations and Lake Lagunita, be preserved in perpetuity by conservation easement or comparable mechanism.

Some of the comments state that the CP/GUP Draft EIR is not consistent with the existing CTS Management Agreement. In addition, many comments view the Draft EIR analysis of impacts to CTS as inadequate, and request further delineation of locations and abundance of CTS on the Stanford campus.

Response Summary: The Stanford CP/GUP Draft EIR is a program-level CEQA document that reviews the impacts to CTS at a commensurate level of detail. The Draft EIR concludes that the CP/GUP may adversely affect CTS. Two mitigation options have been proposed to reduce impacts to the species. Stanford is currently operating consistent with an interagency CTS Management Agreement. Finally, this Master Response offers a third mitigation option, written to allow a mechanism for the suggestions of federal, State, and local officials to be considered wholly, or in part, by the County.

The Draft EIR discloses the impacts to CTS in considerable detail, beyond what is normally required for a program-level EIR. Stanford University biologists have been studying CTS since 1941. Since 1991, Stanford University biologists from the Center for Conservation Biology have intensively studied CTS in order to provide information necessary for conservation planning. In some cases, results of these studies have been published in scientific journals, and are available to the public in regional biology libraries (such as the University of California and Stanford) and some city libraries. During the preparation of the Draft EIR this data was reviewed and determined to be acceptable for use in the analysis of impacts to CTS at Stanford. Information about CTS at Stanford is presented on pages 4.8-11 through 4.8-19 of the Draft EIR.

Stanford University entered into an agreement with Santa Clara County, the California Department of Fish and Game (CDFG), and the U.S. Fish and Wildlife Service (USFWS) in 1998:

the CTS Management Agreement. The University has taken several steps to manage CTS in the spirit of this broad agreement, which was intended to address specific construction projects that Stanford developed under the 1989 GUP. The Management Agreement specifically states that "This agreement is not intended to preclude future activities within the CTS Management Zone that are beyond the scope of this Agreement; however, for activities beyond the scope of this Agreement, additional mitigation measures may be required as appropriate in the approval process to mitigate the impacts of such activities."

Stanford has agreed that additional CTS mitigation is required for development now proposed under the CP/GUP. However, the Draft EIR has identified that mitigation proposed by Stanford (CTS Option 1, described on pages 4.8-28 through 4.8-32 of the Draft EIR) would not fully mitigate impacts to CTS. Therefore Option 2, which requires more stringent measures protecting CTS is also included in the Draft EIR (pages 4.8-32 through 4.8-33). Option 2 was deemed to reduce CTS impacts to less than significant levels.

Although Option 2 was evaluated and determined to be capable of reducing impacts to less than significant, additional constraints could be placed on development to avoid construction within the CTS Management Zone as suggested by CDFG and USFWS. This approach would avoid loss of existing CTS habitat and potential habitat, rather than replacing it by developing new areas as CTS habitat. The existing habitat areas north of JSB are problematic in terms of their habitat value for CTS, because they are surrounded by intensive academic development, but they are closer to the salamander's current breeding area in Lake Lagunita. CTS habitat issues and other planning considerations for the County, such as interest in compact development and housing, will need to be balanced in these locations.

In view of the wide range of disagreement regarding CTS at Stanford as disclosed by public and agency comments on the subject, a third mitigation Option (Option No. 3) is included for consideration. This will allow decisionmakers several options in determining the best approach for mitigating impacts to CTS. Decisionmakers will have to consider the practicality of this mitigation, because it may be difficult to obtain.

The Draft EIR is revised as follows:

Page 4.8-34, the following mitigation option is inserted after the first paragraph:

- Mitigation:
 BIO-1 (a) through (e) Option 3: Federal and State Alternative CTS

 Mitigation Program (proposed by the United States Fish & Wildlife Service and California Department of Fish and Game)
 - (a) In order to ensure that there is no net loss of CTS habitat and to provide for the long-term protection and management of CTS habitat at Stanford:
 - (1) Lake Lagunita shall be preserved as a salamander breeding location, and the Lagunita "campus open space" shall be protected in perpetuity by a conservation easement or similar enforceable restriction.

; -

- (2) The existing driving range shall be restored to grassland and oak savanna, which shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
- (3) Existing open space areas (upland summer refuge areas) at the Lower Knoll, Gerona Triangle, Lathrop District and existing open areas that connect these districts to the Lake Lagunita salamander breeding location shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
- (4) Several large, recessed channels covered by open grates at road level, with barriers to guide salamanders in and to keep them off Junipero Serra Boulevard, shall be constructed to allow for CTS migration and habitat areas south of JSB.
- (b) Same as described for Option 1.
- (c) Same as described for Option 1.
- (d) Same as described for Option 1.
- (e) Same as described for Option 1.

After

Mitigation: Less than Significant

BIO-1(a) through (e) - Option 3 would mitigate for potential impacts to California tiger salamander by permanently preserving existing habitat for CTS, restoring additional lands for habitat, and constructing facilities to reduce road kills. Option 3 provides for the long-term protection of CTS habitat by requiring dedication of conservation easements or other comparable land use controls over the habitat. Very little occupied CTS habitat would be developed and habitat would be created and/or preserved. These measures would protect upland habitat in close proximity to viable breeding habitat in perpetuity. The impact after mitigation is therefore considered less than significant

•

12 RESPONSES TO COMMENTS RECEIVED ON THE DRAFT EIR

12.1 INTRODUCTION

The regulations for implementing CEQA direct the lead agency to respond to substantive public comments on the Draft EIR (Guidelines 15204(a)). Nevertheless, all comments received during the comment period for the Draft EIR are responded to in this Chapter. The range of possible responses includes requiring specific mitigation measures, modifying alternatives, supplementing analyses, making factual corrections, and explaining why comments do not warrant further agency response. In cases where public response has been especially voluminous, the agency may summarize or consolidate similar comments, as long as all substantive issues are represented.

This chapter includes responses to each individual written and oral comment on the Draft EIR. Written comments are included in Section 12.3 and oral comments follow in Section 12.4. Editorial revisions to the Draft EIR made by the County in response to comments are shown in both the Responses to Comments (Section 12.3) and in Chapter 13, Changes to the Draft EIR. Text revisions are formatted in revision fashion: strikeouts indicate removed text and <u>underlines</u> indicate new text.

12.2 USE OF COMMENT SUMMARIES

The full text of all written comments is included in Volume IV. Each comment is identified by a comment number in the margin; responses use the same corresponding number system. In addition, to facilitate reading the response to comments, a summary of each comment is inserted in *italics* just prior to each response. This summary does not substitute for the actual comment; the reader is urged to read the full original text of all comments. The responses are prepared in answer to the full text of the original comment, and not to the abbreviated summary.

12.3 LIST OF COMMENT LETTERS

The comment letters have been numbered based upon date of receipt. One hundred and twenty nine (129) comment letters were received on the Draft EIR. Each comment letter is identified below by comment number, comment author and date.

Letter Number	Comment Author	Comment Date
1	Christy Holloway and Mary Davey	6/30/00
2	CA Regional Water Quality Control Board, SF Bay Region	7/10/00
3	Karen White	7/18/00
4	Richard Stultz	7/18/00
5	Scott McNealy	7/18/00
Letter Number	Comment Author	Comment Date
---------------	--	--------------
6	Allan Abbott	7/19/00
7	John R. Barksdale	7/19/00
8	Robert J. Polito	7/19/00
9	Michael Mcteigue	7/19/00
10	John and Sue Brock-Utne	7/19/00
11	Nonnette Hanko	7/19/00
12	County of Santa Clara Environmental Resources Agency, Julie Taylor, Integrated Waste Management Program	7/19/00
13	Richard H. Harris, Jr.	7/19/00
14	College Terrace Residents' Association	7/24/00
15	Jeb Eddy	7/24/00
16	Barbara Pickering	7/24/00
17	David E. Wilkins	7/25/00
18	Jean C.R. Finney, California Department of Transportation	7/26/00
19	Jon Corelis	7/27/00
20	Mark Sabin, Georgie Gleim and Charlotte Cagan, Palo Alto Chamber of Commerce	7/28/00
21	Robert Augsburger	7/28/00
22	Christy Telch	7/29/00
23	Eric Fertig	7/30/00
24	Yoriko Kishimoto	7/30/00
25	Deanna Mann	7/31/00
26	Mark Lerner	7/31/00
27	Kent Kaiser	7/31/00
28	Sally Barlow-Perez	7/31/00
29	Allan Abbott	7/31/00
30	Allen Cypher	7/31/00
31	Nils Davis	7/31/00
32	Herb Borock	7/31/00
33	Jack Tohaner	7/31/00
34	Ashok Vyas, County of Santa Clara Roads & Airports Department	8/1/00
35	Susan M. Ivey and Ted C. Herman	8/1/00
36	Don Hielson	8/1/00
37	Dan Wagner	8/1/00
38	Gary Shade	8/1/00
39	Charles N. Taubman	8/1/00
40	David E. Wilkins	8/1/00
41	Steven Aronson	8/1/00
42	Tom Keelin	8/2/00

.

Letter Number	Comment Author	Comment Date
43	Paul Hartke	8/2/00
44	Kenneth C. Nitz, Midpeninsula Regional Open Space District	8/2/00
45	Kevin Schofield	8/2/00
46	John Baca	8/2/00
47	Bill and Lorna Ward	8/2/00
48	Cheryle Gail	8/2/00
49	Michael Mcteigue	8/2/00
50	Barbara Dawson	8/2/00
51	Dr. and Mrs. George Gioumousis	8/3/00
52	Peninsula Conservation Center Foundation	8/3/00
53	David B. Montgomery and Toby F. Montgomery	8/3/00
54	Jeannie Siegman	8/3/00
55	Thomas S. Jordan, Jr.	8/3/00
56	Rex S. Jackson, Shirley Merill, David Obershaw, and Lynn and Olivier Pieron	8/3/00
57	Gerry Plunkett	8/3/00
58	Herb Borock	8/3/00
59	J. Paul Lomio	8/3/00
60	Mary C. Davey	8/3/00
61	Lyman P. Van Slyke	8/3/00
62	Sally-Ann Rudd, Downtown North Neighborhood Association	8/3/00
63	Henry Lawrence	8/3/00
64	John R. Barkdsale	8/3/00
65	Jeannie Siegman	8/3/00
66	Rachel B Hooper and Laurel L. Impett, Committee for Green Foothills	8/4/00
67	Barbara J. Cooke, P.E., Chief, Northern California Coastal Cleanup Operations Branch, California EPA, Department of Toxic Substances Control	8/4/00
68	Karen J. Miller, Chief, Endangered Species Division, U.S. Fish and Wildlife Services	8/4/00
69	Charles Taubman	8/4/00
70	Christen Carlson Osborne and Janet Rutherford	8/4/00
71	T.J. Connelly	8/4/00
72	Janet Rutherford	8/4/00
73	Denis R. Coleman	8/4/00
74	Kathy Durham	8/5/00
75	Linda Cohen	8/5/00
76	Don Knott	8/5/00
77	Penny Katz	8/5/00

Letter Number	Comment Author	Comment Date
78	Sandy Forrest	8/5/00
79	Eric Fertig	8/6/00
80	Howard Franklin	8/6/00
81	Walter Sedriks	8/6/00
82	Paul Gardner	8/6/00
83	Joanne Marent	8/6/00
84	Richard Harris, Esq., Committee to Save Stanford Golf Course	8/7/00
85	Craig Breon, Town of Portola Valley	8/7/00
86	Derek A. Kantar, Santa Clara Valley Transportation Authority	8/7/00
87	William C. Springer, P.E., Associate Civil Engineer, Community Projects Review Unit, Santa Clara Valley Water District	8/7/00
88	Pria Graves	8/7/00
89	Dan Kalb, Director, Sierra Club, Loma Prieta Chapter	8/7/00
90	R. Dennis Reinhardt	8/7/00
91	Donald A. Phillips, Ed.D., Superintendant of Schools, Palo Alto Unified School District	8/7/00
92	James Sweeney, President, Stanford Campus Residential Leaseholder, Inc.	8/7/00
93	The Robert N. Bush Family	8/7/00
94	Liz Kniss, Mayor, City of Palo Alto	8/7/00
95	Jane Mark, Park Planner, Planning and Development, County of Santa Clara Environmental Resources Agency	8/7/00
96	Arlinda Heineck, Chief Planner, City of Menlo Park	8/7/00
97	Betty Koski	8/7/00
98	Katie Shoven	8/7/00
99	Gail Sredanovic	8/7/00
100	Jeffrey Segall	8/7/00
101	Robert W. Floerke, Regional Manager, Central Coast Region, California Department of Fish and Game	8/7/00
102	Barbara J. Schussman, Mccutchen, Doyle, Brown & Enerson, LLP for Stanford University	8/7/00
103	Peter Drekmeier, Executive Director, Stanford Open Space Alliance	8/7/00
104	Dianne Dryer	8/7/00
105	Tina Minell	8/7/00
106	Harold Boyd	8/7/00
107	Herb Borock	8/7/00
108	Herb Borock	8/7/00
109	Susan Cole	8/7/00
110	Eric Fertig	8/7/00
111	John Baca	8/7/00

· • •

.

Letter Number	Comment Author	Comment Date
112	Ann Norton Porter and Richard P Porter	8/7/00
113	Winthrop S. Reis	8/7/00
114	Bill Krepick	8/7/00
115	Kenneth R. Stalder, Ph.D.	8/7/00
116	Kirsten Flynn	8/7/00
117	John (Last name not provided)	8/7/00
118	Amy Larson	8/7/00
119	Richard Stultz	8/7/00
120	Kay Cornelius Jeanquartier	8/7/00
121	Deborah Clark	8/7/00
122	Katherine Abu-Romia	8/7/00
123	Chris Stromberg	8/7/00
124	Jason Marshall, Assistant Director, Department of Conservation, Office of Governmental and Environmental Relations, Division of Mines and Geology	8/7/00
125	David T. Smernoff, Ph.D., Project Director, Arastradero Preserve Stewardship Project	8/5/00
126	Mary Davey	8/6/00
127	Terry Burnes, Planning Administrator, County of San Mateo Planning and Building Division	8/9/00
128	Donald A. Phillips, Ed.D., Superintendant of Schools, Palo Alto Unified School District	9/15/00
129	David J. Neuman, University Architect and Associate Vice Provost for Planning, Stanford University	9/27/00

The following pages include responses to each individual written comment received on the Draft EIR

COMMENT LETTER 1, CHRISTY HOLLOWAY AND MARY DAVEY, 6/30/00

Response to Comment 1-1

Comment Summary: The comment requests information on the advantages of building all new housing on undeveloped land and of redevelopment of land where there is already moderate density with higher density housing.

Whether a specific project to develop higher density housing on an existing housing site will have fewer environmental impacts than development of housing on undeveloped land depends upon a variety of factors. In this case, two of the proposed housing sites involve increased density of existing housing areas. Several other proposed housing sites are small undeveloped infill sites in existing residential areas. The Draft EIR shows that the significant environmental effects of constructing housing at both of these types of housing sites are relatively few. Two of the 15 housing sites proposed by Stanford contain sensitive habitat that would be lost by construction of housing. Development of these sites would result in relatively more impacts than the proposed redevelopment of existing housing sites and construction of smaller-scale infill housing development in existing residential areas. Refer to Master Response 4, Alternative Housing Sites for additional discussion of redevelopment of developed areas of the campus.

Response to Comment 1-2

Comment Summary: The comment states that all housing sites included in the GUP are on undeveloped land (except site G) and suggests that the Draft EIR is inconsistent in its analysis of housing impacts by not requiring increased housing density in areas of existing lower or moderate density housing.

Stanford's proposed housing sites are largely located on undeveloped land, with two sites involving redevelopment at existing housing sites. Housing at Site G, the Searsville Block would be developed by removing 13 units and replacing them with 250 new units. Housing at Site C, Escondido Village infill would consist of construction of 725 new units in this existing housing area, resulting in much higher density housing. The EIR considers a net loss of housing to be an adverse impact, so removal of housing would be considered an adverse impact if the housing were not replaced by at least an equal number of units. Replacement at a higher density would be considered a beneficial impact. Existing faculty/staff homes are owned by individual residents with long-term leases of the land from Stanford. Large scale removal of this type of housing for replacement at a higher density would likely not be feasible.

Response to Comment 1-3

Comment Summary: The comment states that the proposed development of the Mayfield Playfield would not be mitigated by measures included in the Draft EIR to require the improvement of open space areas included in the Stanford Community Plan.

It is true that the Mayfield Playfield provides a recreational resource (grass field) that can be used for field games. However, the Draft EIR includes Mitigation Measure OS-3 (page 4.2-22)

1

that will require Stanford to improve areas proposed for Campus Open Space within the faculty/staff subdivision. The exact improvements to be constructed will be defined by the County during project specific review. At a minimum, the improvements should include the recreational facilities that will be lost from proposed housing development.

To clarify the language of Mitigation Measure OS-3, the Draft EIR shall be revised as follows:

Mitigation: OS-3: Improvement of Parks and Dedication of Trails

In addition to dedicating designating lands for use as parks, Stanford shall improve parks in the faculty area in such a way as to provide suitable recreational opportunities for the campus population and shall continue to provide neighborhood recreation opportunities in new residential areas. At a minimum, the park improvement shall provide facilities equal or greater to those lost from development of proposed GUP housing sites. To replace and expand recreational opportunities in the foothills, Stanford shall also dedicate the trail easements shown on the County Trails Master Plan. Stanford will work with the County Parks Department to clarify the process for developing the easement agreement, to identify the general location and type of uses that will be permitted for the trails being dedicated, and to discuss future construction and management considerations. The proposed location of the trail corridors will need to address conflicts with existing agricultural leases and sensitive riparian habitats along the adjacent creeks. Dedication of the trail corridors does not include a requirement for Stanford to make any improvements to the trail corridors at this time, but such improvement may be agreed to by Stanford and the County Parks Department. Dedication could shall be phased as academic and residential development under the GUP proceeds.

Response to Comment 1-4

Comment Summary: The comment requests closer study of impacts to California tiger salamander at Lake Lagunita from proposed graduate student housing.

The habitat value of the Driving Range has been evaluated by biologists at Parsons and Thomas Reid Associates. Both have concluded that the Driving Range is not suitable CTS habitat due to the activities associated with the Driving Range, the presence of manicured turf, and the absence of squirrel holes. The land immediately adjacent to Lake Lagunita is proposed to be designated Campus Open Space. See Figure 4.2-5 in the Draft EIR. The Campus Open Space designation will benefit the CTS by protecting the land that provides suitable CTS habitat and travel corridors. Site specific studies would be conducted at the time that a specific housing proposal is brought forward for the site. Please refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 1-5

Comment Summary: The comment asks whether the County could give Stanford credit against their housing needs for the use of the off campus Mayfield School site.

Whether or not Stanford gets "credit" for housing on a specific site is not an environmental issue per se, so long as the overall balance of housing in relation to jobs and the impact of the housing imbalance on low-income households, in particular, are addressed as specified in the Draft EIR. As noted on page 7-59 of the Draft EIR, "The Mayfield School site is not included in the GUP because it is not in Santa Clara County; (but it) may be considered for future housing".

Response to Comment 1-6

Comment Summary: The comment requests further study of the Reduced Project Alternative.

Refer to Master Response 2, Reduced Project Alternative.

Response to Comment 1-7

Comment Summary: The comment states that the population analysis appears to omit "Daytime Population", which has been part of past studies. This omission changes the "on campus density" significantly which is relevant to traffic analysis and other infrastructure impacts.

The traffic analysis included campus residents, student population, and campus jobs (both faculty and staff). Refer to the discussion of existing and future trip generation on pages 4.4-54 and 4.4-55 of the Draft EIR and in Response to Comment 94-42. Analysis of water and wastewater demand was also based on both campus residents and academic and academic support uses. Thus both analyses reflect the daytime population, even though the population analysis is based on actual resident population. As monitored in the 1989 GUP, "Daytime Population" included several population categories for lands outside the GUP project area. Because it was not possible to verify the accuracy of these population categories, this counting method will not be used by the County in the future.

Response to Comment 1-8

Comment Summary: The comment states that the Carnegie permit should not be processed until after the CP is finished.

The Carnegie Foundation project is not included in the analysis prepared for the Stanford CP/GUP, because the project is being processed as a separate action. The Carnegie Foundation project and alternatives have been evaluated in the Carnegie Foundation Research/Office Facility Draft and Final EIR. The project is however, considered in the cumulative analysis for the CP/GUP EIR.

Response to Comment 1-9

Comment Summary: The comment asks whether the County could prepare a computer model, photo montage, or a three dimensional model of the proposed development on campus.

The preparation of a computer model or three dimensional photo simulation is not practical for a programmatic planning document such as the Community Plan/General Use Permit. The location and size of individual buildings is unknown at this time.

COMMENT LETTER 2, CA REGIONAL WATER QUALITY CONTROL BOARD, SF BAY REGION, 7/10/00

Response to Comment 2-1

Comment Summary: The comment states that based on the project description, the proposed development would disturb more than five acres and must be covered under the State General Permit for Discharges of Storm Water Associated with Construction Activity (General Permit). Stanford must propose and implement pollution control measures that are consistent with the General Permit.

The actions that Stanford will take to prevent storm water pollution due to construction activities are noted on pages 4.5-20 and 21 in the Draft EIR. Responses to this and several other comments regarding stormwater quality impacts have been addressed through revision of Mitigation Measure HWQ-3: Protect Water Quality and revision of Mitigation Measure HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution in the Final EIR.

Mitigation Measure HWQ-3 Protect Water Quality, which starts on page 4.5-19, is revised to read:

Mitigation: HWQ-3: Protect Water Quality

(a) Stanford shall submit a Notice of Intent (NOI) to the State Water Resources Control Board for the construction activities allowed by the GUP to be covered under NPDES General Permit CAS000002. <u>As an alternative, Stanford may also</u> <u>submit additional NOIs for specific major projects.</u> Stanford <u>shall will</u> be required to comply with the terms of the NPDES permit for each construction site at all construction sites (even sites where less than 5 acres are disturbed). that includes more than 5 acres. This includes preparation of Storm Water Pollution Prevention Plans (SWPPP) <u>covering all projects involving land disturbance that</u> will be constructed pursuant to the General Use Permit for the construction site. The SWPPPs shall identify effective Best Management Practices (BMPs) for preventing groundwater pollution caused by any construction activities. <u>The</u> <u>SWPPPs It</u> shall also identify BMPs that have been demonstrated to be effective in preventing storm water pollution caused by runoff occurring during construction.

(b) Prior to any new construction, Stanford shall perform a survey where development is proposed to occur to determine the location of wells that have not been properly abandoned within the proposed site. If any such wells are located on the site proposed for development, Stanford shall perform an investigation to verify that the well was properly abandoned. If Stanford cannot confirm that the well was properly abandoned, Stanford shall take steps to locate and abandon the well in accordance with State and local standards. <u>Stanford shall request assistance and information from the Santa Clara Valley Water District to locate existing inactive wells on sites to be developed and to confirm procedures for properly destroying inactive wells.</u>

(c) Prior to any construction, demolition, grading, or landscaping within 50 feet from the top of a bank of a Santa Clara Valley Water District watercourse, Stanford shall obtain a permit from the District.

(d) During construction, Stanford shall monitor the effectiveness of storm water pollution prevention best management practices at all construction sites during and after storm events.

(e) As a General Use Permit condition, Santa Clara County shall require that, W-within the boundaries of the unconfined zone, Stanford shall not engage in new land uses or practices (e.g. storage of chemicals in single wall tanks, application of pesticides that could be transported down to the groundwater supply) that could pose a threat to the groundwater supply. If <u>Stanford leases portions of its</u> property in the unconfined zone is leased and maintained by others, <u>Stanford shall notify</u> and require that the leaseholders comply with the restriction education regarding land use practices that could threaten the groundwater supply pesticide use shall be provided to leaseholders. <u>Santa Clara County will enforce Stanford's</u> compliance with this restriction.

Page 4.5-21, Mitigation Measure HWQ-4 Best Management Practices for Preventing Post-Construction Urban Runoff Pollution is revised to read as follows:

Mitigation: HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution

(a) Stanford shall implement site improvements for new buildings and parking lots shall that include BMPs that are effective for preventing post-construction storm water and groundwater pollution caused by urban runoff, including grassy swales and vegetated filter strips. Parking lot runoff BMPs considered shall include grassy swales or vegetated filter strips.

(b) Prior to construction, Santa Clara County Land Development Engineering shall review and approve the proposed post-construction BMPs to assure conformance with the Santa Clara County Urban Runoff Management Plan (URMP).

Measures to protect riparian habitat are discussed in Section 4.8 of the Draft EIR, Biological Resources. As noted on page 4.8-30, "Pursuant to Santa Clara County General Plan policy, all USGS blue line streams in the project area which are predominantly in their natural state will be required to have a 150-foot setback from the top of stream bank...".

COMMENT LETTER 3, KAREN WHITE, 7/18/00

Response to Comment 3-1

Comment Summary: The comment states that the Draft EIR does not address the cumulative impacts of Stanford's plan on neighboring communities.

The Draft EIR includes analysis of cumulative impacts in each impact section of Chapter 4. Cumulative impact analysis for public services and utilities is provided on page 4.10-19. The

Draft EIR concludes that significant cumulative impacts would be mitigated with the implementation of mitigation measures identified for the CP/GUP.

Response to Comment 3-2

Comment Summary: The comment states that Stanford should provide land and money for Palo Alto schools, school administration use, and community services to offset the impact of proposed CP/GUP development.

Refer to Response to Comment 91-6.

The Draft EIR includes analysis of the CP/GUP impact on public services and utilities and population and housing. Increased population on the Stanford campus that is attributable to the CP/GUP will be primarily accommodated with services and utilities provided by Stanford. However, potential impacts to services provided by Palo Alto have been addressed in the Draft EIR, including potential impacts to fire department and wastewater services. Generally, impacts to other Palo Alto services that may be used by Stanford residents are not quantified. Stanford provides park and library facilities to its residents, but that does not guarantee that Stanford residents will not use Palo Alto facilities because of their availability. Stanford residents have the same access to Palo Alto facilities as residents of other communities outside of Palo Alto. However, based upon the provision of these facilities at Stanford, it is not possible to determine the level, if any of the impact to Palo Alto facilities based upon Stanford's population growth. Finally, residents that occupy new housing proposed in the CP/GUP will not be Palo Alto citizens. Therefore, these residents will not have priority access to many of the other services that are provided by the City.

COMMENT LETTER 4, RICHARD STULTZ, 7/18/00

Response to Comment 4-1

Comment Summary: The comment opposes housing on the golf course.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; Master Response 4, Alternative Housing Sites; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; and Master Response 8, Historical Significance of Golf Course.

COMMENT LETTER 5, SCOTT MCNEALY, 7/18/00

Response to Comment 5-1

Comment Summary: The comment states that the Stanford Golf Course is an area-wide recreational resource in an area with two few golf courses and that it has open space and environmental protection values.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign; and Master Response 8, Historical Significance of Golf Course.

Response to Comment 5-2

Comment Summary: The comment states that removal of Hole #1 of the golf course would cripple the golf course.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

Response to Comment 5-3

Comment Summary: The comment states that the City should encourage Stanford to increase the density of its housing to accommodate more people on less land.

Refer to Master Response 1, Statement for or Against the Project or Project Components; and Master Response 3, Intensified Development Alternative.

COMMENT LETTER 6, ALLAN ABBOTT, 7/19/00

Response to Comment 6-1

Comment Summary: The comment requests an alternate location for housing that would avoid the Stanford Golf Course

Refer to Master Response 4, Alternative Housing Sites and Master Response 8, Historical Significance of Golf Course.

Response to Comment 6-2

Comment Summary: The comment states that the golf course is economically self-sufficient and provides revenue to support other athletics.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign. The effect of the proposed project on the Stanford Athletic Department budget is outside the scope of the EIR analysis.

COMMENT LETTER 7, JOHN R. BARKSDALE, 7/19/00

Response to Comment 7-1

Comment Summary: The comment states that a wide range of open space uses are needed for the community and that Stanford's proposals for golf course development will result in impacts to both golf course open space and foothills open space (if the golf course is relocated).

Refer to Master Response 4, Alternative Housing Sites; and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 8, ROBERT J. POLITO, 7/19/00

Response to Comment 8-1

Comment Summary: The comment is opposed to any development plans that Stanford University has that threaten the Stanford golf course and the surrounding open space. The comment also states that further high density development near Sand Hill Road would be disastrous and would create havoc on the already overcrowded streets in the area.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

The Draft EIR included the Sand Hill Road development as part of the cumulative project list. As such, the development levels included in the Sand Hill Road project were analyzed along with proposed development in the CP/GUP to determine if any cumulative traffic impacts would result. Significant and unavoidable intersection impacts were identified in the Draft EIR traffic section for three intersections along Sand Hill Road.

Response to Comment 8-2

Comment Summary: The comment indicates that the Stanford Golf Course is a historic golf course and among the best in the world.

Please refer to Master Response 8, Historical Significance of the Golf Course.

Response to Comment 8-3

Comment Summary: The comment states that the barren open space west of Foothill but nearer Page Mill would be a more suitable place for development than areas on the west side of campus because it would spread traffic congestion over a larger area and there is plenty of room for the necessary improvements.

Moving the proposed development to a location closer to Page Mill might in fact tend to concentrate more traffic on Page Mill Road by decreasing the attractiveness of Alpine Road and Sand Hill Road as routes to I-280. Additionally, as housing is located farther from academic and support activities on the campus, the proportion of residents that will walk or use bicycles to reach campus may decrease, resulting in more automobile trips within the immediate area. Finally, spreading out the proposed GUP development would also result in greater impacts to open space and visual resources.

COMMENT LETTER 9, MICHAEL MCTEIGUE, 7/19/00

Response to Comment 9-1

Comment Summary: The comment indicates that the Stanford Golf Course is a historic championship golf course.

Please refer to Master Response 8, Historical Significance of the Golf Course.

COMMENT LETTER 10, JOHN AND SUE BROCK-UTNE, 7/19/00

Response to Comment 10-1

Comment Summary: The comment states that the golf course is a sanctuary for wildlife and suggests that there must be other land on campus for housing.

Please refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign.

Response to Comment 10-2

Comment Summary: The comment indicates that the Stanford Golf Course is a historic golf course.

Please refer to Master Response 8, Historical Significance of the Golf Course.

COMMENT LETTER 11, NONNETTE HANKO, 7/19/00

Response to Comment 11-1

Comment Summary: The comment states that Figure 4.1-2 and pages 4.1-5 and 6 of the Draft EIR are not accurate or complete concerning the Coyote Hill area and its relationship to the City of Palo Alto's Urban Growth Boundary. The comment also states that Palo Alto's Agricultural Conservation Zone District (A-C) would be a good starting point for discussions with the County on proposed zoning for all Stanford lands in Palo Alto's sphere of influence.

Figure 4.1-2 of the Draft EIR is intended to provide a general location of Stanford land use areas and the adjacent land uses of neighboring jurisdictions. Lands located within the Palo Alto city limits are outside of the CP/GUP planning boundary and are not proposed for any land use changes. Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary for a discussion of how Stanford's lands relate to Palo Alto's Urban Service Area boundary and sphere of influence.

Response to Comment 11-2

Comment Summary: The comment states that Stanford should not be exempt from acquiring use permits for projects of 5,000 gsf or less, as even small projects located close together could destroy the beauty of the area.

The land use designation (Open Space and Academic Reserve) proposed for a majority of the Stanford foothills would require a use permit for any academic use, including projects under 5,000 gsf. The use would also have to be consistent with the allowable uses described on page 2-8 of the Draft EIR. The remaining land use designation (Special Conservation) proposed in the Stanford foothills would not allow any new academic development. Allowable uses in this designation are limited to conservation activities, field environmental studies, preexisting academic activities, and agriculture.

Response to Comment 11-3

Comment Summary: The comment states that the Stanford Community Plan should be considered as a cluster development project; with the Core Campus considered as the permitted development, and the Stanford foothills as the mitigation required for the Core development.

Refer to Master Response 1, Statements for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; and Master Response 9, Additional Open Space Protection.

COMMENT LETTER 12, COUNTY OF SANTA CLARA ENVIRONMENTAL RESOURCES AGENCY, JULIE TAYLOR, INTEGRATED WASTE MANAGEMENT PROGRAM, 7/19/00

Response to Comment 12-1

Comment Summary: Provision must be made for collection of recyclables and garbage on a regular basis, including areas for collection of recyclables.

Section 4.10.A.4 of the Draft EIR describes solid waste and recycling at Stanford. As noted in the Draft EIR, page 4.10-4, Stanford contracts with Peninsula Sanitary Services, Inc. for collection of waste. The Draft EIR also describes Stanford's recycling program, which would be continued with the new GUP. As noted there, the program already includes recycling of concrete, wood and electronic materials. The Community Plan did not include a specific section on Solid Waste Management and Energy Resources, but referenced those sections of the County's General Plan as appropriate to guide Stanford land use. It is therefore Stanford's intent to comply with County General Plan policies, including policies on source reduction and recycling, including use of recycled materials where feasible. Stanford would also be subject to County policies regarding energy efficiency and conservation.

Response to Comment 12-2

Comment Summary: The comment states that one option for reducing the negative effects on air quality would be the use of low or zero emission vehicles where possible for site services, such as garbage and recycled material collection vehicles.

This is a good suggestion, and one that Peninsula Sanitary Services, Inc. may consider when the time comes to replace existing equipment. Several agencies and jurisdictions are moving toward vehicle fleets that operate on alternative fuels.

Response to Comment 12-3

Comment Summary: The comment requests that staff, contractors, and subcontractors be aware that recycling containers should be situated in a manner to discourage entry and entrapment of animals.

The practices regarding disposal and recycling containers are outside the scope of analysis conducted in this EIR. This issue is covered through University policy written by the Director of Housing and Director of the Stanford Physical Plant/Corporation Yard.

COMMENT LETTER 13, RICHARD H. HARRIS, JR., 7/19/00

Response to Comment 13-1

Comment Summary: The comment states that there are better locations for housing than the golf course and indicates that the Stanford Golf Course is the work of a historically significant landscape architect and should be protected.

Refer to Master Response 4, Alternative Housing Sites; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign; and Master Response 8, Historical Significance of the Golf Course.

Response to Comment 13-2

Comment Summary: The comment states that the Stanford Golf Course provides recreation and competition to 70,000 or more of Stanford's students, faculty, staff, alumni, friends and the public each year.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

Response to Comment 13-3

Comment Summary: The comment asserts that more than half of the golf course acreage is a transitional ecosystem, habitat for endangered plants and wildlife, and a haven for wildlife; environmental impacts of building replacement holes would be substantial; and alternatives should be considered for the housing proposed for Hole #1.

Refer to Master Response 4, Alternative Housing Sites; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; and Master Response 7, Biological Resource Impacts of Golf Course Redesign.

Response to Comment 13-4

Comment Summary: The comment states that the crowding and accompanying traffic problems at the already overburdened Alpine Road/Junipero Serra Boulevard/Sand Hill Road intersections will alarm large numbers of the University community and its alumni, friends, and neighbors. As noted in the comment, there have been concerns voiced by others about the traffic congestion at the Junipero Serra/Alpine/Santa Cruz intersection. However, the proposed mitigation of adding a right turn lane from Alpine Road to Junipero Serra Boulevard would improve operations at this intersection to better than conditions without the project. The City of Menlo Park controls this intersection and they would need to approve any geometric changes to mitigate traffic impacts.

COMMENT LETTER 14, COLLEGE TERRACE RESIDENTS' ASSOCIATION, 7/24/00

Response to Comment 14-1

Comment Summary: The comment states that specific thresholds should be established and monitored for traffic, and mitigation steps invoked if these thresholds are exceeded.

As noted in this comment, it is important to have specific thresholds for traffic conditions and to monitor those traffic conditions. Two such thresholds have been identified in the Draft EIR. The first is the intersection level of service standard, which is set by each jurisdiction, as summarized in Table 4.4-14 on page 4.4-42 of the Draft EIR. For intersections within the City of Palo Alto, the standard indicates that there would be a significant impact if project traffic causes a change in level of service from LOS D or better to LOS E or worse. For intersections already at LOS E or LOS F, an increase of critical movement delay by four or more seconds and an increase in the volume to capacity ratio of 0.01 or more would result in a significant impact. For Palo Alto intersections specifically included in the Santa Clara County Congestion Management Plan (CMP), the standard indicates that there would be a significant impact if project traffic causes a change in level of service from LOS E or better to LOS F. For CMP intersections already at LOS F, an increase of critical movement delay by four or more seconds and an increase a change in level of service from LOS E or better to LOS F. For CMP intersections already at LOS F, an increase of critical movement delay by four or more seconds and an increase in the volume to capacity ratio of 0.01 or more would result in a significant impact if project traffic causes a change in level of service from LOS E or better to LOS F. For CMP intersections already at LOS F, an increase of critical movement delay by four or more seconds and an increase in the volume to capacity ratio of 0.01 or more would result in a significant impact if project traffic causes in the volume to capacity ratio of 0.01 or more would result in a significant impact.

Mitigation measure TR-5B described on page 4.4-93 of the Draft EIR identifies a second traffic threshold for the project based on "no net new commute trips" by means of an effective TDM program. To monitor compliance with this standard, a cordon line will be developed to measure all traffic into and out of Stanford. This cordon line will be monitored by a qualified consultant retained by the County. Monitoring is expected on a periodic basis, either yearly or every two years depending on the level of development which has occurred since the last cordon count.

Response to Comment 14-2

Comment Summary: The comment states that specific thresholds should be established and monitored for key indicators such as noise.

Noise criteria are listed in Table 4.12-6 (page 4.12-15) of the Draft EIR. As documented on pages 4.12-18 and 19, the Draft EIR includes mitigation measures to reduce construction related noise levels. However, the Draft EIR indicates that there is the potential for significant and unavoidable construction-related noise impacts.

Response to Comment 14-3

Comment Summary: The comment states that while additional housing is needed, the CP/GUP will impose a disproportionate share of the impacts from construction of the housing on one small portion of Palo Alto and that specific mitigation measures are needed to protect quality of life in College Terrace.

The comment references specific comments under traffic and circulation that are responded to below.

Response to Comment 14-4

Comment Summary: The comment states school mitigation fees with not adequately address the actual impacts to Palo Alto schools, and that the impact on schools should be called significant and unavoidable.

State law provides that the statutory school impacts fees "are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property . . . on the provision of adequate school facilities." (Government Code Section 65995(h); see also Section 65996(b)). In addition to this statutory directive, the Palo Alto Unified School District recently has submitted a letter (see Appendix G – Letter 128) stating that implementation of its agreement with Stanford will fully mitigate all impacts on Palo Alto schools.

Response to Comment 14-5

The comment states that Stanford should prepare an integrated Comment Summary: transportation plan emphasizing transit, transportation demand management, alternate forms of transit, and traffic calming. The comment also supports the City of Palo Alto's desire to evaluate the effects on bicycles and pedestrians when widening intersections. The comment recommends use of roundabouts in place of conventional intersection improvements because they are safer for pedestrians and cyclists as well as handling larger volumes of traffic with less delay than conventional intersections. The comment agrees with the City's desire to have additional analysis in the area of trip generation and inclusion of all Stanford owned lands in the study area. The comment states that "no net new commute trips" policy is of the utmost importance and should be made a condition of any further development approvals. The comment also states that many Stanford automobile commute trips park in local neighborhoods and finish the trip to Stanford by other means and that Stanford should fund a residential parking permit program in neighborhoods adjacent to the campus. Stanford should fund studies to determine what proportion of cut through traffic on neighborhood streets is due to Stanford, and should fund neighborhood traffic calming studies and mitigation measures. The comment suggests that the Traffic Infusion on Residential Environment (T.I.R.E.) rating be used to determine the effects of traffic speeds and volume passing through neighborhoods and expresses concern that existing traffic volumes on Stanford Avenue and El Camino Real would discourage residents of new units from walking or biking. Therefore Stanford should provide significant financial assistance in pedestrianizing Stanford Avenue.

Stanford's TDM program is a transportation plan that already encourages transit usage, provides alternate forms of transit such as the Marguerite shuttle, controls parking, supports bicycles, organizes carpools/vanpools, and includes a guaranteed ride home program. These programs are proposed to be expanded to include such features as universal transit passes, more bicycle parking facilities, showers for bicycle commuters, telecommuting, expanded Marguerite shuttle service, cash incentives, satellite parking facilities, a car-sharing program, and alternative work week schedules.

Design of any of the proposed intersection mitigation measures would take into account preservation of facilities for bicyclists, pedestrians, and transit. For example, any intersection improvements that resulted in a lengthened crosswalk due to additional lanes through the intersection, would also include any necessary modifications to the pedestrian signal timing to ensure adequate time for pedestrians to cross the road. The Draft EIR does not include the design for proposed mitigation measures. The process of designing these mitigation measures will include provisions for avoiding or offsetting any potential impacts to bicyclists, pedestrians, or transit based on conditions at the time of improvement. The design of intersections would also be subject to the approval of the appropriate jurisdiction.

In most cases limited improvements to existing signalized intersection configurations are adequate mitigation. However, a traffic circle is being considered as an improvement at the Arboretum/Galvez intersection rather than a traffic signal. It should be noted that only two of the intersection improvements are Tier 1 mitigation measures. The remainder of the intersection improvements are Tier 2 mitigation measures and would not need to be implemented unless the traffic monitoring program shows that the TDM program fails to meet it target of "no net new commute trips".

It is noted that the comment agrees with the City's desire to have additional analysis in the area of trip generation and inclusion of all Stanford owned lands in the study area.

The County appreciates the stated support of its proposed objective of "no net new commute trips". Part of Stanford's TDM program is the permitting and control of parking on Stanford property. The City of Palo Alto may wish to reinforce Stanford's efforts by implementing its own residential permit parking program in neighborhoods near Stanford. Stanford cannot be directly responsible for maintaining parking programs on property that does not belong to the university.

The Draft EIR already contains provisions for Stanford's participation in and contribution of fair share funding for neighborhood traffic studies and mitigation measures. As indicated in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the city to determine the proportion of cut-through traffic associated with the Stanford campus. Stanford's participation will be coordinated through the County Planning Office. Stanford will then be responsible for its fair share of any mitigation measures that may come out of these studies. The fair share percentage of the improvement cost at any location is defined as being the proportion of traffic at that location which is generated by Stanford. The comment references a 1999 study performed by Fehr and Peers which indicates that 50 to 70 percent of peak hour traffic on some of the interior streets in College Terrace is non-local. However, the comment does not indicate what proportion of non-local traffic is associated with Stanford. It is not uncommon for neighborhoods to experience high rates of nonlocal traffic depending on their location in relation to major transportation corridors or high traffic generators.

The Draft EIR analysis focused largely on intersection operations because that is the standard required by all applicable local agencies for determination of traffic impacts in a Draft EIR. Requiring use of the Traffic Infusion on Residential Environment (T.I.R.E.) index for a Draft EIR is at the discretion of those agencies. However, it should be noted that the T.I.R.E. index is generally not used in EIRs. It is typically used in neighborhood traffic calming studies as a means of correlating easily measured quantitative traffic volumes with qualitative factors such as livability of a street. Detailed traffic studies are required by mitigation measure TR-6B, the T.I.R.E. index would be one way of determining the impacts of specific development proposals allowed under the Community Plan and GUP.

As indicated in Mitigation TR-6B on page 4.4-107 of the Draft EIR, site specific traffic studies will be required by the County prior to construction of certain large projects allowed in the GUP. This specifically includes Stanford Avenue housing as well as other specific projects. These traffic studies will address in detail the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities deemed appropriate by the County Planning Office. Appropriate mitigation measures will be developed in the study, conditioned through the County review and approval process, and implemented by Stanford.

Response to Comment 14-6

Comment Summary: The comment states that the proposed housing development along Stanford Avenue may result in significant impacts to foreground views from College Terrace. Therefore, mitigation measures are required.

Measures proposed in the comment (protection of mature trees and design review) are considered standard procedures for project review within unincorporated Santa Clara County, and are therefore not identified in the Draft EIR as mitigation measures. The proposed faculty/staff housing along Stanford Avenue will be subject to Architectural and Site Approval (ASA) Committee level review at the time of project implementation.

Response to Comment 14-7

Comment Summary: The comment states that the east campus development proposes 1,150 new units with 564 parking spaces. The comment contends that this development would lead to hundreds of new cars seeking parking on neighborhood streets in addition to those who park in neighborhoods and finish their trips to Stanford on the Marguerite shuttle. Stanford should supply funds for a residential parking permit program.

As part of its TDM program, Stanford could need to reduce the attractiveness of single occupant vehicles as a mode of transportation to the campus. One tool for accomplishing this and reducing vehicle trips to the campus is to restrain and control parking. As noted in this comment, Stanford is able to and plans to control parking on University property. However,

Stanford is not directly able to control parking outside of the campus. In order to do so, Stanford will need the assistance of the City of Palo Alto and residents in the neighborhoods bordering Stanford. If the City of Palo Alto is willing to initiate and administer a residential permit parking program in neighborhood, Stanford could participate in establishing and maintaining such a program. By participating in such programs, Stanford would be able to reinforce policies to discourage the use of automobiles and encourage the use of other modes of transportation.

If people already park in neighborhoods and take the Marguerite shuttle to complete their trip, there is a good chance that the same people would use a new satellite parking facility instead. This is particularly true if those drivers are no longer able to park in neighborhoods because of a residential permit parking program. With the proposed TDM program and residential parking permits, policies such as the ban on freshmen parking are intended to have a long-term effect of reducing the dependency on automobiles by Stanford students. Freshmen who become familiar with the use of alternative transportation modes because of the parking ban, may be more likely to continue using such modes in later years instead of immediately becoming dependent on automobiles. Stanford also intends to provide travel alternatives that will be available to all students, reducing automobile dependency.

Response to Comment 14-8

Comment Summary: The comment states strong support for mitigation TR-5B, trip reduction and monitoring. However this should not result in new automobile trips stopping in neighborhoods outside Stanford and continuing the rest of the way to Stanford by alternate means.

Mitigation measure TR-5B would require that Stanford expand its TDM program. As indicated in the Responses to Comments 14-5 and 14-7, Stanford could participate in residential permit parking programs that will reinforce its on campus parking policies and improve the effectiveness of its TDM programs.

Response to Comment 14-9

Comment Summary: The comment states that "No net new commute trips" should also mean that there would be no additional peak hour cut through traffic. Automobile trips stopping in neighborhoods outside Stanford and continuing the rest of the way to Stanford by alternate means should be considered cut through traffic despite the change in mode. The TIRE index should be used to evaluate off peak traffic on residential streets. Stanford Avenue and California Avenue are residential collectors and traffic which uses them to bypass other congestion should be considered cut-through traffic. The comment requests that the mitigation measures should be spelled out and include traffic calming measures on Stanford Avenue. Stanford should pay its fair share based on both its existing and new_traffic generated by the campus and research park. Site specific studies specified by TR-6B will not identify cumulative impacts which should be mitigated.

As previously indicated in the Responses to Comments 14-5, 14-7, and 14-8, which raised the same issue, implementation of a residential permit parking program in the College Terrace neighborhood by the City of Palo Alto would eliminate the issue of nonresidential parking in the

neighborhood. Also, as mentioned before, such programs would also reinforce the effectiveness of Stanford's parking policies and TDM program.

As previously indicated in the response to this same comment by the College Terrace Residents' association (Comment 14-5), the Draft EIR analysis focused largely on intersection operations because that is the standard required by all applicable local agencies for determination of traffic impacts in an EIR. Requiring use of the Traffic Infusion on Residential Environment (T.I.R.E.) index for an EIR is at the discretion of those agencies. The T.I.R.E index is typically used in neighborhood traffic calming studies as a means of correlating easily measured quantitative traffic volumes with qualitative factors such as livability of a street and would probably be applied for all future site specific studies as required by mitigation TR-6B.

Stanford Avenue and California Avenue are collector streets connecting to arterial roadways such as El Camino Real, Junipero Serra Boulevard, and Page Mill Road. As is generally the case with collector streets and arterial roadways, these collector streets are more residential in nature than the arterial roadways to which they connect. This fact may be taken into account by the City of Palo Alto when it determines the study area for any future neighborhood traffic studies for the College Terrace Neighborhood. On page 4.4-106 of the Draft EIR Mitigation TR-6A indicates that Stanford would participate in any such studies as coordinated by the County Planning Office at the time of study initiation.

As indicated previously in the response to Comment 14-5, the Draft EIR contains provisions for Stanford's participation in and contribution of fair share funding for neighborhood traffic studies and mitigation measures. These studies are not appropriate at this time because project specific information such as number of units, access locations, and parking plans are needed to conduct the analysis. As indicated in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the City of Palo Alto to determine the proportion of cut-through traffic associated with Stanford. Stanford's participation will be coordinated through the County Planning Office. Stanford will then be responsible for its fair share of any mitigation measures. The fair share percentage of the improvement cost at any location is defined as being the proportion of traffic at that location which is generated by Stanford, including the Research Park. In accordance with the standard traffic engineering practice for determination of fair shares, Stanford traffic will be defined to be all traffic generated by Stanford. Any monitoring of traffic would be conducted by a qualified and unbiased consultant retained by the County.

As indicated in Mitigation TR-6B on page 4.4-107, the County Planning Office will need to approve the scope of each site-specific traffic study. As part of that process, the County will determine an appropriate means of measuring and mitigating impacts of the Stanford projects. If the County approves the GUP application that is the subject of this EIR, then all components of the GUP will be considered as part of the cumulative development.

Response to Comment 14-10

Comment Summary: The comment states approval that Stanford's construction truck route does not include Stanford Avenue, but expresses concern that TR-7D allows construction deliveries before 8:00 AM before which no construction is allowed in Palo Alto. The comment asserts that

areas adjoining Palo Alto residents should be subject to the same hours of construction allowed by the City of Palo Alto.

The measures outlined in Mitigation TR-7D on page 4.4-109 of the Draft EIR are intended to supplement, not replace, local construction regulations. The mitigation requires that deliveries be targeted to arrive between 9:00 AM and 4:00 PM. This excludes the period before 8:00 AM.

Response to Comment 14-11

Comment Summary: The comment states that mitigation measures proposed in the Draft EIR are "vague in nature" and do not address existing flooding at the points where sub-watershed areas M-3 and M-4 enter the City of Palo Alto storm drain system

Page 4.5-16 in the Draft EIR notes that the capacity of some drainage facilities downstream of the project have been exceeded by previous storm events. However, pursuant to CEQA, the Draft EIR does not propose mitigation for existing flooding problems. Accordingly, as mitigation, the Draft EIR requires that Stanford provide facilities to prevent additional runoff from the proposed CP/GUP development.

In order to provide all of the Draft EIR revisions in one location, responses to this and several other comments regarding historic downstream flooding have been addressed through revision of the Draft EIR below.

The Draft EIR is revised as follows:

Mitigation Measure HWQ-1: Manage Stormwater Runoff, which starts on page 4.5-16, is revised to read:

Mitigation: HWQ-1: Manage Stormwater Runoff

In order to prevent site development from <u>contributing to</u> <u>causing increased</u> downstream flooding due to an increase in peak 100 year storm runoff, <u>Stanford</u> shall accomplish the following:

• <u>Construct and operate</u>, the project would require construction and operation of storm drainage detention facilities within the project area; <u>It is estimated that approximately 22,000 cubic feet (0.5 acre feet) of detention basin capacity would be required to prevent an increase in 100 year 24 hour runoff.;</u>

• Consider site design features that would decrease post-development runoff, including features presented in the Bay Area Stormwater Management Agencies' "Start at the Source – Design Manual for Stormwater Quality Protection and Site Planning for Urban Stream Protection"; and

• Consider the use of diversion of parking lot and building runoff to vegetated swales, pervious pavement, reduced building foot prints, infiltration of storm runoff, and other similar measures to reduce peak runoff rates and increased runoff volumes.

The detention facilities and other site features and measures designed, constructed, and implemented by Stanford shall be sufficient to assure that there is no increase in peak downstream storm runoff following development and that the increased post-development runoff volume does not cause downstream flooding. Santa Clara County shall specify the criteria (including the storm event or events and models) that shall be used by Stanford to design detention facilities, site features, or other measures used to prevent impacts caused by increases in post-development storm runoff. The facilities shall be designed to only temporarily store the storm water runoff and not create extended ponding that could result in mosquito breeding. In establishing the appropriate design criteria (e.g., 100 year, 24 hour storm event), Santa Clara County shall consult with Santa Clara Valley Water District regarding the storm events that Stanford shall use in designing facilities that have sufficient capacity to prevent impacts on downstream storm drainage facilities.

Two alternative approaches are possible for implementation of this <u>mitigation</u> measure:

(a) Stanford shall prepare a site-specific hydrology and drainage study for each individual building project. Based on the results of this study, Stanford shall design, construct, and maintain project specific storm drainage system improvements, site features, or measures include detention facilities that are sufficient to assure that the peak 100-year storm runoff leaving the project area does not increase and that the increased runoff leaving the project area does not cause downstream flooding. Individual detention facilities, site features, or measures may serve more than one building project, but Stanford must demonstrate adequate detention-capacity to prevent contain increased runoff as part of the project application. The All detention facilities shall be designed to only store the storm water runoff temporarily and not create extended ponding that could result in mosquito breeding. Prior to storm water facility construction, Santa Clara County shall approve the proposed improvements.

(b) As an alternative to preparing site-specific studies for each project, Stanford can elect to prepare a hydrology and drainage study for all or a specified portion of a particular watershed area. Based on the results of this study, Stanford shall design, construct, and maintain storm drainage improvements that include on-site detention facilities, site features, or measures sufficient to assure that the peak 100-year storm runoff leaving Stanford lands covered by the study does not increase as a result of new development, and that the increased runoff does not cause downstream flooding. After approval of such stormwater facility construction by Santa Clara County, no further site-specific hydrology and drainage studies would be required for new development the sites covered by the study, provided that the stormwater facility is in place prior to issuance of new building permits in the <u>sub</u>area addressed by the study.

Response to Comment 14-12

Comment Summary: Mitigation to replace sewer lines at Yale Street and Stanford Avenue would have traffic, noise and air quality impacts that must be mitigated.

All construction related to development under the GUP would be subject to mitigation measures presented in the Draft EIR. This would include construction of any related infrastructure improvements such as the replacement of sewer lines, if needed. Dust control measures are described on page 4.11-9 of the Draft EIR. As described on page 4.12-18 of the Draft EIR, limits on hours of construction would be imposed as part of the County of Santa Clara Noise Ordinance. Mitigation measures for traffic impacts during construction are described on pages 4.4-108 through 4.4-111. These measures would protect bicycle and pedestrian access, would establish appropriate truck routes, and would require repair of any damaged roadways.

Response to Comment 14-13

Comment Summary: The comment states that the vehicle mix used in the EIR to estimate emissions associated with development under the GUP is not consistent with what is seen in Palo Alto streets.

The vehicle mix described in the Draft EIR was not intended to describe the existing mix of the Palo Alto community, but rather the projected mix associated with the increased number of new residents and new students. The vehicle mix used in the Draft EIR is the standard vehicle mix used in the Emfac 7g model. The comment provides no data to support a different vehicle mix than that described in the Draft EIR for the additional campus population. The Draft EIR does recommend continuation of No Net New Commute Trips, based on implementation of Stanford's existing and expanded TDM program.

Response to Comment 14-14

Comment Summary: The comment states that the existing wastewater pipe junction at Yale Street and California Avenue has an odor problem.

The wastewater pipe junction mentioned in the comment is an existing source of odor. However, this location is not within the project area. Further, the project would not be expected to increase the level of odor from this source. The surface area of waste exposed to air would not increase sufficiently under the project to change the generation of odors. However, as noted in the comment, the proper complaint mechanism to gain resolution for the existing odor source is through BAAQMD.

Response to Comment 14-15

Comment Summary: The comment expresses concern about noise impacts to College Terrace, and requests discussion of backup beepers on construction trucks. The comment also suggests that construction adjacent to Palo Alto residential neighborhoods should use the most restrictive hours of the County and City construction ordinances. Pages 4.12-17 and -18 address the potential construction impacts at the residences along Stanford Avenue. These residences represent the College Terrace area. The residents directly across Stanford Avenue are likely to be exposed to construction noise levels of 75 dBA or higher during the loudest construction periods (e.g. site preparation). Construction noise would be a significant unavoidable impact at this area.

Table 4.12-7 lists the estimated construction equipment noise levels. As shown in the table, the noise contribution from trucks is not as loud as other noisier equipment (e.g. jackhammers and graders). Trucks and other heavy construction equipment such as backhoes, front loaders, and graders have backup alarms. These backup alarms can be adjusted to minimize noise impacts. However, the backup alarms should comply with OSHA safety requirements so that it would be audible to the construction workers. With the exception of a few types of heavy equipment such as graders and excavators, the noise levels of these alarms could be maintained lower than 80 dBA at 50 feet from the equipment. Provided that the allowable limit is observed, the backup alarm noise level at the property line would be less than 80 dBA.

Using the most restrictive construction hours of Santa Clara and County and Palo Alto, the proposed construction hours will be 8:00 AM to 7:00 PM Monday to Friday, 9:00 AM to 7:00 PM on Saturday, and no work on Sundays or holidays.

The Draft EIR is revised as follows:

Add the following bullet to the list of measures included in NOISE-1 (Page 4.12-18).

• For construction areas adjacent to the Palo Alto city limit, construction hours shall be limited to 8:00 AM - 7:00 PM, Monday through Friday, 9:00 AM - 7:00 PM, Saturday, and prohibited on Sundays and holidays.

Response to Comment 14-16

Comment Summary: The comment requests evaluation of noise impacts of sports facilities.

Residential areas east of Stanford Avenue are at least half a mile away from the sports facilities. The construction of a new indoor arena or improvements of the football stadium are unlikely to cause any significant noise impacts. Loud crowds or speakers during football games or concerts would be audible and might be nuisance to some sensitive residents, however, this is an existing condition. The proposed new arena would be an enclosed facility, and is not expected to generate significant noise outside of the facility. A site-specific noise study would be necessary as part of the environmental documentation to be completed before the expansion or construction of any sports facilities. The County has and will continue to conduct environmental analysis for upgrades to athletic facilities including noise analysis. Specific noise incident complaints should be directed to the County Department of Environmental Health.

Response to Comment 14-17

Comment Summary: The comment states that noise from traffic should be evaluated based on current speeds and that traffic calming should be required as a noise mitigation.

÷

Ambient noise levels were measured at Stanford Avenue (Receptor Site 3), and reflect the actual traffic noise levels that currently exist in the area. The combination of traffic volumes, Level of Service (LOS), and vehicle speeds determines the overall traffic noise levels. There are six different LOS designations (A through F). These designations correspond to the lightest to the heaviest traffic volumes per lane. As the traffic volumes get heavier, the vehicle operating speeds get lower; and vice versa. The traffic noise level becomes the highest under LOS C. The noise analysis used the traffic volumes of LOS C with the posted speed of 25 mph to obtain the highest traffic noise levels. Traffic speed would be 35 mph when there are fewer vehicles than those creating a LOS of C. Using low volumes and higher speed would not generate higher traffic noise. Refer to Response to Comment 14-9 regarding traffic calming measures. The noise analysis indicates that additional traffic from the project would not result in a noticeable increase in noise (pages 4.12-20 through 4.12-22).

COMMENT LETTER 15, JEB EDDY, 7/24/00

Response to Comment 15-1

Comment Summary: The comment expresses support for a Reduced Project.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

COMMENT LETTER 16, BARBARA PICKERING, 7/24/00

Response to Comment 16-1

Comment Summary: The comment supports the limitation of Stanford's development on the Dish Hill area, and for maintaining it as an "open space". In addition, the comment supports access for dogs in this area, and suggests that impacts to California tiger salamander will be greater from proposed GUP development than from dogs.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 16-2

Comment Summary: The comment states that there is little impact to salamanders of allowing dogs at "Dish Hill" and that the impact of filling their natural lake would be greater.

The University's policy regarding access to the Dish area is not a part of the CP/GUP. The project does not propose filling of Lake Lagunita. Mitigation measures for California tiger salamander are included in Section 4.8 of the Draft EIR. Also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

COMMENT LETTER 17, DAVID E. WILKINS, 7/25/00

Response to Comment 17-1

Comment Summary: The comment states that the golf course has recreational, open space and environmental protection values, and that elimination of Hole #1 would cripple the golf course.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course.

Response to Comment 17-2

Comment Summary: The comment opposes use of golf course hole number one for housing, and requests higher density housing.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 1, Statement for or Against the Project or Project Components; Master Response 4, Alternative Housing Sites and Master Response 3, Intensified Development Alternative.

COMMENT LETTER 18, JEAN C.R. FINNEY, CALIFORNIA DEPARTMENT OF TRANSPORTATION, 7/26/00

Response to Comment 18-1

Comment Summary: The comment states that Volume II, Appendix C2 (Level of Service Calculation) turning movement volumes in the Signalized Intersection Summary for Intersection #20 (Middlefield Road/Willow Avenue) should be for Intersection # 19 (Middlefield Road/University Avenue). This mistake has been carried out throughout the Appendix for future year 2010. In addition, the comment states that the Alpine Road/Interstate 280 interchange should be included in the level of service analysis.

The comment correctly identifies an error that was corrected in the Draft EIR text, but not in the appendix. This error has been corrected.

The study area established for the project was developed based on previous analyses for the immediate area, requirements of the Santa Clara County CMA, the scoping sessions held for this project, and consultation with adjacent jurisdictions. Traffic from the north on I-280 will tend to use the Sand Hill Road interchange. Traffic from the south on I-280 will primarily use the Page Mill interchange. Therefore, an expansion of the study area at this time is not considered warranted. Further, Caltrans did not request analysis of this intersection at the time of their response to the Notice of Preparation.

COMMENT LETTER 19, JON CORELIS, 7/27/00

Response to Comment 19-1

Comment Summary: The comment states support for the comments made by the College Terrace Residents Association.

Refer to the Responses to Comments to Letter 14, which was submitted by the College Terrace Residents Association. Each comment is addressed there.

COMMENT LETTER 20, MARK SABIN, GEORGIE GLEIM AND CHARLOTTE CAGAN, PALO ALTO CHAMBER OF COMMERCE, 7/28/00

Response to Comment 20-1

Comment Summary: The community expresses support for the Community Plan.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

COMMENT LETTER 21, ROBERT AUGSBURGER, 7/28/00

Response to Comment 21-1

Comment Summary: The comment states that there should be more housing alternatives proposed to ensure that Stanford's academic expansion is not constrained by housing requirements imposed in the housing linkage mitigation measure.

The alternative suggested in the comment (housing at sites near Page Mill Road) is discussed on page 7-58 of the Draft EIR, as an alternative considered, but rejected. As noted on page 7-58, "This alternative was determined to have potentially significant impacts to open space. A school site at this location was found to have the potential for significant biological impacts to red-legged frog." Refer to Master Response 4, Alternative Housing Sites and Response to Comment 8-3 for further discussion.

The Draft EIR includes a mitigation measure (page 4.3-18) that would require construction of housing units as academic expansion occurs. The proposed mitigation measure states that "Stanford shall continue to identify additional sites, on- and off-campus, that are suitable for housing development and could accommodate additional housing units over and above the number included in the project." Stanford will not be limited to the housing sites identified in the GUP application. However, each site proposed will require site-specific environmental review and mitigation of any site-specific impacts.

COMMENT LETTER 22, CHRISTY TELCH, 7/29/00

Response to Comment 22-1

Comment Summary: The comment states that the County should oppose Stanford's plans, which would result in traffic congestion, and set aside the foothills as permanent open space.

Refer to Master Response 9 – Additional Open Space Protection. Traffic impacts are addressed in Section 4.4 of the Draft EIR.

Response to Comment 22-2

Comment Summary: The comment states that an alternative site should be identified for the Carnegie Foundation.

The Carnegie Foundation project is not included in the analysis prepared for the Stanford CP/GUP, because the project is being processed as a separate action. Approval of the CP/GUP does not commit the County to approve the Carnegie Foundation project, nor does approval of the Carnegie Foundation project commit the County to approval of the CP/GUP. The Carnegie Foundation project is being processed under the existing General Plan and under its own use permit. The Carnegie Foundation project and alternatives have been evaluated in the Carnegie Foundation Research/Office Facility Draft and Final EIR. The project is however, considered in the cumulative analysis for the CP/GUP EIR.

Response to Comment 22-3

Comment Summary: The comment states that Stanford's plan to re-classify the golf course to allow for housing development is a potential major change in land use and should be opposed.

The Draft EIR includes analysis of proposed CP land use changes to the golf course. The Draft EIR concludes that changing the land use designation of the golf course would result in significant open space impacts south of JSB. In addition, the Draft EIR identified alternative components that would protect the majority of the golf course as campus open space (LU-A), and would place it outside of the academic growth boundary (AGB-A). These alternative components have been identified as part of the Environmentally Superior Alternative on page 7-57.

Because it is not yet known whether the Board will adopt the environmentally superior alternative, it is important to be specific regarding the EIR's analysis of golf course land north and south of JSB. Both alternative growth boundaries AGB-A and AGB-B eliminate the open space impacts, as would an alternative that follows AGB-A around the existing think tanks south of JSB and then follows AGB-B along JSB to cut the golf course in half.

The Draft EIR explains that removal of the open space protections afforded by the existing land use designation in the Lathrop Development District, which includes the portion of the golf course that is south of JSB, could allow future development in that area which could have significant open space impacts. While only 20,000 square feet of development would be allowed under the GUP, the change in land use designation may make it easier to develop this area in the

•

future. Thus, the Draft EIR identifies a significant open space impact from this change in land use designation and discusses alternative Academic Growth Boundaries and land use designations that could reduce this impact.

The Draft EIR also includes analysis of proposed GUP housing development on Hole #1 of the golf course, and subsequent realignment of holes one through seven. The Draft EIR did not identify any significant impacts associated with this component of the GUP. Further discussion of this component of the GUP is provided in Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course.

Response to Comment 22-4

Comment Summary: The comment states that Stanford's plans for development would create increased traffic and congestion. This would change the quality of life in this area.

Stanford's efforts to increase on-campus housing for students and faculty are consistent with creation of a fully-functional academic community. By moving students from off-campus housing to on-campus housing, Stanford reduces the proportion of its trips that will need to pass outside of the campus environs. Thus, while traffic may increase locally at specific intersections, for the overall regional network vehicle hours and vehicle miles traveled will decrease because of shorter and alternative mode commuter trips. Even with the expected growth in the student population, the Draft EIR establishes a goal of "no net new commute trips". This is being done in an effort to help preserve the quality of life in this area.

COMMENT LETTER 23, ERIC FERTIG, 7/30/00

Response to Comment 23-1

Comment Summary: The comment states that mitigation for the proposed GUP/CP must include a commitment to maintain open space and to continue to maintain public access to the foothills west of Junipero Serra Blvd.

Refer to Master Response 9, Additional Open Space Protection.

Page 4.2-22 of the Draft EIR identifies effects to recreational facilities as a significant impact. The Draft EIR states that the CP/GUP will increase the demand for such facilities. In order to mitigate the identified impact, the Draft EIR includes a mitigation measure to require Stanford to dedicate the trail easements included in the County Trails Master Plan. Refer to Mitigation Measure OS-3 on page 4.2-22 of the Draft EIR. These trails would be operated and maintained for public use.

Response to Comment 23-2

Comment Summary: The Academic Growth Boundary should be consistent with Palo Alto's Urban Service Boundary along Junipero Serra Blvd. and should be made permanent. The entire golf course should remain outside the boundary and remain protected from development.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Refer to Response to Comment 22-3. Further discussion of the golf course realignment is provided in Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course.

Response to Comment 23-3

Comment Summary: The proposed Community Plan land use designation (Academic Campus) for the Lathrop Development District is inconsistent with the existing low-intensity structures and access roads in the area. The re-designation of Lathrop also sets a precedent for future development west of Junipero Serra Blvd.

Refer to Response to Comment 22-3. The Draft EIR analysis concludes that proposed GUP development within the Lathrop District would be consistent with the existing development. However, the Draft EIR also concludes that the proposed land use designation of Academic Campus could lead to further development with subsequent development proposals that would not be consistent with the existing development level of the District. Therefore, the Draft EIR identified the proposed change as a significant and unavoidable impact.

Response to Comment 23-4

Comment Summary: The area outside the Academic Growth Boundary should be changed from "Academic Reserve and Open Space" to "Open Space and Field Research" as recommended by County staff.

Alternative component LU-C would designate lands proposed as Academic Reserve and Open Space in the CP as Open Space and Field Research. The Draft EIR evaluates alternative component LU-C. LU-C is described on page 7-42 and shown on Figure 7-2 (note: Figure 7-2 has been corrected to accurately show the locations of proposed land use alternatives. The revised figure is included in Chapter 13 of this Final EIR).

Response to Comment 23-5

Comment Summary: The comment asserts that the Stanford property is designated as a California State legislative refuge based on its value as a wildlife study area and requests that the EIR and Community Plan identify the refuge and value of its wildlife resources.

The Game Refuge designation does not convey any open space protection to the area. The Draft EIR analyzed the project's potential impacts on wildlife, and the property's Game Refuge status does not alter this analysis.

Response to Comment 23-6

Comment Summary: The comment states that the Draft EIR does not adequately address Stanford's foothills access policy as a significant impact or mitigation issue.

Refer to Response to Comment 23-1.

COMMENT LETTER 24, YORIKO KISHIMOTO, 7/30/00

Response to Comment 24-1

Comment Summary: The comment states that new parking spaces should be limited to no more than 2,267 spaces to avoid creating a surplus that could undermine trip reduction efforts.

Limiting new parking to 2,267 spaces so as to maintain the current parking ratio of 1.03 spaces per student, faculty, and staff is discussed under TR-5B which is intended to reduce project trips. This would be used in conjunction with other aspects of the TDM program to meet the goal of "no net new commute trips".

Response to Comment 24-2

Comment Summary: The comment states that Stanford should do more to minimize traffic impact/parking for the proposed arena and performing arts center, and requests a commitment to frequent shuttles to Caltrain, pay parking, and effective public relations campaign to minimize new car trips, even during off-peak hours.

As indicated in Mitigation TR-6B on page 4.4-107 of the Draft EIR, site specific traffic studies will be required by the County prior to construction of certain projects allowed in the GUP. This would include the proposed arena and performing arts center as well as other projects. These traffic studies will address in detail the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities deemed appropriate by the County Planning Office. Appropriate mitigation measures will be developed in the study, conditioned through the County review and approval process, and implemented by Stanford. These mitigation measures could include methods of maximizing utilization of transit and providing shuttle connections such as those to Caltrain.

The Draft EIR studies traffic effects of the arena and performing arts center and analyzes their effects according to the County's standard significance criteria. Those criteria determine significance under peak hour conditions, which represents a worst-case scenario for traffic congestion at intersections. Potential arena and performing arts center traffic was layered on top of commute traffic. Additional analysis of the off-peak traffic effects of a sports arena and/or performing arts center is not appropriate until a site-specific proposal to construct those projects is presented to the County. As indicated in Mitigation TR-6B on page 4.4-107 of the Draft EIR, when a specific project is proposed, the County will review the project to determine whether it is within the scope of the program studied in the EIR, and whether it will result in any new or substantially more severe site-specific impacts. At that time, factors such as seating capacity, location, and proposed hours of operation can be used to determine whether additional traffic impacts would occur and whether additional mitigation is warranted.

Response to Comment 24-3

Comment Summary: The comment requests that parking structures be analyzed in a site-specific study, expressing concerns about additional noise pollution and safety problems on Embarcadero Road.

As indicated in the Response to Comment 24-2, Mitigation TR-6B on page 4.4-107 of the Draft EIR, requires site specific traffic studies prior to construction of certain large projects allowed in the GUP, including parking structures. Thus the parking structure would be studied in detail to determine effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities deemed appropriate by the County Planning Office. If new or substantially more severe impacts would occur, appropriate mitigation measures will be developed in the study, conditioned through the County review and approval process, and implemented by Stanford.

Response to Comment 24-4

Comment Summary: The comment states that there is a need for better mitigation for bike/pedestrian crossings at El Camino at intersections near Stanford. People must cross El Camino to get from the train station or Palo Alto to Stanford. Concerns about safety and noise may encourage people to take their cars rather than walk or bike.

At intersections without protected left turn signals on El Camino Real, vehicles may turn left from El Camino Real after yielding the right of way to through vehicles on El Camino Real and pedestrians on the parallel crosswalks. For a street carrying as much through traffic as El Camino Real, left turns are only likely to be possible at the end of the green phase. The green phase for El Camino Real should be long enough for pedestrians starting at the beginning of the phase to cross before the end of the phase. If this problem occurs in the future, intersections with impacts may have their green pedestrian signal time shortened and their flashing red time correspondingly increased. This would encourage pedestrians not to begin crossing the street at a time when they are likely to still be in the crosswalk near the end of the phase when vehicles are likely to be turning left across the crosswalk.

As indicated in Mitigation TR-5B on page 4.4-93 of the Draft EIR, part of Stanford's TDM program would be to encourage the use of bicycles, walking, and other modes of transportation instead of automobiles. One objective of these measures would be to overcome existing disincentives to walking and biking.

Response to Comment 24-5

Comment Summary: The comment supports the concept of "permanent" open space in the foothills as partial mitigation for the dense development proposed.

Refer to Master Response 9, Additional Open Space Protection.

۰.

COMMENT LETTER 25, DEANNA MANN, 7/31/00

Response to Comment 25-1

Comment Summary: The comment opposes use of golf course hole number one for housing, and requests higher density housing.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; Master Response 4, Alternative Housing Sites; and Master Response 8, Historical Significance of Golf Course.

COMMENT LETTER 26, MARK LERNER, 7/31/00

Response to Comment 26-1

Comment Summary: The comment states that maintaining open space is key to quality of life in this area. Once development starts west of the foothills, it will be hard to stop it.

Refer to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 27, KENT KAISER, 7/31/00

Response to Comment 27-1

Comment Summary: The comment states that Stanford should consider alternatives to placing housing on the golf course, including a site that has received preliminary approval for the Hewlett Foundation.

The Hewlett Foundation leasehold is a portion of the former Meyer-Buck Estate, which has two separate portions, each designated by San Mateo County for different zoning categories. The portion of the property where the Hewlett Foundation headquarters and the historic Meyer-Buck House are located is zoned Residential Estates, which allows for a single primary dwelling unit and accessory structures, or with a Special Use Permit, the development of schools or charitable institutions such as the Hewlett Foundation. The Hewlett Foundation has secured a Special Use Permit from San Mateo County and a lease from Stanford University and thus the Hewlett Foundation site is not available for housing development for the foreseeable future. The remaining undeveloped portion of the property is zoned for single family housing with a minimum lot size of 10,000 square feet. This site has been identified as a possible site for additional future faculty/staff housing in the Draft EIR on page 7-59.

The Alternatives chapter of the Draft EIR explains why numerous off-site housing alternatives were rejected from further consideration. The County does not have jurisdiction over those sites, and Stanford's ability to obtain approvals to develop housing at those sites is speculative. However, in recognition of the need for housing in the region, the Draft EIR includes mitigation measure GI-1, which requires Stanford to continue to work with nearby cities to identify additional sites on- and off-campus that would be suitable for housing development.

COMMENT LETTER 28, SALLY BARLOW-PEREZ, 7/31/00

Response to Comment 28-1

Comment Summary: The comment states that the open space represented by the land around the dish can never be replaced, and supports ending development at Junipero Serra Blvd.

Refer to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 29, ALLAN ABBOTT, 7/31/00

Response to Comment 29-1

Comment Summary: The comment states that the proposed project will raise traffic congestion and air pollution carting players from the clubhouse to the "new" first hole.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign. The golf course will be redesigned to maintain close proximity to the club house for the Hole #1 tee box. Golf cart traffic would not affect public streets, or raise traffic congestion. Measureable impacts to air pollution would not be expected to occur.

Response to Comment 29-2

Comment Summary: The comment asserts that San Francisquito Creek will be severely impacted by the proposed housing construction at the golf course, and that Stanford needs to build up and not out.

The Draft EIR has evaluated impacts to riparian habitat and has determined that with mitigation, impacts would not be significant. In fact, two existing in-stream barriers to fish migration will be removed in conjunction with the golf course redesign (redesign is linked with housing construction). Possible water quality impacts having to do with proposed housing are addressed in Section 4.5 of the Draft EIR, and are governed by the provisions of the respective NPDES Permit and RWQCB Section 401 Certification for each project, as needed. Development of housing on the golf course (with the exception of Hole #1) was not part of the proposed project, but was evaluated as an alternative.

Please refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 3, Intensified Development Alternative.

COMMENT LETTER 30, ALLEN CYPHER, 7/31/00

Response to Comment 30-1

Comment Summary: The comment states that the Dish area should be permanently protected as open space, but it should be done in a way that makes it "accessible", i.e. open to the public, dogs allowed, and that people not be confined to walking on the single paved path.

Refer to Master Response 9, Additional Open Space Protection and Response to Comment 23-1. Stanford's policy regarding access to the Dish area is not part of the CP/GUP.

Response to Comment 30-2

Comment Summary: The comment would like to see Stanford's development constrained within Palo Alto's urban growth boundary, nearer to El Camino Real and away from the golf course.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

COMMENT LETTER 31, NILS DAVIS, 7/31/00

Response to Comment 31-1

Comment Summary: The comment is in agreement with comments made by the City of Palo Alto regarding school impacts and states that the Draft EIR should provide a more viable school alternative other than Deer Creek; the site should be within a closer proximity to the population and the Palo Alto urban service area.

Refer to Master Response 1, Statements for or Against the Project or Project Components. It is beyond the scope of this EIR to evaluate alternative school sites for the Palo Alto Unified School District. For discussion of issues raised by the City of Palo Alto regarding schools refer to responses to the letter from the City of Palo Alto, including Response to Comment 94-26.

Response to Comment 31-2

Comment Summary: The comment states that the Old Mayfield School site at Page Mill and El Camino should be considered for a new middle school.

Refer to Master Response 1, Statements for or Against the Project or Project Components. This site is outside of the CP/GUP project area.

Response to Comment 31-3

Comment Summary: The comment states that there are significant issues including additional traffic especially with the proposal to put the middle school in the Terman site, and the proposal to put the district offices on or near "Strawberry Hill" near Gunn.

The Terman school site and relocation of Palo Alto Unified School District offices are not part of the current CP/GUP proposal.

COMMENT LETTER 32, HERB BOROCK, 7/31/00

Response to Comment 32-1

Comment Summary: The comment states that Stanford should be required to abide by the conditions for golf course development as set forth in Santa Clara County ordinance code, and
that the golf course and all lands that could be used for a golf course be designated as a Medium Scale Agricultural land use.

This comment does not address the analysis contained in the Draft EIR. Refer to Master Response 1, Statements for or Against the Project or Project Components. Although reconfiguration of the golf course is a component of the proposed project, no new golf course development is proposed. In addition, the zoning regulations cited in the letter apply only to areas designated medium scale agriculture and zoned A: Exclusive Agricultural. These designations do not apply to Stanford.

Response to Comment 32-2

Comment Summary: The comment states that the GUP is the first time that "safety" instead of "development" has been given as a reason to realign Campus Drive East, and states that since the Draft EIR does not identify specific safety problems at this intersection, the realignment should be prohibited.

The references in this comment indicate that Campus Drive East needs to be realigned to form a 90 degree intersection with Junipero Serra Boulevard for safety reasons. The documents also refer to a need to extend Campus Drive East. It is important to differentiate between the realignment of the existing portion of Campus Drive East, and the extension of Campus Drive East to the south of Junipero Serra Boulevard. In particular, the statement in the document referenced in the comment that "the extension of Campus Drive East would not occur until needed for access to future development" does not influence or prevent the realignment of the existing portion of Campus Drive East to form a 90 degree "T" intersection.

Although not specifically stated in the earlier documentation associated with Stanford's proposal, one of the primary reasons for changing any angle intersection to a "normal" 90 degree configuration is to improve safety and operations. For example, a 90 degree intersection has shorter cross walks resulting in improved safety for bikes and pedestrians. A 90 degree intersection also provides better sight lines for drivers, again resulting in improved safety for all users of the intersection. A 90 degree intersection also requires vehicles to slow to execute a turn which also increases safety. Thus, "development" is not a reason for the realignment, which is proposed without extension of Campus Drive East and additional development south of Junipero Serra Boulevard. There appears to be no valid reason to prohibit the realignment.

Response to Comment 32-3

Comment Summary: The comment states that the Palo Alto City Council should initiate a rezoning of the DC Powers site to OS and that Stanford should dedicate Coyote Hill and the adjacent parcels to permanent open space.

The referenced sites are outside of the CP boundary and are therefore outside of the scope of the Draft EIR. Further, the CP/GUP does not propose any physical or land use changes to sites located in Palo Alto.

÷

Response to Comment 32-4

Comment Summary: The comment states that Stanford should be required to agree to a 99-year conservation easement for the Jasper Ridge Biological Preserve.

The referenced site is outside of the CP boundary and is therefore outside of the scope of the Draft EIR. Further, the CP/GUP does not propose any physical or land use changes to the Jasper Ridge Biological Preserve.

Response to Comment 32-5

Comment Summary: The comment states that housing sites D and I and part of E are located outside of Palo Alto's urban service area and within the historic arboretum and therefore development should not be allowed.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Proposed housing sites D and E are not located within the arboretum. Site I is located immediately adjacent to the lands known as the Arboretum. From an historic land use perspective, while Site I exhibits the same landscape character as the adjacent Arboretum, the site is surrounded on three sides by urban development and is defined by an historic road alignment. Maintenance of the historic edge following the former road alignment, as designated in the proposed Campus Open Space designation, will preserve the integrity of the Arboretum. These parcels are located within existing Special Condition Area A, which is proposed to be eliminated under the CP/GUP. Please refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 32-6

Comment Summary: The comment provides recommended phasing of proposed GUP housing development.

Refer to Master Response 1, Statements for or Against the Project or Project Component and Master Response 4, Alternative Housing Sites.

Response to Comment 32-7

Comment Summary: The comment states that Stanford should be required to designate clusters of foothill lands (10 percent of the total) for development and permanently remove the remaining lands from development, that Palo Alto should rezone the DC Powers site from PC to OS, and that Palo Alto should prezone the 1,175 acres of unincorporated alienable land to either OS or AC to ensure long term protection.

Refer to Master Response 9, Additional Open Space Protection.

The DC Powers site is located outside of the CP boundary and is therefore outside of the scope of the Draft EIR. Further, the CP/GUP does not propose any physical or land use changes to sites located in Palo Alto.

Whether or not the land can be sold is not a determining factor of when it should be annexed to Palo Alto. Land use determines whether it should be annexed to the City of Palo Alto. The CP provides land use designations for all foothill lands within Santa Clara County. These designations would apply no matter who owns the land. Land use regulations are applicable to the land, not to the owner.

Response to Comment 32-8

Comment Summary: The comment states that the July 18 2000, staff report to the Menlo Park City Council suggests that the Draft EIR presumes that none of the east-west through movements on Sand Hill Road through the Santa Cruz intersection would shift to the Campus Drive West-Alpine corridor as a result of the new roadway. This is illogical and invalidates the traffic component of the analysis. It is evident that the mitigation benefits of the extension would be considerably greater than indicated in the Draft EIR. The 1971 Stanford University Land Use Policy/Plan recommended extending Foothill Expressway from Page Mill Road to Alpine Road about half a mile south of the Alpine/Junipero Serra/Santa Cruz intersection to solve the problems of that intersection. The foothill Expressway extension would create space for campus expansion west of Junipero Serra Boulevard. An extension of Campus Drive West would intersect the extension of Campus Drive West at the southeast corner of the golf course. Traffic from Alpine Road could then reach the main campus by using the proposed road extensions identified in Preliminary Land Use Alternative D of the Land Use Policy/Plan.

The Draft EIR shift of traffic from Sand Hill Road to the new roadway follows a principle whereby drivers will use the shortest or best path available to them, and will never take a route that is worse for them (i.e., out of direction) merely to improve traffic for other vehicles. In particular vehicles that are headed for I-280 northbound will not detour to a freeway entrance farther to the south (i.e., from Sand Hill Road to Alpine Road), and vehicles that are headed for I-280 southbound will not detour to a freeway entrance farther to the north. The Sand Hill/Santa Cruz intersection can be viewed as a final decision point for traffic travelling to the I-280 interchanges. Northbound traffic will use Sand Hill Road and southbound traffic will use Alpine Road. It would be completely illogical to presume that any southbound traffic now using Sand Hill Road to reach I-280 and would shift to the new roadway. Instead, that southbound traffic now uses either Sand Hill Road (east of Santa Cruz Avenue) or Junipero Serra Boulevard (north of Campus Drive West) to reach Alpine Road and I-280. Thus, the new roadway would shift traffic off of Sand Hill Road (east of Santa Cruz Avenue) and Junipero Serra Boulevard Boulevard (north of Campus Drive West). This shift takes a great deal of traffic off of Sand Hill Road (east of Santa Cruz Avenue). To shift more traffic from this roadway might overestimate the benefits of the new roadway. Although there might be some minor secondary traffic shifts as a result of the new road, it is problematic to project whether these shifts would add traffic to Sand Hill Road (east of Santa Cruz Avenue) as a result of latent demand replacing some of the displaced traffic on Sand Hill Road, or if there would be some other shift as traffic flows reach equilibrium. Therefore, speculative secondary traffic shifts were not addressed by the analysis.

The Foothill Expressway extension identified 29 years ago by the Stanford Land Use Policy/Plan, at a time when environmental issues were not viewed in the same manner as they are today, was never built and would provide no significant advantages for the Sand Hill Road and Alpine Road corridors as compared to the new roadway discussed in the CP/GUP Draft EIR.

1

.

Response to Comment 32-9

Comment Summary: The comment states that Stanford should annex their residential area to Palo Alto so Stanford faculty and staff can have the right to enter Foothills Park. In addition, the comment provides background on past planning activities for foothill access.

The comment does not address the Draft EIR or the project description. Therefore, no response can be provided. Stanford's policy regarding access to the Dish area is not part of the CP/GUP.

COMMENT LETTER 33, JACK TOHANER, 7/31/00

Response to Comment 33-1

Comment Summary: The comment recommends a "permanent green line" at Junipero Serra Boulevard.

The Draft EIR evaluated an Academic Growth Boundary (AGB) along Junipero Serra Boulevard. Refer to the description and analysis of alternative component AGB-A on Page 7-41, Table 7-3 of the Draft EIR. Refer to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 34, ASHOK VYAS, COUNTY OF SANTA CLARA ROADS & AIRPORTS DEPARTMENT, 8/1/00

Response to Comment 34-1

Comment Summary: The comment recommends that the Draft EIR also include intersections on Foothill Expressway and Page Mill Road to assess the traffic impacts due to the Project.

These intersections were not included with the other 43 intersections selected for evaluation at the beginning of this study. The major intersections of ECR/Page Mill and JSB/Page Mill were analyzed in the Draft EIR. Other intersections along these streets are more reflective of traffic accessing the Research Park rather than the project area. Minor local streets that are not immediately adjacent to the project area are not typically included in this type of study. Further, the County Roads and Airports Department did not ask that these intersections be studied in their response to the Notice of Preparation.

Response to Comment 34-2

Comment Summary: The comment quotes the Draft EIR as stating that two County intersections, i.e., Junipero Serra Boulevard/Page Mill Road and Junipero Serra Boulevard/Stanford Avenue would be significantly impacted. Since Tier 2 intersection capacity expansion measures are difficult to implement, it is stated that Stanford will be required to provide their fair share contribution.

Stanford would be required to pay fair share contributions toward capacity expansion measures at these intersections if the "no net new commute trips" goal is not achieved.

Response to Comment 34-3

Comment Summary: The comment states that on page 4.4-103 of the Draft EIR, it is indicated that the County has no authority to require improvements at the Junipero Serra Boulevard/Page Mill Road intersection. The text should be revised to state that the intersection improvement is within the County jurisdiction and the County has authority to require the implementation of the mitigation measures.

The Draft EIR shall (page 4.4-103) be revised as follows:

Junipero Serra Boulevard and Page Mill Road (Congestion Management Plan in Palo Alto). Mitigation at this intersection would require adding a second southbound right turn lane. This mitigation is considered technically feasible. This improvement is within the jurisdiction of the City of Palo Alto, and Santa Clara County, which has no authority to require improvements the implementation of mitigation measures at this location. This improvement should be considered a Tier 2 improvement.

Response to Comment 34-4

Comment Summary: The comment states that pedestrians cross Junipero Serra Boulevard at various uncontrolled locations between Stanford Avenue and Campus Drive, and the Draft EIR needs to address the impacts of project generated traffic on pedestrians and bicycles.

As indicated on page 4.4-89 of the Draft EIR in the discussion of Impact TR-2, and referenced in the Response to Comment 24-4, pedestrian and bicycle travel ways would not be affected by the project. At the current level of project definition, there would not be any closures to existing paths and access would not be reduced, therefore the impact would be less than significant. Potential impacts to pedestrian and bicycle travel on Junipero Serra Boulevard will be based on an increase in the potential conflicts between vehicles and pedestrians/bicyclists. Any increase in the volume of either would increase the potential for accidents. Achieving no net new commute trips would limit increased risks to pedestrians/bicyclists from vehicles.

Response to Comment 34-5

Comment Summary: The comment states that the Draft EIR needs to address concerns listed in the Junipero Serra Boulevard Operational and Safety Study Final Report dated December 1999. These concerns include safety for pedestrians and bicyclists, driveway access for residents, illegal U-turns, illegal passing in bike lanes, prohibited truck traffic south of Campus Drive East, maintenance of current capacity and efficiency, and livability.

Illegal maneuvers such as prohibited U-turns, vehicles passing on the right by using bicycle lanes, and prohibited truck traffic south of Campus Drive East, are issues that can best be resolved by enhanced police enforcement. Additional signs might result in fewer illegal behaviors by law-abiding motorists. However, many of the illegal behaviors are knowingly perpetrated by individuals who may only be dissuaded by fear of fines and/or other punitive measures.

Maintenance of capacity and efficiency are also concerns of the County as well as Stanford and other local agencies. Intersections are the primary points of capacity constraints on Junipero Serra Boulevard. For that reason, the Draft EIR has analyzed the impacts of the project on several intersections on Junipero Serra Boulevard and identified mitigation measures to offset any impacts generated by the project at those intersections.

Livability of this arterial roadway is a function of all of these concerns, and any factor that affects those issues ultimately affects the livability of the street either positively or negatively. Additional traffic might increase the strain on the livability of this street. However, the "no net new commute trips" objective of the TDM program as discussed in Mitigation TR-5B on page 4.4-93 of the Draft EIR would tend to maintain or potentially improve the livability of this roadway.

COMMENT LETTER 35, SUSAN M. IVEY AND TED C. HERMAN, 8/1/00

Response to Comment 35-1

Comment Summary: The comment states that we don't need another parking lot.

The project is not intended to create more parking for existing users. Any new parking included in the project is intended to serve new residents and users without altering overall parking behavior by existing users.

COMMENT LETTER 36, DON HIELSON, 8/1/00

Response to Comment 36-1

Comment Summary: The comment opposes use of golf course hole number one for housing, and states that a new 18-hole courses elsewhere may not be feasible.

The Draft EIR does not assume relocation of the entire golf course, but only hole number one. Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 4, Alternative Housing Sites; and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 37, DAN WAGNER, 8/1/00

Response to Comment 37-1

Comment Summary: The comment states that the proposed realignment of the Stanford golf course will be environmentally wasteful because it will require constant auto and golf cart driving simply to get from green to tee.

The new first tee will be close to the clubhouse, thus minimizing the distance that must be traveled. Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

Response to Comment 37-2

Comment Summary: The comment asserts redesign of the golf course first hole will impact San Francisquito Creek just past the second green and that this incursion on land supporting wildlife is unacceptable.

Please refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 4, Alternative Housing Sites.

Response to Comment 37-3

Comment Summary: The comment states that there are lands other than the golf course that are available closer to campus that could well be redeveloped as high-rise parking and/or multi-story residences.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

COMMENT LETTER 38, GARY SHADE, 8/1/00

Response to Comment 38-1

Comment Summary: The comment urges the County to act for total protection of the Stanford foothills in accordance with proposals by the Stanford Open Space Alliance.

Refer to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 39, CHARLES N. TAUBMAN, 8/1/00

Response to Comment 39-1

Comment Summary: The comment opposes the University's proposal to change the designation of golf course lands from Open Space to Academic General [Campus].

Refer to Response to Comment 22-3 and to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 39-2

Comment Summary: The comment states that Stanford is ignoring land closer to campus while eliminating the golf course.

Proposed housing on hole number one would not eliminate the entire golf course. Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 4, Alternative Housing Sites and Master Response 7, Biological Impacts of Golf Course Redesign.

Response to Comment 39-3

Comment Summary: The comment states that there needs to be a greater intensification of its current housing to accommodate more people on less land.

Refer to Master Response 3, Intensified Development Alternative and Master Response 10, Community Plan Description of Density and Intensity of Development. The Community Plan will attempt to balance considerations of building density, compatibility of new development with existing neighborhoods and other land uses, transportation links and traffic concerns, construction cost, and other factors. Densities of up to 15 units per acre are proposed for faculty/staff housing, encompassing a range of housing types from single-family homes to apartments. Construction of much of the proposed student housing will result in greater building heights and density than is typical of existing residential campus development.

The EIR has analyzed the environmental impacts of the number of housing units in the areas proposed by the University. Residential densities in the draft Community Plan are based on gross acreage divided by the proposed number of dwelling units. This does not preclude the University from constructing the same number of dwelling units at a higher net density by building taller structures on a portion of a proposed housing site.

COMMENT LETTER 40, DAVID E. WILKINS, 8/1/00

Response to Comment 40-1

Comment Summary: The comment states that development on the Stanford golf course would detract from the quality of life here and that the golf course is a area-wide recreational resource in an area with two few golf courses.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 8, Historical Significance of Golf Course.

Response to Comment 40-2

Comment Summary: The comment references a report on wild birds that use the Stanford Golf Course.

The golf course will continue to provide habitat for birds. Refer to Master Response 7, Biological Impacts of Golf Course Redesign.

COMMENT LETTER 41, STEVEN ARONSON, 8/1/00

Response to Comment 41-1

Comment Summary: The comment states that there must be an alternative to housing on golf course Hole #1, and that there are environmental reasons to save it.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; Master Response 4, Alternative Housing Sites; Master Response 7, Biological Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course.

Response to Comment 41-2

Comment Summary: The comment states that there are recreational reasons to save the Stanford golf course because over 34,000 rounds of golf are played by students, faculty, and staff, which is almost half of the total rounds played annually.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 42, TOM KEELIN, 8/2/00

Response to Comment 42-1

Comment Summary: The comment states that the County should encourage Stanford to increase the density of it's current and planned housing to accommodate more people on less land.

Refer to Response to Comment 39-3 and Master Response 3, Intensified Development Alternative.

Response to Comment 42-2

Comment Summary: The comment states that it is environmentally wasteful to destroy the first hole and relocate it, forcing people to drive further to get to the first tee.

The realigned first tee will be located in close proximity to the clubhouse. Traffic and pollution impacts would therefore not be expected to be significant.

Response to Comment 42-3

Comment Summary: The comment states that the Stanford golf course is an area-wide recreational resource and that crippling it, starting with the first hole and moving on to other holes later, would destroy the precious resource.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

Response to Comment 42-4

Comment Summary: The comment states that the golf course should not be tampered with to satisfy housing needs that could be satisfied elsewhere because it is the work of a great golf course architect George Thomas and that it has produced great golfers.

Refer to Master Response 3, Intensified Development Alternative, Master Response 4, Alternative Housing Sites, and Master Response 8, Historical Significance of Golf Course.

Response to Comment 42-5

Comment Summary: The comment asserts that San Francisquito Creek as it passes through the golf course is wildlife habitat.

Please refer Master Response 7, Biological Resource Impacts of Golf Course Redesign.

COMMENT LETTER 43, PAUL HARTKE, 8/2/00

Response to Comment 43-1

Comment Summary: The comment states that the mitigation condition of the 1,900 newly constructed student units should specify graduate units as distinct from undergraduate units.

There is no unmet demand for undergraduate units, and no additional undergraduates will be added. Further, this is not a CEQA issue.

Response to Comment 43-2

Comment Summary: The comment states that the above mitigation condition specifies that this number of new units exclude any graduate housing construction initiated prior to the passing of the GUP and should refer to actual new construction, rather than stuffing additional students into existing apartments.

Although Mitigation PH-3 does not require that only dwelling units constructed after the approval of the new GUP be counted toward the University's housing obligation, this can be added as a condition of the GUP if the County desires.

Response to Comment 43-3

Comment Summary: The comment states that the GSC believes that there should be a time line commitment between the construction of graduate student units and the permits and completion of academic developments as stated in the Draft EIR. There should also be a commitment to ensure that these new units will be affordable to graduate students. The construction of 1,900 new units needed for graduate students is based on the current student population with a zero growth and does not factor in the projected increase of 683 graduate students of the next ten years.

Mitigation Measure PH-3 addresses the linkage of housing to academic development and will require the University to construct student housing prior to, or concurrently with, the construction of additional academic space. The comment's specific proposals will be considered by the County during the CP/GUP development process.

COMMENT LETTER 44, KENNETH C. NITZ, MIDPENINSULA REGIONAL OPEN SPACE DISTRICT, 8/2/00

Response to Comment 44-1

Comment Summary: The comment states that the land use consistency analysis included in the Draft EIR (Chapter 3) does not take into account potential open space impacts from golf course relocation.

Refer to Response to Comment 22-3; Master Response 3, Intensified Development Alternative; and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign regarding potential impacts to open space as a result of golf course realignment. The relocation of all seven holes north of JSB to an area south of JSB was evaluated as an alternative on page 7-45 of the Draft EIR, and was found to "reduce the amount of natural open space available on Stanford lands."

Response to Comment 44-2

Comment Summary: The comment states that the land use consistency analysis included in the Draft EIR (Chapter 3) does not take into account potential open space impacts from construction of a proposed new school site.

The plan consistency Chapter of the Draft EIR addresses the consistency of the proposed CP/GUP with existing plans. The CP/GUP does not include a school site. The Draft EIR includes a new school site at Page Mill and Deer Creek Roads as an alternative component (SCHOOL). Page 7-48 of the Draft EIR states that construction of a school at this location would result in the potential loss of open space in the Stanford foothills. For this reason, and other potential impacts to biological resources, this alternative component is not included in the Environmentally Superior Alternative discussion on page 7-57. Also refer to Response to Comment 91-5.

Response to Comment 44-3

Comment Summary: The comment states that the new roadway alternative has not been considered in the findings of consistency with open space policies, in spite of the traffic analysis which suggests that the road would relieve significant traffic impacts.

The plan consistency Chapter of the Draft EIR addresses the consistency of the proposed CP/GUP with existing plans. The CP/GUP does not include a new roadway. The Draft EIR includes a new roadway as an alternative component (TRAN-B). Pages 7-43 and 7-44 of the Draft EIR states that construction of a new roadway and associated increase in access through the foothills would result in a significant and unavoidable loss of open space in the Stanford

foothills. For this reason, and other potential impacts to visual and biological resources, this alternative component is not included in the Environmentally Superior Alternative discussion on page 7-57.

Response to Comment 44-4

Comment Summary: The comment states that the Draft EIR does not address the cumulative impacts of the proposed Carnegie Research Facility on open space in the Lathrop District.

The cumulative open space impact analysis on page 4.2-36 of the Draft EIR includes the Carnegie Foundation project. The Draft EIR concludes that the construction of the Carnegie Foundation, along with the proposed Lathrop development in the GUP, would not result in a substantial loss of public open space lands. However, the Draft EIR also concludes that the change in land use designation proposed by the CP would result in a significant and unavoidable impact. To mitigate this impact, the Draft EIR recommends the adoption of alternative components AGB-A and LU-A, which would result in the protection of open space lands.

Response to Comment 44-5

Comment Summary: The comment disagrees with the Draft EIR's findings that the project is consistent with County General Plan Policy R-LU 68 and Palo Alto General Plan Policy L-1, and utilizes the Draft EIR analysis regarding development proposed for the Lathrop District, on page 4.1-18, to support the point.

The analysis in Chapter 3 is consistent with the actual wording of the specified policies. However, as noted in the comment, the Draft EIR identified physical impacts (i.e., biological and open space) that would result from the proposed CP land use designation in the Lathrop District. As a result, an alternative land use designation (LU-A) was analyzed and is part of the Environmentally Superior Alternative identified in Chapter 7 of the Draft EIR.

Response to Comment 44-6

Comment Summary: The comment disagrees with the Draft EIR's findings that the project would result in less than significant land use impacts for the Lathrop District.

As noted in the comment, the Draft EIR provides an analysis of land use consistency of the CP/GUP proposed development and land use modification in the Lathrop Development District. The analysis focused on the potential conflicts between the building space proposed in the GUP and the land use designation change proposed in the CP. The Draft EIR concludes that the construction of the 20,000 square feet of development proposed in the GUP could occur without significant land use conflicts.

Analysis of the potential land use conflicts that would occur from future development under the CP land use designation of Academic Campus is more speculative. The Draft EIR states that future academic development could result in the need to relocate the golf course and could have the potential to conflict with natural resources protection and open space uses that are afforded in the surrounding area. Based upon the impact criteria applicable to the CP/GUP, no land use

conflicts would occur between the potential Lathrop Development and open space land uses to the west and southwest.

Response to Comment 44-7

Comment Summary: The comment states that the Draft EIR does not address the potential impacts of cumulative growth or project alternatives in the open space analysis, and that mitigation measures in the biological resources section may further reduce the availability of lands for increased public open space and recreational needs.

Refer to Master Response 9, Additional Open Space Protection and Master Response 11, California Tiger Salamander Mitigation Measures.

The Draft EIR recognized that several alternative components (TRAN-B, HOUS-B and SCHOOL) would impact open space resources.

The Draft EIR (page 4.2-22) identifies a potential adverse impact to recreation caused by the demand for recreational facilities due to the projected increased population at Stanford. Implementation of mitigation measure BIO-1 (Option 2), which would require long-term protection of CTS habitat, would not substantially increase the severity of that impact. If Option 2 is chosen, one key habitat area that may benefit from increased protection would be Lake Lagunita and the area immediately surrounding the lake north of JSB. Added protection of this area would not affect trail users in the foothills. CTS habitat south of JSB also may be protected, in particular areas within 500 meters of Lake Lagunita, existing CTS research ponds, and/or any new CTS breeding ponds. The location of the areas to be protected and the quantity of land to be protected cannot be determined until a development proposal regarding the area to be protected and plan for habitat management in that area. Protection of these areas would not be affected.

Response to Comment 44-8

Comment Summary: The comment states that the Draft EIR fails to support findings that there will be no visual impacts to Junipero Serra Boulevard, a County-designated scenic roadway.

The Draft EIR visual analysis concludes that proposed development along the Junipero Serra Boulevard (JSB) corridor will not exceed the evaluation criteria for scenic routes (page 4.2-13). The development proposed for the Lathrop District will be screened by existing development and vegetation. The housing development proposed for the Stable Site (Site O) will be partially screened by intervening vegetation and subject to County design requirements for the development within 100 feet of JSB. Based upon these conditions, this housing development will not result in strong visual contrast, obstruction of middle or foreground views, or any loss or alteration of a specific scenic resource. Through its zoning ordinance, the County has determined that visual effects of development along scenic roads are addressed through design review for any structure within 100 feet of the roadway. Based upon the Stanford Golf Course realignment plans submitted by Stanford, the realignment of the golf course would include the construction of a new pedestrian/golf cart bridge to connect the club house with realigned Hole

• •

÷.,

#1. As shown on Figure 11-4, the new bridge is proposed to span JSB near the green of existing Hole #6. The bridge would be subject to design review.

Response to Comment 44-9

Comment Summary: The comment notes that growth inducing impacts are not included in the Draft EIR summary, and summarizes the conclusions of the Draft EIR regarding growth inducement - that the CP/GUP would result in indirect job growth and related impacts to housing demand and traffic congestion.

Chapter 5 of the Draft EIR discusses the project's growth inducing impacts and acknowledges that this growth could lead to environmental impacts. Due to the speculative nature of these impacts, it is not possible to analyze them in detail. A revised summary table has been included at the front of this document, which includes growth inducing impacts. Growth inducing impacts are identified in Chapter 6 as one of the significant unavoidable environmental effects of the project.

While it is a goal of the CP/GUP to reduce the imbalance of jobs and housing in the area, the Draft EIR concludes that growth inducing impacts would be a significant and unavoidable impact of the project. However, the analysis included in Section 4.3 of the Draft EIR concludes that direct project impacts to the jobs/housing balance would be less than significant if housing is constructed commensurate with new academic development. In order to ensure that housing is constructed, mitigation measure PH-3 has been included in the Draft EIR. Mitigation measure PH-3 requires specific housing goals to be met or permitted prior to the construction of academic development.

Response to Comment 44-10

Comment Summary: The comment states that though the summary notes significant postmitigation impacts on local intersections, the Draft EIR traffic analysis does not evaluate the local and regional traffic impacts of the indirect service and support growth resulting from the increase of employment at Stanford.

As stated in the previous response (44-9), it is not possible to predict the indirect environmental effects that may result from additional growth-induced population increases. It is also not possible to predict with any certainty where these impacts will occur, as they could occur over a wide geographic area.

Response to Comment 44-11

Comment Summary: The comment states that the Draft EIR project description is not detailed enough to evaluate the impacts of the project.

As described on Page 1-3 of the Draft EIR, the CP/GUP EIR is a program-level EIR that is meant to analyze an overall planning and development program rather than a specific building project. Preparation of such an EIR helps streamline environmental review of projects completed under the program but does not eliminate the need for future review of these projects.

At the time that Stanford applies for individual projects, the County will determine the appropriate environmental analysis and documentation for the project.

The CP/GUP EIR analyzes the program proposed by Stanford. This program did not propose development in the areas with the proposed designation of "Open Space and Academic Reserve." Proposals for future development in these areas would be subject to individual environmental review, particularly since the CP/GUP EIR does not analyze the effects of development or land use activity that is not proposed.

Response to Comment 44-12

Comment Summary: The comment states that the County should require Stanford to provide a more detailed Community Plan, and the EIR should be extensively revised and expanded to fully address the Project impacts and mitigation measures.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The Community Plan and General Use Permit are not meant to serve as a specific development plan for proposed future construction on Stanford lands. They are intended to serve as a framework for County decisionmaking regarding future project proposals by Stanford. The County intends to structure the Community Plan and conditions of approval for the General Use Permit to provide for the monitoring and review of individual projects required to mitigate the impacts of future Stanford development. As discussed in the Draft EIR, each specific project will undergo its own environmental review when proposed (Draft EIR, page 1-3).

COMMENT LETTER 45, KEVIN SCHOFIELD, 8/2/00

Response to Comment 45-1

Comment Summary: The comment states that Stanford has not been consistent in their public comments of their proposed changes to the Stanford golf course, and given their inconsistencies related to the golf course, the comment suggests that there may be other surprises in the plan.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign. The Draft EIR has evaluated the impacts of the plan as proposed by Stanford. Stanford's Draft Community Plan was submitted to the County and made available to the public in November 1999. The plan stated Stanford's intent to relocate Hole #1 of the golf course.

Response to Comment 45-2

Comment Summary: The comment states that somewhere in the thousands of acres, better alternatives must exist [than placing housing on Hole #1 of the golf course].

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

.

COMMENT LETTER 46, JOHN BACA, 8/2/00

Response to Comment 46-1

Comment Summary: The comment asks why the East Campus Drainage Study has not been completed as stated in the Stanford University Escondido Village Graduate Student Housing project, and how the CP/GUP analysis can be prepared without the study.

The East Campus Drainage Study, which is being prepared by Stanford, has not yet been completed, and is not available for review. However the analysis prepared for the CP/GUP is adequate without this study because, as noted in Response to Comment 14-11, Stanford will be required to design, construct, and implement facilities and other site features that are sufficient to assure that the project improvements do not cause:

- Any increase in peak downstream storm runoff and
- Any downstream flooding

Any impacts of a specific development project would be assessed, and appropriate site features and facilities required, when the project is approved. Refer to Response to Comment 14-11.

Response to Comment 46-2

Comment Summary: The comment states that there is currently retention of storm waters at Stanford, so why should the Draft EIR analysis be accepted.

Stanford will be required to build stormwater detention and groundwater recharge facilities that do not create extended ponding that could result in mosquito breeding to mitigate impacts associated with development under the CP/GUP.

Response to Comment 46-3

Comment Summary: The comment refers to a previous environmental document prepared for the Stanford University Foothill Reservoir No. 2 project and states that the County should know what the real purposes of a project are before analysis.

The project objectives for the CP/GUP are provided on pages 2-17 and 2-18 of the Draft EIR.

Response to Comment 46-4

Comment Summary: The comment asks why the Carnegie Foundation project required a new access road (Vista) to pave over open space when the existing road is adequate.

This is a question pertaining to the Carnegie Foundation Draft EIR, not the Stanford Community Plan/ General Use Permit Draft EIR.

COMMENT LETTER 47, BILL AND LORNA WARD, 8/2/00

Response to Comment 47-1

Comment Summary: The comment indicates that the Stanford Golf Course is a locally known historic golf course.

Refer to Master Response 4, Alternative Housing Sites; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course.

COMMENT LETTER 48, CHERYLE GAIL, 8/2/00

Response to Comment 48-1

Comment Summary: The comment is opposed to restricting the level of public access within the Dish area.

Refer to Response to Comment 23-1.

COMMENT LETTER 49, MICHAEL MCTEIGUE, 8/2/00

Response to Comment 49-1

Comment Summary: The comment indicates that the Stanford Golf Course is the last work of a famous golf architect.

Please refer to Master Response 8, Historical Significance of the Golf Course.

Response to Comment 49-2

Comment Summary: The comment asserts that the Stanford Golf Course is a natural habitat recognized by the Audubon Society.

Please refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

Response to Comment 49-3

Comment Summary: The comment states that the University offered the public no chance to participate in planning of golf course use prior to submitting the Draft EIR.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign. Stanford's Draft Community Plan was submitted to the County and made available to the public in November 1999. The plan stated Stanford's intent to relocate Hole #1 of the golf course. There have been a number of opportunities for input on the Draft EIR, including the scoping meeting held in Palo Alto on December 15, 1999.

Response to Comment 49-4

Comment Summary: The comment states that the proposed plan will increase traffic and congestion.

Refer to Response to Comment 29-1.

COMMENT LETTER 50, BARBARA DAWSON, 8/2/00

Response to Comment 50-1

Comment Summary: The comment states that the EIR should study the optimum level for Stanford's development and density.

It is beyond the scope of the EIR to determine the optimum level for development at Stanford. The purpose of the EIR is to evaluate the proposed CP and GUP, and to identify mitigation measures and alternatives that can reduce or eliminate impacts to the maximum extent feasible. Maximum development levels for 10-year development periods are established in the General Use Permit, and County staff have proposed further limits on development over the next 25 years as part of the staff recommendation on the Community Plan. Refer to Master Response 10, Community Plan Description of Density and Intensity of Development, for additional information regarding the County's Preliminary Staff Recommendation for the Stanford University Community Plan.

The Draft EIR does recommend that academic development be tied to the provision of housing. Refer to Mitigation Measure PH-3 on page 4.3-18 of the Draft EIR, which establishes a linkage between provision of housing and new academic development. This measure also requires that Stanford continue to identify additional sites for housing both on and off campus. Refer to Master Response 3, Intensified Development Alternative.

COMMENT LETTER 51, DR. AND MRS. GEORGE GIOUMOUSIS, 8/3/00

Response to Comment 51-1

Comment Summary: The comment believes that the Palo Alto Urban Service Area Boundary should used as Stanford's Academic Growth Boundary.

Refer to Master Response 2, Reduced Project Alternative and Master Response 5, Project Conformity with Palo Alto Urban Service Boundary.

Response to Comment 51-2

Comment Summary: The comment states that the land beyond Junipero Serra Blvd. should be kept as open space and permanently dedicated as such, and future buildings should be confined to the core campus.

Refer to Master Response 3, Intensified Development Alternative and Master Response 9, Additional Open Space Protection.

Response to Comment 51-3

Comment Summary: The comment states that an ideal place for student housing would be the eucalyptus area near El Camino Real, near bus and train service.

Refer to Master Response 4, Alternative Housing Sites for a discussion of the potential for housing in the Arboretum.

Response to Comment 51-4

Comment Summary: The comment states that housing should be completed before any more academic expansion is allowed. They should build up in housing and parking structures rather than out. The comment also states that innovative transportation alternatives should be explored to ensure that no new car trips result from the plan.

Refer to Responses to Comments 39-3 and 43-3 and Master Response 3, Intensified Development Alternative. The Draft EIR establishes a traffic mitigation goal of "no net new commute trips" as discussed in mitigation measure TR-5B.

Response to Comment 51-5

Comment Summary: The comment states that the proposed amount of new construction is too much and that more open space is needed for recreation and preservation of a beautiful area.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; and Master Response 9, Additional Open Space Protection.

Page 4.2-21 of the Draft EIR analyzes impacts to recreational uses at Stanford. Refer to Response to Comment 23-1.

Response to Comment 51-6

Comment Summary: The comment requests that California tiger salamander mitigation be completed and proven successful, before any building is allowed.

The Draft EIR includes a mitigation option that requires successful salamander breeding in experimental ponds for at least three consecutive seasons before development of occupied CTS habitat within 500 meters of Lake Lagunita. See Mitigation Measures BIO-1(a) through (e) – Option 2, starting on page 4.8-32 of the Draft EIR. Also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

COMMENT LETTER 52, PENINSULA CONSERVATION CENTER FOUNDATION, 8/3/00

Response to Comment 52-1

Comment Summary: The comment states that their primary concern is permanent protection of existing open space in the foothills, with no new development in the Lathrop District or modifications to the golf course northeast of Junipero Serra Blvd.

Refer to Master Response 9 regarding open space protection and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course, regarding the relocation of Hole #1 of the Stanford golf course.

Response to Comment 52-2

Comment Summary: The comment supports a modification of Academic Growth Boundary Alternative B that would bring it into conformance with the City of Palo Alto's Urban Service Boundary.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 52-3

Comment Summary: The comment supports adoption of the Open Space and Field Research land use designation for areas outside the Academic Growth Boundary and also requests permanent protection of the foothills based upon the expansion of the magnitude proposed by the GUP.

This alternative component has been identified as part of the Environmentally Superior Alternative. Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 9, Additional Open Space Protection.

Response to Comment 52-4

Comment Summary: The comment states that the proposed new construction of housing should accommodate the projected increase in faculty/staff and postgraduate population but it will not address the existing lack of housing. The new development will also make the low-to-moderate housing crisis worse.

As discussed in Chapter 4.3 of the EIR (Table 4.3-13), the additional student housing proposed by the University will address the projected increase in graduate students and provide housing for a substantial number of existing graduate students who cannot presently live on campus. The discussion of cumulative impacts (PH-C3) states that the implementation of the draft Community Plan will increase the net supply of housing, particularly for low- to moderate-income households. The number of dwelling units proposed by the University will not address current unmet housing needs, except among existing graduate students who desire to live in University housing. Growth-induced housing demand from employment that is indirectly stimulated by development under the Plan could increase.

Response to Comment 52-5

Comment Summary: The comment states that all future development on the Peninsula must be carefully planned to add no new commuter trips based on actual counts.

The Draft EIR establishes a traffic mitigation goal of "no net new commute trips" as discussed in mitigation measure TR-5B.

Response to Comment 52-6

Comment Summary: The comment asserts that California tiger salamander mitigation's success for the Lathrop Development District is unproven; mitigation ponds have failed to produce salamanders in both of the past two years; reliance on current mitigation and salvage of CTS does not reduce impacts to a less-than-significant level.

The Draft EIR agrees that mitigation as proposed by Stanford would not reduce impacts to less than significant. The Draft EIR therefore includes a mitigation measure that requires successful salamander breeding in artificial ponds for at least three consecutive non-dry year seasons before development on occupied CTS habitat within 500 meters of Lake Lagunita. See Mitigation Measures BIO-1(a) through (e) – Option 2, starting on page 4.8-32 of the Draft EIR. Also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 52-7

Comment Summary: The comment requests that California tiger salamander mitigation performance standards be written and met by Stanford in view of the University's inability to predict mitigation success for California tiger salamander.

Please refer to Master Response 9, Additional Open Space Protection and Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 52-8

Comment Summary: The comment requests that Stanford demonstrates mitigation success for special status plant species before development is allowed to proceed.

It has not been determined if special status plant populations exist in the respective development envelopes. According to the Center for Conservation Biology at Stanford, there are areas of biodiverse, native plant communities in the GUP area (e.g. Lake Lagunita), but none are slated for grading and development.

Mitigation BIO-1(i), which specifies mitigation for rare, threatened and endangered plants, specifies that "Where complete avoidance cannot be achieved, Stanford shall submit a site-specific mitigation and compensation program for the affected resources in consultation with the California Department of Fish and Game and/or the U.S. Fish and Wildlife Service." These agencies will provide input on requirements for demonstrating mitigation success. Refer to Response to Comment 101-7 for additional information on mitigation measures to protect plant species.

Response to Comment 52-9

Comment Summary: The comment states that the new road would be growth-inducing, which is another reason to set the Academic Growth Boundary at the Palo Alto Urban Service Boundary.

The Draft EIR identifies the roadway alternative (TRAN-B) as potentially growth-inducing (see page 7-44), and does not recommend that roadway as part of the Environmentally Superior Alternative. Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 52-10

Comment Summary: The comment states that in efforts to help the jobs housing balance, inclusion of performance standards for new construction of new academic building should be conditional upon completion of new housing. Effective mitigation for low-to-moderate housing supply should also be included.

Chapter 4.3 (Impact Analysis PH-3) contains a mitigation proposal to link the construction of academic space to the production of housing. As a policy approach, the County could impose an inclusionary requirement as a condition of permit approval stating the specified percentage of housing constructed by the University be affordable to low- and moderate-income students, faculty, and staff. Mitigation Measure GH-1 on page 5-7 of the Draft EIR also specifies that "The University shall work with the City of Palo Alto, City of Menlo Park, and Santa Clara County to identify additional sites on- and off-campus that would be suitable for housing development to meet the needs of additional workers who will be attracted to the area as a result of the project." However, given the potential difficulty in developing housing, the growth-inducing impact of the project is considered to be significant and unavoidable.

Response to Comment 52-11

Comment Summary: The comment asks if there is sufficient Stanford land available to mitigate all potential runoff impacts through construction and operation of storm runoff detention facilities.

Based on a review of the improvements shown in the GUP application, it is estimated that approximately 22,300 cubic feet of storm runoff detention basin capacity will be required to prevent any increase in peak 100-year runoff resulting from construction of additional impervious areas within the project area (see Table 4.5-2 on page 4.5-10 in the Draft EIR). The subareas where additional detention capacity will be required are as follows: Subarea S-1 (8,300 cubic feet), Subarea S-2 (8,000 cubic feet), Subarea M-4 (1,600 cubic feet), and Subarea M-7 (4,400 cubic feet). The detention basin facilities can be constructed above ground (e.g. ponds) where undeveloped land is available or below ground (e.g. in over-sized pipes located beneath parking or landscaped areas) in developed areas.

Based on the analysis, there is sufficient space available within each of the noted subareas to construct the required detention facilities. Within Subarea M-4, which is over 90 percent developed, the required detention basin capacity could be provided utilizing about 230 feet of 3-foot diameter below ground storm drain pipe. In Subareas S-1, S-2, and M-7, the required

detention basin capacity could be provided by constructing above ground detention basins within currently undeveloped areas (i.e. over 200 acres is available in each subarea as shown in Table 4.5-1 on page 4.5-7). If all required storm runoff detention basin volume were contained in detention basins accommodating water to a depth of one foot, slightly over half an acre of total area would be occupied by basins. While additional storm events will be considered at the time of facility design, this analysis indicates that on-site mitigation of large storm events is fully feasible.

Response to Comment 52-12

Comment Summary: The comment expresses serious concerns about the significant, unavoidable impacts of the proposed developments upon traffic and urges inclusion of "no net new commute trips" standard based on actual counts. The comment also urges inclusion in the final EIR of a traffic-reducing strategy based on reduced new parking spaces, including an option limiting new spaces to the minimum required for new housing, and no provision for new parking to support single-occupant car commuters.

As indicated in the Response to Comment 52-5 mitigation measure TR-5B on page 4.4-93 of the Draft EIR includes an objective of "no net new commute trips" to be monitored and verified using actual traffic counts. Parking demand management is one of the tools that Stanford may use in meeting that objective. This is expected to include retaining the current parking ratio of 1.03 spaces per student, faculty and staff if so required by the County. Stanford would allocate any parking spaces in the manner best suited to reduce single occupant vehicle commute trips and encourage use of alternate modes of transportation, such as the Marguerite shuttle, car-pools, van-pools, walking, and biking.

COMMENT LETTER 53, DAVID B. MONTGOMERY AND TOBY F. MONTGOMERY, 8/3/00

Response to Comment 53-1

Comment Summary: The comment states that the traffic mitigation measures proposed by the County generally involve widening roads, adding additional turn lanes on existing roads, which would cause serious problems for the campus residential community.

The first level of mitigation proposed by the Draft EIR is to not increase peak hour commute traffic above today's levels. This will result in conditions no worse than today as a result of development from the Community Plan. The most significant mitigation measure for the project would be trip reduction and monitoring as described in mitigation measure TR-5B on page 4.4-93 of the Draft EIR. The success of this mitigation measure would prevent the need for any of the Tier 2 capacity expansions listed in mitigation measure TR-5D on page 4.4-97 of the Draft EIR. In addition, the Draft EIR allows for Stanford to mitigate impacts to Tier 2 intersections through contribution of funding equivalent to Stanford's proportional share of intersection modifications for use as funding for alternative mitigation measures that would benefit the intersections. Mitigation measure TR-6 on page 4.4-106 specifically deals with residential streets. Measure TR-6A specifically requires Stanford to participate in any neighborhood traffic studies that are initiated by Palo Alto or Menlo Park. Mitigation measure TR-6B specifies that

site-specific traffic studies be prepared for major GUP developments as they are proposed. The specific development proposals will include location of housing and academic development and exactly how that development will access the adjacent roadway network.

Response to Comment 53-2

Comment Summary: The comment states that the proposal to add an additional left turn lane on Stanford Avenue at the Junipero Serra Boulevard intersection and to add an additional traffic lane on Junipero Serra Boulevard from Stanford Avenue to Page Mill Road, would impact the Stanford Avenue/Junipero Serra Boulevard residential neighborhood.

As indicated by the comment and in the description of these capacity enhancements on page 4.4-103 of the Draft EIR, these roadway improvements might cause added traffic on Stanford Avenue, which would be undesirable from a neighborhood perspective. For that reason, this improvement has been identified as a Tier 2 improvement and would only be implemented if Stanford fails to meet the "no net new commute trips" standard as described in mitigation measure TR-5B on page 4.4-93 of the Draft EIR. The County could choose to use funds contributed by Stanford for other forms of mitigation as well. Refer also to Response to Comments 53-1 and 54-2.

Response to Comment 53-3

Comment Summary: The comment requests that the County insure that all traffic and circulation mitigation measures be undertaken in a manner that will respect and protect existing residential campus neighborhoods.

As indicated in the Responses to Comments 53-1 and 53-2, mitigation measure TR-5B on page 4.4-93 of the Draft EIR sets a target of "no net new commute trips". This mitigation measure is designed to eliminate the need for capacity enhancing mitigation measures and minimize the potential impacts on residential neighborhoods by maintaining or reducing the existing number of commute trips. If other mitigation measures are determined to be necessary, the full impacts of the modifications will be considered before they are finalized.

Response to Comment 53-4

Comment Summary: The comment requests that the County thoroughly analyze and take account of neighborhood consequences of all proposed traffic "mitigation" projects to be considered in conjunction with the GUP and EIR.

As indicated in the Responses to Comments 53-1, 53-2, and 53-3 mitigation measure TR-5B on page 4.4-93 of the Draft EIR sets a target of "no net new commute trips". This mitigation measure is designed to eliminate the need for Tier 2 capacity enhancing mitigation measures listed in mitigation measure TR-5D. This would minimize or prevent the potential impacts on residential neighborhoods by maintaining or reducing the existing number of commute trips. If Tier 2 capacity enhancing improvements were to become necessary they would be designed to minimize the potential consequences for neighborhoods.

Response to Comment 53-5

Comment Summary: The comment requests that a new noise study should be conducted at the Stanford Avenue/Junipero Serra Boulevard Residential area, updating a 1988 study conducted for the 1989 GUP.

Ambient noise measurements were taken at several locations around the campus, and are reported in Table 4.12-1 on page 4.12-5 of the Draft EIR. Receptors 2 and 3 represent typical residential areas along Stanford Avenue and Junipero Serra Boulevard, respectively. These data provide a reasonable reference point for establishing baseline conditions.

The existing and future noise levels of these receptors are discussed in the Draft EIR. The predicted baseline noise levels in the previous study by Vincent Salmon, P.E. deviate from the recent monitoring results conducted in November 1999. The noise monitoring results in the previous 1989 GUP EIR are not representative of realistic noise levels experienced by residents. For example, one noise measurement was conducted only four (4) feet from the nearest travel lane of Stanford Avenue. Considering the majority of houses are 50 to 75 feet away from the nearest lane of Stanford Avenue, the previous noise measurements overestimated traffic noise levels. Noise monitoring at Receptor 3 for the Draft EIR was conducted at the middle of a residential front yard, approximately 35 feet away from the edge of the sidewalk. The recent measurements are a better representation of the baseline noise environment, which is more suitable for describing the existing noise conditions. Refer also to Response to Comments 14-17 and 54-2.

COMMENT LETTER 54, JEANNIE SIEGMAN, 8/3/00

Response to Comment 54-1

Comment Summary: The comment states that Tier 2 measures are all defined in terms of intersection enlargement and lengthening of turn lanes, which have secondary effects on bicyclists and pedestrians, and the traffic-inducing effects of the enlarged road affect the surrounding circulation system.

Efforts would be made in the design of Tier 2 improvements to avoid or mitigate secondary effects on bicyclists and pedestrians. If desired by the County or the agency with jurisdiction over a given mitigation measure, the design of any capacity improvement may be adjusted to limit the capacity increase to no more than what is required to offset Stanford's impact or an alternative mitigation measure that benefits the impacted intersection may be selected. This may be used as a means of avoiding or offsetting potential traffic-inducing effects of capacity improvements.

Response to Comment 54-2

Comment Summary: The comment requests that the Final EIR be less prescriptive about how capacity increases are accomplished and suggests building more flexibility into the mitigation measures so that they can be designed using future state of the art techniques that may become available at the time that the mitigation measures are triggered and designed.

***** .

•

As indicated in the discussion of mitigation measure TR-5D on page 4.4-98, the jurisdiction receiving Stanford's funds may choose to use those funds for the designated intersection modifications or for trip reduction measures that benefit the intersection in question. To provide for greater flexibility, the text will be changed.

The Draft EIR is revised as follows:

Page 4.4-98. The second sentence in the first full paragraph is revised to read:

The jurisdiction may choose to use funds that Stanford contributes for the intersection modifications, or for trip reduction measures that benefit the intersection in question, or for alternate mitigation measures that may be designed at the time that the mitigation measures are triggered.

COMMENT LETTER 55, THOMAS S. JORDAN, JR., 8/3/00

Response to Comment 55-1

Comment Summary: The comment states that there are no standards stated in the Draft EIR against which the county can measure square footage, more daytime population and more parking.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 10, Community Plan Description of Density and Intensity of Development. The standards used for evaluation of the development proposed in the CP/GUP are provided in the "Evaluation Criteria with Points of Significance" Section for each issue area included in Chapter 4 of the Draft EIR.

Response to Comment 55-2

Comment Summary: The comment requests that the Draft EIR study an Academic Growth Boundary which coincides with the County's current line between Campus and Academic Reserve/Open Space.

As stated in the comment, the Draft EIR analyzes the AGB location proposed by Stanford and two alternative locations. Both alternative locations meet the criteria in Section 15126.6 of the CEQA Guidelines, which indicate that alternatives are meant to "...attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." The alternative AGB locations attain the basic objectives of the project and avoid the significant impacts of the project on open space. Maintaining the current division between the Campus and Academic Reserve and Open Space designations is a portion of both No Project alternatives.

The Draft EIR analyzes the potential development that would result from the proposed CP and GUP, including the proposed land use designations and academic growth boundary. The specific effects of including lands which are currently designated Academic Reserve and Open Space inside the proposed AGB are addressed in the discussion of impacts resulting from development

of housing on the Stable Site and from proposed changes in the land use designation of the Lathrop district and golf course, as well as in the discussion of visual impacts of housing along El Camino Real (refer to Draft EIR page 4.2-23)

For more discussion of the relationship of the AGB with the Palo Alto Urban Service Area, refer to Master Response 5. With regard to the consequences of the AGB and mechanisms for its enforcement, refer to Master Response 9, Additional Open Space Protection and Master Response 10, Community Plan Description of Density and Intensity of Development.

Response to Comment 55-3

Comment Summary: The comment states that the Community Plan does not contain adequate definition of land use designations

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Definitions of allowable uses within each land use designation are included in the Stanfordproposed Community Plan and addressed in greater detail in the preliminary staff recommendation on the Community Plan dated August 2000.

Response to Comment 55-4

Comment Summary: The comment states that the analysis of the Reduced Project is inadequate.

Refer to Master Response 2, Reduced Project Alternative and Master Response 3, Intensified Development Alternative.

Response to Comment 55-5

Comment Summary: The Draft EIR can and should provide public information on actual impact regardless of state law requirement of finding of full mitigation. The Draft EIR should state the dollar difference to PAUSD of 570+ children attending PAUSD from Stanford compared to 570+ children attending PAUSD from homes in the City of Palo Alto.

Stanford's tax exempt status is not in the control of the County. Further, state law provides that the statutory school impacts fees "are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property . . . on the provision of adequate school facilities." (Government Code Section 65995(h); see also Section 65996(b)). In light of this statutory directive, the County does not have the authority to find the project's school facilities impacts to be significant and unmitigated.

Response to Comment 55-6

Comment Summary: The comment asks what is the authority for the Draft EIR statement that the County cannot require Stanford to generate "no net new commute trips".

Health and Safety Code, Section 40717.9 prohibits public agencies from requiring an employee trip reduction program "unless the program is expressly required by federal law and the elimination of the program will result in the imposition of federal sanctions, including, but not limited to, the loss of federal funds for transportation purposes." This provision was enacted after the 1989 GUP.

However, as indicated in the discussion of mitigation measure TR-5B on page 4.4-93 of the Draft EIR, Stanford has the option and incentives to pursue a TDM program designed to encourage and support behaviors by individuals resulting in "no net new commute trips".

Response to Comment 55-7

Comment Summary: The comment states that the EIR should certify that data obtained from Stanford was verified.

The CP/GUP EIR was completed in accordance with all County policies for preparation of environmental documents. In signing a contract to complete this project, the EIR consultants acknowledged and agreed to these County policies. Analyzing any project of any size requires that some information be received from the applicant, as information was received from Stanford for the preparation of the CP/GUP EIR. All data received from Stanford and other sources were reviewed and incorporated into the Draft EIR following verification that the data was appropriately collected and documented.

COMMENT LETTER 56, REX S. JACKSON, SHIRLEY MERILL, DAVID OBERSHAW, AND LYNN AND OLIVIER PIERON, 8/3/00

Response to Comment 56-1

Comment Summary: The comment opposes housing on golf course Hole #1 and requests that other alternative housing sites be evaluated.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 4, Alternative Housing Sites, Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, and Master Response 8, Historical Significance of Golf Course.

COMMENT LETTER 57, GERRY PLUNKETT, 8/3/00

Response to Comment 57-1

Comment Summary: The comment asserts that the naturalized roughs of the golf course constitute important wildlife habitat.

Please refer Master Response 7, Biological Resource Impacts of Golf Course Redesign.

Response to Comment 57-2

Comment Summary: The comment opposes loss of golf course Hole #1 because of all of the charitable events that are held at the golf course and refers to the golf course's historic value.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; and Master Response 8, Historical Significance of Golf Course.

COMMENT LETTER 58, HERB BOROCK, 8/3/00

Response to Comment 58-1

Comment Summary: The comment states that Stanford University should be required to initiate a rezoning of the DC Powers site from PC (Planned Community) to OS (Open Space), if Palo Alto has not already done so.

The DC Powers site is located outside of the Santa Clara County Community Plan boundary. Impacts associated with the proposed mitigation measure included in the comment have been mitigated within the project area, or by adoption of alternatives. Therefore, the Draft EIR does not rely on lands located outside of the Community Plan boundary for mitigation. Also refer to Master Response 9, Additional Open Space Protection and Response to Comment 32-7.

Response to Comment 58-2

Comment Summary: The comment states that approximately 1,175 acres of Stanford lands located in the foothills should be pre-zoned by Palo Alto to Open Space or protected by the County as part of the CP/GUP approval in order to keep Stanford from selling the land for additional development.

Whether or not the land can be sold is not a determining factor of when it should be annexed to Palo Alto. Land use determines whether land should be annexed to the City of Palo Alto under the 1985 Land Use Policy Agreement. The CP restrictions for the land would apply no matter who owns the land. Land use regulations are associated with the land, not with the owner.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 58-3

Comment Summary: The comment states that Stanford University should be required to take the following action as mitigation for any County approval of its application: Permanently protect Lots 1, 2, and 3 on the western side of Coyote Hill as Open Space.

Refer to Response to Comment 58-1.

Scenic easements on these sites are mitigation for development in the Stanford Research Park. The lots located on the western side of Coyote Hill are located outside of the Santa Clara County Community Plan boundary. Therefore, the use of these sites is not analyzed in the Draft EIR.

Response to Comment 58-4

Comment Summary: The comment states that the EIR should analyze the effects of relocating the golf course to each of the four alternative locations identified in prior Stanford planning documents.

The Draft EIR addresses the use of Hole #1 for faculty and staff housing (Site O). Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, Master Response 7, Biological Resource Impacts of Golf Course Redesign, and Master Response 8, Historical Significance of the Golf Course further address open space, recreation, historic and biological issues associated with the loss of Hole #1 and the resulting need for realignment of holes one through seven. There is no proposal included in the CP/GUP for relocation of the entire golf course. As such, the EIR does not analyze alternative sites for the entire golf course.

The Draft EIR does evaluate an alternative component that would relocate holes one through seven to south of JSB to allow for additional housing construction. This alternative component was not determined to be environmentally superior to leaving holes 2 through 7 north of Junipero Serra Boulevard.

Response to Comment 58-5

Comment Summary: The comment states that Stanford should be required to eliminate from the project the anticipated realignment of Campus Drive East.

The realignment of Campus Drive East to form a "normal" 90 degree intersection is required to improve the safety and operation of the existing angle intersection. As indicated in the Response to Comment 32-2, a 90 degree intersection has shorter cross walks resulting in improved safety for bikes and pedestrians. A 90 degree intersection also provides better sight lines for drivers and reduces turning speeds, again resulting in improved safety for all users of the intersection. No extension of the roadway from Campus Drive East or development in the foothills is proposed due to the realignment. There appears to be no valid reason to prohibit the realignment.

Response to Comment 58-6

Comment Summary: The comment states that Stanford University should be required to take the following action as mitigation for any County approval of its application: Permanently protect from development the landscape buffer created by the anticipated realignment of Serra Street.

Realignment of Serra Street is described in the GUP application as an anticipated project. If the project is proposed, it will be reviewed to determine if it will result in site specific impacts not evaluated in this EIR.

COMMENT LETTER 59, J. PAUL LOMIO, 8/3/00

Response to Comment 59-1

Comment Summary: The comment states that Stanford is proposing 1,000 units of housing in the East Campus area and requests a comprehensive traffic study of the College Terrace neighborhood, followed by the implementation of traffic calming measures to mitigate the impact of Stanford's development.

As indicated previously in the Responses to Comments 14-5 and 14-7, the Draft EIR already contains provisions for Stanford's participation in neighborhood traffic studies and mitigation measures. As indicated in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the city to determine the proportion of cut-through traffic associated with Stanford. Stanford's participation will be coordinated through the County Planning Office. Stanford will then be responsible for its fair share of mitigation measures that the County determines are reasonable.

COMMENT LETTER 60, MARY C. DAVEY, 8/3/00

Response to Comment 60-1

Comment Summary: The comment requests that the County adhere to the Palo Alto Urban Service Boundary along Junipero Serra.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 60-2

Comment Summary: The comment requests no development on the golf course.

Refer to Master Response 4, Alternative Housing Sites.

Response to Comment 60-3

Comment Summary: The comment states: All the foothill lands northwest of Junipero Serra should be protected as permanent open space and field research.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 60-4

Comment Summary: The comment states that the new housing developments should be designed with the village concept in mind, tied to no net new commute trips and affordable to all pocketbooks with an emphasis on low income.

Mitigation Measure PH-3 addresses the linkage of housing to academic development and will require the University to construct student housing prior to, or concurrently with, the construction of additional academic space. Refer to response to comment 52-10. Also refer to

Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

Response to Comment 60-5

Comment Summary: The comment states that the traffic from the proposed 2+ million square feet of new facilities cannot be mitigated.

By creating a more self contained academic community, Stanford would reduce the effects of its traffic on the surrounding region by reducing overall vehicle miles traveled and vehicle hours traveled. As indicated in the Response to Comment 52-5, one objective of building housing for Stanford students, faculty, and staff on the campus is to allow those Stanford users to live on campus and not need to commute from existing off-campus locations. A primary mitigation for the traffic impact is the "no net new commute trips" goal set out in mitigation measure TR-5B on page 4.4-93 of the Draft EIR. The Draft EIR (page 4.4-104) finds a significant and unavoidable traffic impact because ensuring traffic impact mitigation implementation is largely outside the direct control of the County, not because it would not be possible to mitigate traffic impacts.

Response to Comment 60-6

Comment Summary: The comment requests a reduction in the proposed project, and states that even half of the proposal would involve too much development.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 2, Reduced Project Alternative.

COMMENT LETTER 61, LYMAN P. VAN SLYKE, 8/3/00

Response to Comment 61-1

Comment Summary: The comment states that relocation of Hole #1 of the golf course will have impact to endangered species and riparian habitat.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 7, Biological Impacts of Golf Course Redesign.

Response to Comment 61-2

Comment Summary: The comment states that there are no plans for reconfiguring the golf course and removal of the first hole will require redesign of the first seven holes.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 7, Biological Impacts of Golf Course Redesign.

Response to Comment 61-3

Comment Summary: The comment requests evaluation of alternative housing sites to Hole #1.

Refer to Master Response 4, Alternative Housing Sites.

COMMENT LETTER 62, SALLY-ANN RUDD, DOWNTOWN NORTH NEIGHBORHOOD ASSOCIATION, 8/3/00

Response to Comment 62-1

Comment Summary: The comment states that there is a marked increase in cut-through traffic in the Downtown North neighborhood, a phenomenon borne out by a traffic study recently completed by the City of Palo Alto Traffic Division. This study concluded that up to 70 percent of trips on neighborhood streets during commute hours were from cars cutting through the Downtown North neighborhood, using it as a shortcut between Middlefield Road and Alma Street.

As indicated in the Response to Comment 14-1, the Draft EIR already contains provisions for Stanford's participation in neighborhood traffic studies and mitigation measures. As indicated in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the city to determine the proportion of cut-through traffic associated with Stanford. Stanford's participation will be coordinated through the County Planning Office. Stanford will then be responsible for its fair share of reasonable mitigation measures that may come out of these studies. The fair share percentage of the improvement cost at any location is defined as being the proportion of traffic at that location which is generated by the Stanford campus. It should be noted, based on this comment, that the 1999 study of cut through traffic apparently does not indicate what proportion of non-local traffic is associated with Stanford. It is not uncommon for neighborhoods to experience high rates of non-local traffic generators.

Response to Comment 62-2

Comment Summary: The comment states that as a result of cut-through traffic one of the Downtown North neighborhood residential streets is described as having "the second-highest volume of traffic of any neighborhood street in Palo Alto". Cut-through traffic involves physical danger to residents (and their children and pets) by virtue of the speed of these cars, as well as the annoyances caused by air pollution, noise, etc.

Refer to response to comment 62-1.

Response to Comment 62-3

Comment Summary: The comment states that although it is outside the scope of the Downtown North traffic study, the reason people are cutting through the Downtown North neighborhood is because people who use Highway 101 are seeking out the best way to get to Stanford University and their jobs in the Stanford Research Park.

As indicated in the Responses to Comments 14-5, 14-7, 14-8, and 62-1, mitigation TR-6A on page 4.4-106 of the Draft EIR provides for Stanford's participation in neighborhood traffic

studies and mitigation measures. The construction of more housing on Stanford lands would allow existing Stanford users to move from their current off-campus locations to on-campus housing, reducing the need for commute trips that may contribute to cut-through traffic. Additionally, the trip reduction and monitoring measures described in mitigation TR-5B on page 4.4-93 of the Draft EIR should increase the use of alternate modes of transportation and reduce the use of single occupant automobiles, helping to minimize the potential for cut-through traffic.

Response to Comment 62-4

Comment Summary: The comment states that there is no discussion in the EIR of the specific effects on Palo Alto's residential neighborhoods (specifically Downtown North) as a result of Stanford's development plans. There is no consideration of how people who use 101 will reach the Stanford campus area to get to their jobs.

Section 4.4.E.4 on page 4.4-60 of the Draft EIR describes the distribution of project trips to Stanford. The origins (homes) of Stanford users were identified using a database of existing Stanford students, faculty, and staff. Their destinations (on-campus facilities) were determined based on the trip generation for each facility. A variety of specific paths were established between each possible origin and destination area. Project generated trips were assigned to these paths using the TRAFFIX analysis software as described on page 4.4-63 of the Draft EIR. These trips are all assumed to be single vehicle trips. However, it is the objective of the project as described in mitigation TR-5B on page 4.4-93 of the Draft EIR to generate "no net new commute trips". The TDM measures would be used to switch enough people to using various forms of public transit, carpools, walking and bicycles that there would be no additional commute trips without an equal or greater reduction in existing commute trips.

It should also be noted that, as indicated in the Responses to Comments 14-1, 62-1, and 62-3, mitigation TR-6A on page 4.4-106 of the Draft EIR provides for Stanford's participation in and contribution of fair share funding for neighborhood traffic studies and mitigation measures. These could be used to address the effects of Stanford's cut through traffic on neighborhoods. Some measures identified for cooperative trip reduction described on page 4.4-97, such as a park-and-ride lot near the Dumbarton Bridge, could also serve to reduce neighborhood traffic.

COMMENT LETTER 63, HENRY LAWRENCE, 8/3/00

Response to Comment 63-1

Comment Summary: The comment states that all the peninsula communities with significant business traffic have built roads connecting their business centers to Interstate 280 save one – Stanford. Los Altos has Magdalena and El Monte Roads; Palo Alto has Page Mill Road; and Menlo Park has Sand Hill and Alpine Roads. -The Santa Clara County Board of Supervisors should not approve any construction on Stanford owned property until the Stanford Land Management Company submits a plan to build a four lane divided road connecting the University's core with Interstate 280.

The Draft EIR studies an alternative that would require construction of a road linking Stanford to I-280, and concluded that such a road would increase the severity of the project's environmental

effects. It is further noted that the interchanges of Page Mill, Alpine, and Sand Hill with I-280 were constructed to serve Stanford as well as Palo Alto and Menlo Park when the freeway was constructed.

Response to Comment 63-2

Comment Summary: The comment asserts that proposed connector between Campus Drive West and Alpine Road will impact Los Trancos Creek and endangered species.

The Draft EIR agrees that this alternative roadway component would have significant biological impacts. The Draft EIR analysis of the roadway highlights these impacts in Table 7-3 in the analysis of Alternative Component TRAN-B.

Response to Comment 63-3

Comment Summary: The comment proposes a road for Stanford traffic only, with a large median strip capable of providing space for future lanes, and should not connect with Junipero Serra Boulevard. This road is proposed to connect to I-280 between Alpine and Page Mill Roads and should be complete by 2010 with its own interchange with I-280 to prevent the Alpine Road interchange from becoming a bottleneck.

The most feasible alignment for a new roadway would be that which has already been considered in section 4.4.F (page 4.4-84) and Chapter 7 (page 7-43) of the Draft EIR. This Roadway would connect Campus Drive West with Alpine Road and disrupt the shortest distance of open space and the fewest streams, even though it would cross Los Trancos Creek. In particular this alignment would avoid impacting the largest special conservation area on Stanford lands, which is west of Junipero Serra Boulevard and south of Lake Lagunita. Special conservation areas are subject to slope sensitivity zones, seismically hazardous zones, riparian setbacks, and special status species habitat. Any new road must connect with the existing circulation system. Junipero Serra Boulevard is part of this system and should be connected to any new roadway to maximize the effectiveness of that roadway. Any roadway that connects directly to the Interstate Highway system by means of an interchange must serve the public and cannot be restricted to Stanford traffic only, and cannot be built without Caltrans approval, which is by no means certain.

Response to Comment 63-4

Comment Summary: The comment states that the Santa Clara County Board of Supervisors should link future Stanford growth plans to milestone completions of the Stanford Connector Highway.

The Santa Clara County Board of Supervisors may set construction of necessary and feasible mitigation measures as conditions of approval for this and future projects. However, construction of a Stanford Connector Highway is not a feasible mitigation measure and would increase the project's environmental impacts.

51

Response to Comment 63-5

Comment Summary: The comment states that Stanford needs to be held accountable for infrastructure concerns.

As discussed on pages 4.10-6 through 4.10-7 of the Draft EIR, Stanford provides its own electric power, which is generated at the Cardinal Cogen facility and distributed from the Palou substation. Upgrades to the substation are in progress. Demands on water and wastewater services are evaluated on pages 4.10-11 through 4.10-14 of the Draft EIR. Impacts to existing infrastructure are evaluated there. Effects on air quality (including changes in air temperature) are discussed in Section 4.11 of the Draft EIR. Generation and handling of hazardous waste is discussed in Section 4.7 of the Draft EIR. No evidence that Stanford is generating sources of electromagnetic interference has been supplied.

Response to Comment 63-6

Comment Summary: The comment states that serious consideration should be given to constructing a tunnel connecting I-280 to the Stanford core so that the hills west of Junipero Serra Boulevard can remain undisturbed.

There are a variety of obstacles to such a project. A significant technical and safety concern would be that such a tunnel would pass through either the Stanford Fault or the San Juan Hill Fault. The tunnel suggested by this comment would span a distance of more than a mile. The Caldecott Tunnel on Highway 24 between Oakland and Orinda is the closest existing tunnel of similar length. It consists of three two-lane bores and is part of a major regional freeway system that is in great need of additional capacity, with very little likelihood of a fourth bore being built in the foreseeable future. The suggested four lane Stanford Connector Highway tunnel would require either a substantially larger bore to carry four lanes of traffic or two bores of similar diameter to the Caldecott. In either case this would discount the possibility for future capacity expansion previously suggested in Comment 63-3. The suggested tunnel is not a practical or feasible solution to traffic impacts.

COMMENT LETTER 64, JOHN R. BARKDSALE, 8/3/00

Response to Comment 64-1

Comment Summary: The comment states that the Stanford golf course should not be used for Stanford's sprawl because of the much-needed recreational open space that it provides. Stanford should be able to expand without using the golf course or open space lands.

Refer to Master Response 3, Intensified Development Alternative and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 9, Additional Open Space Protection.
COMMENT LETTER 65, JEANNIE SIEGMAN, 8/3/00

Response to Comment 65-1

Comment Summary: The comment states that Tier 2 measures are all defined in terms of intersection enlargement and lengthening of turn lanes, which have secondary effects on bicyclists and pedestrians, and the traffic-inducing effects of the enlarged road affect the surrounding circulation system.

Refer to Response to Comment 54-1.

Response to Comment 65-2

Comment Summary: The comment requests that the Final EIR be less prescriptive about how capacity increases are accomplished and suggests building more flexibility into the mitigation measures so that they can be designed using future state of the art techniques that may become available at the time that the mitigation measures are triggered and designed.

Refer to Response to Comment 54-2.

COMMENT LETTER 66, RACHEL B HOOPER AND LAUREL L. IMPETT, COMMITTEE FOR GREEN FOOTHILLS, 8/4/00

Pages 1 and 2 of this comment letter summarize comments that are included in more detail on pages 3 through 32. Therefore, comments on these first two pages are not numbered.

Response to Comment 66-1

Comment Summary: The comment states that the CP lacks information on land use intensity and building intensity.

Refer to Response to Comment 44-11 and Master Response 10, Community Plan Description of Density and Intensity of Development.

Definitions of allowable uses within each land use designation are included in the Stanfordproposed Community Plan and addressed in greater detail in the preliminary staff recommendation on the Community Plan dated August 2000.

Response to Comment 66-2

Comment Summary: The comment states that the CP and GUP are inconsistent with the Santa Clara County General Plan, that approval of the CP would render the GP internally inconsistent, and that approval of the CP/GUP would conflict with numerous provisions in the General Plan reflecting development outside cities' urban service areas and the need to protect the biological integrity of critical habitat areas.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

The proposed CP/GUP would result in loss of occupied California tiger salamander habitat. However, the Draft EIR addresses this loss of CTS habitat by establishing a comprehensive mitigation program (BIO-1(a) through (e) - Option 2). Refer to Response to Comment 66-13 for measures included in the mitigation program.

As described in the Response to Comment 66-13 below, the Draft EIR also considers alternatives to the project that avoid loss of California tiger salamander habitat in the foothills area south of JSB. In addition, a third option has been added to the California tiger salamander mitigation program that would further avoid loss of CTS habitat. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander for details on the third mitigation option.

The Draft EIR addresses impacts to California red-legged frog on page 4.8-27. As stated in the Draft EIR, the proposed Community Plan and General Use Permit application do not propose any new development or other activities within or adjacent to any of the creeks in the project area. As proposed by Stanford, modification to the golf course would not have adverse impacts on San Francisquito Creek or the species for which it provides habitat (refer to Master Response 7 - Biological Impacts of Golf Course Redesign). The project would result in the construction of new impervious surfaces, which would increase surface runoff from the project area. In addition, project construction activities and runoff from new developed areas have the potential to result in a degradation of surface water quality. However, mitigation measures included in Section 4.5, Hydrology and Water Quality, would require surface water detention basins, water quality BMPs, and other stormwater management measures that would maintain surface runoff at existing levels and protect water quality. No impacts to California red-legged frog would therefore occur.

Western pond turtle, like California red-legged frog, is associated with permanent water bodies such as the creeks that run through the project area. As described above, the proposed Community Plan and General Use Permit application do not propose any new development or other activities within or adjacent to any of the creeks in the project area, and the proposed modification to the golf course would not have adverse impacts on San Francisquito Creek (refer to Master Response 7 - Biological Impacts of Golf Course Redesign). Further, mitigation measures included in Section 4.5, Hydrology and Water Quality, would require surface water detention basins, water quality BMPs, and other stormwater management measures that would maintain surface runoff at existing levels and protect water quality. No impacts to western pond turtle would therefore occur.

Each of the other sensitive species that could occur in the project area have been specifically identified in the Draft EIR (Tables 4.8-2 and 4.8-3). The potential impacts of the proposed project on these species are addressed in Section 4.8.C. Specifically, endangered, threatened, and rare plant and wildlife species are addressed in Impact BIO-1; CNPS List 3 and 4 species are addressed in BIO-2; and wildlife species of concern are addressed in BIO-4.

As shown on page 4.8-37, the project would result in a loss of up to 40 acres of annual grassland and up to 60 acres of coastal oak woodland/valley foothill riparian habitat. Because oak woodland and riparian oak woodland are considered sensitive native plant communities, loss of these habitats would be mitigated under measure BIO-5. This measure requires Stanford to compensate for the loss of oak woodland and riparian oak woodland habitat through the creation or restoration and long-term preservation of comparable habitat. Restoration, design, compensation ratios, and monitoring requirements are to be determined in consultation with the CDFG to ensure that comparable habitat values are attained in the replacement habitat. See page 4.8-38 of the Draft EIR.

Response to Comment 66-3

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it lacks a clearly defined academic growth boundary.

As stated on page 2-6 of the Draft EIR, the Academic Growth Boundary is part of the Community Plan "strategy to promote compact urban development patterns. As part of this strategy, Stanford has proposed an Academic Growth Boundary (AGB) that contains sufficient land to accommodate the projected growth for the next 10 years, and perhaps longer..." Refer to Master Response 9, Additional Open Space Protection, for additional discussion of the AGB. Also refer to Master Response 1, Statement for or Against the Project or Project Components. The comment's statement that the Academic Growth Boundary should be located elsewhere or serve different purposes does not mean that the project description contained in the Draft EIR is defective.

Response to Comment 66-4

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it fails to identify the total development and redevelopment potential on Stanford lands, specifically on the core campus.

It is beyond the scope of the EIR to evaluate the maximum possible development that could be realized at Stanford. The Draft EIR analyzes the maximum development level for the 10-year period covered by the proposed General Use Permit.

Response to Comment 66-5

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it lacks sufficient detail about Stanford's anticipated academic facilities, including the location and extent of these uses.

Information available from Stanford about proposed academic development is presented in Table 2-2 on page 2-14 of the Draft EIR. This table provides projected additional gross square feet of academic development for each Development District.

Also refer to Responses to Comments 44-11 and 44-12.

Response to Comment 66-6

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it fails to adequately describe all of the development that could occur within the Academic Reserve/Open Space lands.

Refer to Responses to Comments 44-11 and 44-12. The Draft EIR defines the allowable uses within the Open Space and Academic Reserve land use designation on page 2-8. In addition to the definition of uses, the Draft EIR states that any low-intensity academic use consistent with the designation would also require a use permit from the County. Further, the GUP does not include any proposed development within the foothill district, and Stanford's proposed land use designation is essentially the same as the current designation for this area in the 1989 GUP. Thus, the proposed project would not result in increased impacts to this area.

Response to Comment 66-7

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it does not state that the existing "Special Condition Areas" would be deleted from the County General Plan.

The current "Special Condition Areas" are requirements of the 1989 Stanford General Use Permit, and not the Santa Clara County General Plan. The current GUP application does not propose Special Condition Areas. Instead, the proposed CP includes land use designations with a greater level of detail than the current General Plan designations.

Page 4.2-16 and Figure 4.2-5 of the Draft EIR address the proposed CP changes that would affect existing Special Condition areas. Special Condition Area C would be replaced primarily with the Open Space and Academic Reserve land use designation, which would provide similar types of allowable development as Special Condition Area C. Further, the proposed land use designation states that a County use permit would be required for any project proposed for the area. In the Lathrop District, Special Condition Area C would be replaced with a proposed Academic Campus land use designation. The Draft EIR identifies this proposed change as a significant impact, and proposes alternative components (LU-A and LU-B) that would mitigate many of the proposed effects to open space resources.

Response to Comment 66-8

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it does not state where expansion of special conservation areas will occur or under what circumstances.

The project description includes a description of the special conservation areas included in the proposed CP. The Draft EIR identifies that the County may chose to identify additional areas as special conservation as an alternative component. Under this alternative, the County would propose additional areas of special conservation in order to further protect potentially affected resources within the County lands. This change, if necessary, would not result in any additional impacts, or result in the need for further mitigation.

Response to Comment 66-9

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it does not include critical information relating to the GUP process.

Review of individual building projects by the Planning Commission may be imposed by the County through the conditions of the General Use Permit. Such review could be required for individual projects that have been determined, through the environmental or policy analysis of the General Use Permit, to have impacts or implications that would benefit from a higher level of review. A determination regarding a specific scope or scale of projects that would be reviewed by the Planning Commission must be informed by the Draft EIR, but does not serve as the basis for the assessment of impacts in the Draft EIR.

As stated in the Draft EIR, individual projects will be reviewed at a minimum at the Architectural and Site Approval (ASA) Committee level. CEQA requirements for environmental review of individual projects apply equally to both ASA and Planning Commission approval; therefore, the approval authority for the project will not affect the level of future environmental review. In addition, both the ASA and Planning Commission processes must involve public notices and hearings, and both may be appealed to the County Board of Supervisors.

Response to Comment 66-10

Comment Summary: The comment states that the project description is incomplete and therefore inadequate because it does not include sufficient mapping to enable the reader to understand the components of the project or its environmental impacts (i.e., the Palo Alto Urban Service Area is not mapped).

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary. No further specific mapping comments are referenced. Therefore, additional mapping modifications are not possible.

Response to Comment 66-11

Comment Summary: The comment states that the Draft EIR fails to evaluate specific projects contemplated by the GUP, does not provide adequate discussion of biological impacts, and does not provide adequate review of reasonably foreseeable future development.

Refer to Response to Comment 66-5. The Draft EIR has not failed to analyze certain impacts or given them cursory treatment. The Draft EIR properly analyzes the project's potential biological impacts that would result from changes in land use and from specific projects, and proposes mitigation measures that can feasibly reduce those impacts. Because there is limited site-specific information available about future development proposals, the EIR also identifies the fact that further environmental review will be required when specific projects are brought forward by Stanford for approval.

The Draft EIR does evaluate the development that would be allowed under the GUP. Impact analysis has considered proposed housing sites, and impacts according to the Development Districts in which future academic development is generally proposed. Impacts are evaluated based on the environmental resources of each District, and the potential effects that future development could have on those resources. Evaluation of additional development beyond the limits or level of detail prescribed in the GUP would be speculative at this time (CEQA Guidelines Section 15146).

Response to Comment 66-12

Comment Summary: The comment presents legal arguments and judicial precedent to support the assertion that the Draft EIR's assessment of biological resources is legally insufficient and that the biological resources setting in legally inadequate.

The CP/GUP Draft EIR is a program-level document, which analyzes the effects of the project at a level of detail consistent with the level of detail in the project description. The CP/GUP does not provide site-specific project designs. Rather, it sets forth an overall development concept by identifying the types of development that will be allowed in each land use district. Therefore, the EIR cannot feasibly determine what specific locations and resources would be affected by future development projects that may be proposed under the new land use designations (CEQA Guidelines Section 15146).

The EIR provides a level of detail in its analysis of biological resources that is commensurate with the level of detail in the project description by: examining the habitat types in each area where the plan would allow for future development, identifying sensitive resources and special-status species associated with those habitats, and describing the impacts of habitat loss and disturbance on sensitive biological resources.

Due to the large area covered by the project (over 4,000 acres) and the fact that the site-specific details (e.g., location of potential habitat disturbances) of future development projects are not yet known, site-specific data cannot feasibly be obtained. Moreover, the vast majority of biological resources are located in areas where no development is proposed (e.g., in the Open Space and Academic Reserve, Campus Open Space, and Special Conservation land use designations). However, substantial biological data is available for lands within the plan area, and this data has been disclosed in the Draft EIR. The Draft EIR provides mapping of vegetation communities in the plan area (Figure 4.8-1), detailed descriptions of these vegetation communities (pages 4.8-1 through 4.8-4), descriptions of the wildlife assemblages associated with these vegetation communities, a list of all special-status species that occur in similar habitats in the project vicinity, and a complete account of where these species are known to occur on Stanford lands (see Appendix D, Special-Status Species).

Because it is unknown exactly what locations, and therefore what specific resources, could be affected by future development activities, the EIR assumed that the entire acreage of suitable habitat within a proposed development district could be occupied by any special-status species known to occur in similar habitats in the project vicinity. This approach provides a worst-case analysis and ensures that mitigation for special-status species is applied to all suitable habitats in the project area.

The Draft EIR discloses available data on the known occurrences of endangered, threatened, and rare plants in Appendix D. These data are based on Rarefind, the CNPS Data base, and communications with Alan Launer from the Center for Conservation Biology at Stanford. Although lands within the plan area have been subject to study by biological experts among Stanford's staff, students, and professors, no special-status plants have been recorded in any of the areas proposed for new development. Despite the lack of known occurrences of these species, the Draft EIR takes a conservative approach by assuming that any plant species known

to occur in similar habitats in the project vicinity could occur in the project area. The Draft EIR then applies measures to ensure that any such unknown occurrences are identified and mitigated before new development may occur.

Similarly, this approach is used to address nesting raptors and migratory birds. Appendix D discloses all available information about known nesting sites in the project area. Because nest sites may change from year to year, and the CP/GUP build-out will occur over a number of years, the Draft EIR requires that surveys be conducted during the environmental review of individual projects to determine the location of active nests. When a nest is located, disturbance near the nest must be avoided during the nesting season to avoid loss of young or nest abandonment.

The Draft EIR fully documents the location of each habitat type in the project area (Figure 4.8-1). This map may easily be compared to the information provided in Appendix D, which describes the habitat requirements for each special-status species known to occur in the project vicinity.

For example, Appendix D identifies that California tiger salamander occurs in annual grassland habitat. Figure 4.8-1 shows the full extent and distribution of annual grassland habitat in the project area, including the foothills area. To provide a worst-case analysis and ensure that all impacts are fully mitigated, the Draft EIR assumes that all suitable habitat (i.e., annual grasslands) in the project area could be occupied by California tiger salamander. The Draft EIR describes the impact of developing up to 100 percent of the habitat within the development districts, and requires that mitigation be applied to any loss of annual grassland habitat.

Response to Comment 66-13

Comment Summary: The comment presents legal arguments and judicial precedent to the support the assertion that the Draft EIR's analysis of the project's impacts upon biological resources is inadequate.

Refer to Response to Comment 66-12.

Although comprehensive biological surveys were not conducted during preparation of the EIR, reconnaissance-level field surveys were conducted and the EIR did examine and disclose a substantial amount of existing data. Where specific data were not available, the EIR assumed that the entire acreage of suitable habitat within a proposed development district was occupied by any special-status species known to occur in similar habitats in the project vicinity. This approach provides a worst-case analysis and ensures that mitigation for special-status species is applied to all suitable habitats in the project area. For example, all areas of annual grassland-oak woodland habitat in the project area were considered occupied by California tiger salamander, and mitigation was required for any loss of this habitat type. The long-term viability of CTS in the project area is addressed by a comprehensive mitigation program (BIO-1(a) through (e) - Option 2).

A portion of the existing CTS Management Zone is already developed. There are five distinct areas within the CTS Management Zone that are not currently developed with academic,

residential, or recreational uses—these include the Stable Site, the Lower Knoll Site, the Gerona Triangle, the undeveloped area around Lake Lagunita, and portions of the Lathrop district south of JSB. Each of these areas is described in terms of habitat suitability for California tiger salamander on pages 4.8-17 and 4.8-18 of the Draft EIR. The CP/GUP does not propose any new development for the area around Lake Lagunita or in the Gerona Triangle; therefore, the Draft EIR does not analyze a "no development" alternative for these locations. As identified on page S-3, the Draft EIR does consider a "no development" alternative for the Lathrop district (i.e., AGB-B). This alternative would provide a greater level of protection for CTS than provided by the existing land use designation, which is Academic Reserve and Open Space, or by the CTS Management Agreement, which does not preclude future development activities in the Management Zone.

The Draft EIR considers a "no development" alternative for the Lower Knoll (Site J) and Stable housing sites (Site O). This alternative is also a component of a third option to the California tiger salamander mitigation program. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Impacts to raptors are considered in the context of the CEQA Guidelines, Appendix G (impact evaluation criteria), the provisions of the California Fish and Game Code relating to protection of raptors and fully protected species, and the provisions of the Migratory Bird Treaty Act (MBTA). Each of these provides regulatory guidance on dealing with potential impacts to nesting raptors.

The federal Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. 703-711) makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The provisions of the MBTA relate strictly to the take of individuals of migratory species; it does not regulate the protection of foraging habitat.

The California Fish and Game Code defines "take" (Section 86) and prohibits "taking" of a species listed as threatened or endangered under the California Endangered Species Act (California Fish and Game Code Section 2080) or as fully protected (as defined in California Fish and Game Code Sections 3511, 4700, and 5050). Impacts on individuals of those species are considered significant if they result in the following effects: a) direct mortality; b) permanent or temporary loss of occupied habitat that would result in mortality to or reduced productivity of at least one individual of the species; c) avoidance of biologically important habitat for substantial periods resulting in mortality to or reduced productivity of at least one individual of the species.

Appendix G of the CEQA Guidelines includes two evaluation criteria that can be applied to nesting raptors. First, criterion IV.a) states that a project may have a significant effect if it "has a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service." Second, criteria IV.d) states that the project may have a significant impact if it "interferes substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impedes the use of native wildlife nursery sites." The CEQA Guidelines do not define or quantify the terms "substantial adverse effect" or "substantially interfere."

The Draft EIR establishes evaluation criteria with points of significance that can be used to quantify and evaluate the potential impacts of the project based on the requirements of the MBTA, the California Fish and Game Code, and the CEOA Guidelines (pages 4.8-23 through 4.8-25). Three separate criteria and points of significance are established in the Draft EIR to address these regulatory statutes and guidelines-these include criteria numbers 1, 3, and 4. First, the Draft EIR evaluates whether the project would result in the loss of one or more individuals of an endangered, threatened, or rare species (criterion number 1). This would include any raptor that occurs in the project area and is listed, proposed for listing, or a candidate for listing by the U.S. Fish and Wildlife Service or California Department of Fish and Game. Second, the Draft EIR evaluates whether the project would cause a loss of one or more active raptor nest sites, migratory bird nests, or native wildlife nursery sites (criterion number 3). Third, the Draft EIR evaluates whether the project would result in greater than 10 percent loss of habitat for a sensitive wildlife species, where "sensitive" is defined as a Species of Special Concern, a fully protected species, or a locally unique species (criterion number 4). These three criteria, together, evaluate the full range of impacts that may affect a nesting raptor, including loss of active nests or young; loss of one or more individuals of an endangered, threatened, or rare species (either through direct mortality or loss or critical habitat); or loss of habitat for species that are not endangered, threatened, or rare, but which are Species of Special Concern to the resource agencies.

The Draft EIR addresses impacts to California red-legged frog on page 4.8-27. Appendix D of the Draft EIR provides information about known locations of California red-legged frog in the project area. As stated in the Draft EIR, "the proposed Community Plan and General Use Permit application do not propose any new development or other activities within or adjacent to any of the creeks in the project area where California red-legged frog might occur." Proposed modification to the golf course would not have adverse impacts on San Francisquito Creek (refer to Master Response 7 - Biological Impacts of Golf Course Redesign). The project would result in the construction of new impervious surfaces, which would increase surface runoff from the project area. In addition, project construction activities and runoff from new developed areas have the potential to result in a degradation of surface water quality. However, mitigation measures included in Section 4.5, Hydrology and Water Quality, would require surface water detention basins, water quality BMPs, and other stormwater management measures that would maintain surface runoff at existing levels and protect water quality. No impacts to California red-legged frog would therefore occur.

Refer to Master Response 7, Biological Impacts of Golf Course Redesign for a discussion of redlegged frog and steelhead impacts.

Pursuant to the requirements of the Santa Clara County General Plan, a 150-foot setback from the top of stream bank will be maintained along all USGS blue line streams in the project area. Maintenance of this setback, in combination with the measures described in Master Response 7, Biological Impacts of Golf Course Redesign for steelhead and California red-legged frog, would mitigate for potential impacts to western pond turtle by maintaining both riparian habitat and upland areas adjacent to creeks that provide egg-laying and estivation sites for the turtle.

.

Response to Comment 66-14

Comment Summary: The comment presents legal arguments and judicial precedent to the support the assertion that the Draft EIR fails to adequately identify and analyze measures to mitigate impacts upon biological resources.

Refer to Responses to Comments 66-12 and 66-13. This CP/GUP establishes land use designations and provides a framework for future development of Stanford lands. It does not specify building or project footprints. Therefore, it is possible that specific development projects could be situated on a particular site to avoid impacts. The CP/GUP does not preclude avoidance as an option for mitigating impacts to sensitive species.

The CP/GUP does establish mitigation requirements and performance criteria for mitigating impacts where avoidance is not feasible. In the case of rare, threatened, and endangered plant species, these measures call for site-specific surveys "prior to the project-level siting of new development within undisturbed areas." The intent of this measure is to ensure that sensitive plant populations are identified prior to project level approval. To clarify the intent of this mitigation measure, the Draft EIR is revised as follows:

Page 4.8-34. The discussion of mitigation measures for rare, threatened, and endangered plants is revised:

BIO-1(f) through (k): Rare, Threatened, and Endangered Plant Protection Program

(f) Stanford shall retain a qualified biologist to conduct focused surveys for special-status plants prior to the project level siting application for approval of any new development project within undisturbed areas (i.e., the Lathrop Development, and foothills research facilities and recreational improvements). The purpose of these surveys will be to located and identify any special-status plants that may occur in the proposed construction zone. The survey shall be included with Stanford's application for the necessary planning permits from the County or conducted during the analysis process as appropriate.

The analysis of impacts to sensitive native plant communities discloses the maximum acreage of oak woodland and riparian oak woodland that is potentially developable under the proposed CP/GUP. The Draft EIR analyzes a worst-case scenario by assuming that this entire acreage of oak woodland and riparian oak woodland could be lost, and identifies the impact as significant based on this assumption. The Draft EIR requires mitigation for any loss of these sensitive native plant communities. Mitigation required for loss of oak woodland and riparian oak woodland requires restoration of habitat at a minimum rate of 1.5:1 (1.5 acres of restored habitat for each 1 acre of developed habitat). The measure also requires that restoration designs, compensation ratios, and monitoring requirements be determined in consultation with CDFG to ensure that comparable habitat values are attained in the replacement habitat.

The mitigation measures for wetlands and other waters of the U.S. do not rely on preconstruction surveys. As stated on page 4.8-40, a delineation of potential jurisdictional wetlands and other waters of the U.S. must be conducted prior to the application for Architectural and Site Approval of development for each individual site within the CP area. The mitigation measure therefore assures that impacts will be identified prior to project level approval. Further, the mitigation measures in the Draft EIR require that: 1) new projects be sited and designed to minimize impacts to jurisdictional wetlands and waters of the U.S., and 2) any loss of wetlands or other waters of the U.S. that are lost as a result of future development in the project area shall be replaced through the creation, preservation, or restoration of wetlands or other waters of the U.S. of equal function and value to those that are lost.

With respect to nesting raptors and migratory birds, nest sites change from year to year. It is essential to conduct surveys during the season prior to construction to avoid loss of active nests and potential nest abandonment. Setbacks are to be determined in consultation with CDFG and USFWS since appropriate setback distances can vary depending on site-specific conditions and the species involved. Use of setbacks is a standard practice that has been used successfully to minimize the potential for disturbances that could lead to nest abandonment. Setbacks are intended to mitigate temporary impacts during construction periods, thereby avoiding loss of young during the nesting season. The requirement for setbacks from active nest sites applies specifically to criteria #3, "Will the project cause a loss of <u>active</u> raptor nests, migratory bird nests, or native wildlife nursery sites" (page 3.8-23). Other evaluation criteria in the Draft EIR are used to evaluate permanent effects, such as loss of sensitive wildlife habitat and sensitive native plant communities. Please also refer to Response to Comment 66-13.

The Draft EIR provides the justification for its thresholds of significance in Table 4.8-4 (pages 4.8-22 through 4.8-24). The thresholds of significance are based on regulations, statutes and guidelines, local and regional environmental policy, and professional judgment. The threshold of significance for permanent loss of sensitive wildlife habitat, and for loss of CNPS list 3 and 4 plant species, are the only criteria that utilize a 10 percent threshold of significance. This threshold of significance, as explained in Table 4.8-4, is used to define a "substantial" impact for species that are not rare, threatened, or endangered. Criterion IV.a in Appendix G of the State CEOA Guidelines states that a project may have a significant effect if it "has a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service." Because the CEQA Guidelines do not define the term "substantial adverse effect," significance thresholds were established based on professional judgement and other regulatory guidance to allow for a meaningful, quantifiable analysis of impacts. In the case of rare, threatened, or endangered species, the threshold was established at one or more individuals, or greater than 0 acres of critical habitat. For species that are not rare, threatened, or endangered, the threshold was established at a 10 percent or greater loss of individuals or acres of habitat.

The Draft EIR requires that special-status plants within a construction zone be transplanted, and that lost plant habitat be replaced at a ratio of two acres or replacement habitat for each acre of special-status plant habitat lost. The draft EIR further requires that the transplantation program shall be considered to have been achieved if 80 percent or more of the transplanted plants have survived five years after transplantation. The intent of these requirements is to provide for a net gain in sensitive plant habitat, including 80 percent survival of the transplanted plants and sufficient replacement habitat to allow for expansion of the population. Based on input received

from the California Department of Fish and Game, the mitigation program for rare, threatened, and endangered plants has been revised (refer to Response to Comment 101-7) to ensure that impacts are mitigated to less than significant. The 80 percent survival standard has been maintained.

The County agrees that Option 1 of the California Tiger Salamander mitigation program does not adequately mitigate for impacts to this species. This option was evaluated as a feasible mitigation proposed by the project proponent. Option 2 of the California Tiger Salamander mitigation program is consistent with the comment's recommendations (see pages 4.8-32 and 33 of the Draft EIR). If Option 2 is adopted by the County as part of the mitigation requirements for this project, Stanford would be required, as a condition of GUP approval, to implement each of the provisions of the mitigation program before development of projects on the specified sites. As specified in the mitigation program, the habitat easements and other protective measures must be provided "Prior to Architectural and Site Approval of development of sites in the project area north of JSB that contain occupied CTS habitat (including, but not limited to, the Stable Site, Lower Knoll, Gerona Triangle, and the open areas around Lake Lagunita." This measure is intended to apply to all CTS habitat, whether it is north or south of JSB. The Draft EIR is therefore revised to clarify this intent.

Page 4.8-32. The discussion of mitigation measures for California tiger salamander is revised:

BIO-1(a) through (3): Option 2: Alternative CTS Mitigation Program (not proposed by project applicant)

- (a) In order to ensure that there is no net loss of CTS habitat and to provide for the long-term protection and management of CTS habitat at Stanford:
 - (1) Prior to Architectural and Site Approval of development of sites in the project area north of JSB that contain occupied CTS habitat (including, but not limited to, <u>the Lathrop District</u>, the Stable Site, Lower Knoll, Gerona Triangle, and the open areas around Lake Lagunita), Stanford shall provide for the long-term protection and management, through easements or other equally protective mechanism, of an amount of land equal to 3 times the acreage of the occupied portion of the site to be developed.

As with the mitigation requirements for CTS, all mitigation requirements adopted by the County for this project will be made conditions of approval of the GUP. Successful implementation of the mitigation programs will be independently monitored by the County as part of the GUP administration process.

The Draft EIR is revised to reflect changes to the mitigation program for CTS in response to the comment.

Page 4.8-31. The discussion of mitigation measures is revised:

BIO-1(a) through (e): Option 1 and 2: CTS Mitigation Program

- (b) In order to minimize the potential for loss of individual CTS during project construction, the following measures shall be required for construction of projects in the CTS Management Zone.
 - (1) A <u>pPre-construction</u> surveys for CTS shall be conducted at the beginning of during the rainy season prior to construction of any project that would affect potential CTS habitat. Surveys shall be conducted in accordance with CDFG standard procedures for pre-construction surveys. If CTS are found in the construction areas, the University shall consult with CDFG and USFWS to determine if salvage of salamanders is warranted, and if so, what method should be used. The construction area shall be calculated and identified on construction drawings, and the area of impacts shall be monitored by the contractor during construction.
 - (2) Construction vehicles shall be limited to a speed of 10 mph. _This speed limit shall be stipulated in all construction contracts and enforced through regular monitoring of construction sites by the <u>County.</u> Any fuels on these sites shall be double contained and excess asphalt shall be removed from the site upon completion of construction.

Measures relating to habitat management of CTS lands are already specified on page 4.8-33 of the Draft EIR. Both the California Department of Fish and Game and the U.S. Fish and Wildlife Service provided comments on the Draft EIR, each addressing potential impacts to California tiger salamander and recommending changes in the mitigation program. Neither agency recommended a mark and telemetry study. The measure is considered to be unnecessary given the extent of mitigation that is already proposed. The CDFG survey protocol establishes the timing requirements for conducting CTS surveys and this protocol will be followed.

Response to Comment 66-15

Comment Summary: The comment presents legal arguments and judicial precedent to support the assertion that the Draft EIR's analysis of cumulative impacts upon biological resources is inadequate.

The Draft EIR provides a list of cumulative projects in Section 6.3. The Draft EIR includes adequate data on related development projects. The Clark Center, which is referenced in the comment, is being built under the 1989 GUP and is thus considered part of the project baseline. Cumulative impacts have considered in the baseline plus the CP/GUP, plus additional foreseeable projects.

Each topic section (including biological resources) assesses whether the project, plus cumulative projects, would result in a significant impact that was not considered significant under the CP/GUP analysis. For biological resources, the cumulative analysis concluded that several significant impacts would be worsened under the cumulative development scenario and reiterated the mitigation requirements for CP/GUP related impacts. The analysis also concluded that less than significant impacts of the project would not become significant under the project,

plus cumulative project scenario. These less than significant project impacts include loss of individuals or occupied habitat for steelhead and red-legged frog and loss of habitat for sensitive wildlife species.

The CP/GUP does not propose any development within habitat for red-legged frog or steelhead, therefore no CP/GUP related impacts were identified. However, with the proposed golf course realignment plans now available, there may be modifications to San Francisquito Creek if housing is proposed on Hole #1. Master Response 7, Biological Impacts of Golf Course Redesign and Responses to Comments 66-9 and 66-13 address potential impacts to steelhead, California red-legged frog, and western pond turtle from the golf course realignment. Page 4.8-43 provides analysis of the project plus cumulative project scenario for loss of habitat for sensitive wildlife species. This analysis documents that significance criteria would not be exceeded.

The Draft EIR identifies cumulative impacts to California tiger salamander as significant on page 4.8-42: "The impacts of new development to California tiger salamander have been determined to be significant." The Draft EIR also makes clear that the analysis of habitat loss in the Lathrop development district was based on loss of 100 percent of all annual grasslands, so "the 1.5 acres of annual grasslands within the Carnegie project site are already included in the project impact." As stated on page 4.8-41 of the Draft EIR, the EIR for the Sand Hill Road project identifies that grassland habitats in that project area are not suitable for California tiger salamander. Therefore, the Sand Hill Road project would not contribute to cumulative habitat losses for California tiger salamander.

Response to Comment 66-16

Comment Summary: The comment provides information about the value of open space lands, and states that the Draft EIR never discloses the exact amount of open space that would be converted to urban uses under the proposed CP/GUP, calling into question the adequacy of the Draft EIR's project description.

Refer to Master Response 9, Additional Open Space Protection. The Draft EIR project description and open space analysis include acreage information for housing sites and development districts. Sites of proposed housing development are shown on Figure 2-5, with corresponding acreage information provided in Table 2-1. Further, the size of the Lathrop development district is included in Table 2-2. Draft EIR Figure 4.2-4 documents the undeveloped lands that would be developed or redesignated as academic campus under the proposed CP/GUP. The following Table provides a detailed breakdown of the acreage associated with these open space lands under both the CP and Alternative LU-A/AGB-A scenario.

The Draft EIR will be revised as follows:

Table 4.2-3 will be added to the Draft EIR OS-2 impact analysis to document the acreage now designated Academic Reserve and Open Space that is proposed for academic or residential land use (as shown in Figure 4.2-4).

Table 4.2-3

Site Location	Proposed CP Land Use	Approx. Acreage Converted	Alternative LU-A Land Use ²	Approx. Acreage Converted
Lathrop District ³	<u>E-SC</u>	<u>130</u>	<u>E-SC, E-SCO and</u> <u>E-SFR</u>	<u>20</u>
<u>West Campus</u> <u>District</u>	E-SC and E-SR-2	<u>105</u>	E-SCO and E-SR-2	<u>30</u>
Arboretum Corner	<u>E-SC</u>	22	<u>E-SC</u>	<u>22</u>
<u>El Camino</u> Frontage	<u>E-SC</u>	<u>18</u>	<u>E-SC</u>	<u>18</u>
Quarry District	<u>E-SC</u>	<u>6</u>	<u>E-SC</u>	<u>6</u>
Campus Center	<u>E-SC</u>	<u>3</u>	<u>E-SC</u>	<u>3</u>
<u>Total</u>		<u>284</u>		<u>99</u>
	Source: Parsons, September 2000			

Academic Reserve and Open Space Lands Proposed for Academic or Residential Use¹

1 Refer to Figure 4.2-4 for a depiction of the Academic Reserve and Open Space lands proposed for academic or residential use in the CP/GUP.

2 Alternative LU-B would reduce conversion in the Lathrop District to 0 acres, and would include the same acres as the CP/GUP in all other areas, for a total conversion of 154 acres.

3 The Lathrop District acreage does not include the Special Conservation land use designation along San Francisquito Creek.

Response to Comment 66-17

Comment Summary: The comment states that the Draft EIR does not adequately address impacts to open space, including impacts for lands located in the Stanford foothills, the arboretum and golf course, and recreational uses of open space lands.

Refer to Response to Comment 66-6. The Draft EIR analyzes open space impacts on the Stanford foothills. The proposed Academic Campus land use designation for lands located in the Lathrop Development District has been identified as a significant and unavoidable impact in the Draft EIR (page 4.2-20). An alternative land use designation (LU-A) is included in Chapter 7 of the Draft EIR to reduce the identified impact to less than significant. The Draft EIR concludes that clustering the proposed 20,000 square feet of development to less than significant. While the Draft EIR finds that clustering would mitigate the open space impacts of the proposed quantity of development included in the GUP, it also states on page 4.2-20, that a significant and unavoidable impact would remain due to the CP proposed change in land use designation.

The remaining foothill lands would be maintained as either Open Space and Academic Reserve or Special Conservation under the proposed Community Plan.

The Draft EIR provides an adequate analysis of impacts on the core campus lands. Page 4.2-18 of Draft EIR states that with the Campus Open Space designation of the Arboretum, Palm Drive, the Oval, the Stable area, Lake Lagunita and surroundings, and several small open areas within the faculty/staff residential development area, open space will be retained within the central campus at a higher level of protection than currently afforded to the Special Condition Areas. This Campus Open Space designation would allow park-like areas, unimproved open space, landscape buffers, riparian corridors, and conservation areas, with provisions for limited academic or temporary related use in keeping with the open space character. The Campus Open Space designation does not make provisions for any permanent building with an individual County use permit. In addition to the Campus Open Space designation, the proposed CP contains a policy for designation of parks in faculty/staff residential areas at a ratio of 5 acres/1,000 residents. No such policy or requirement currently exists.

Refer to Responses to Comments 22-3 and 23-1. The Draft EIR also provides an adequate analysis of impacts on recreational uses. As noted on pages 4.2-21 and 4.2-22, the Draft EIR concludes that impacts to recreational uses will be significant. Mitigation measures are proposed to ensure that both formal and informal recreational uses (see Mitigation Measure OS-3 on page 4.2-22) will continue to be provided for both the public and Stanford population.

The existing formal recreational uses provided in the faculty/staff subdivision are currently within the existing Campus land use designation and could therefore be developed for academic purposes. The CP proposes redesignation of four of these sites to Campus Open Space, ensuring that they would be available for continued recreational uses. Finally, proposed changes to the golf course would not impact its availability as a recreational resource (refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign). Activities related to the "Dish" area are not part of the proposed project (refer to page 4.2-22 of the Draft EIR).

Response to Comment 66-18

Comment Summary: The comment states that the Draft EIR fails to adequately analyze the cumulative loss of open space, as required by CEQA.

The Draft EIR provides cumulative analysis of open space impacts on page 4.2-26 and 27. The Draft EIR concludes that the GUP, along with other known projects that would have open space impacts in the vicinity of Stanford, would not result in additional open space impacts beyond those resulting from the CP/GUP. The Carnegie project was the only project identified that would have impacts to open space land uses.

While the Draft EIR concluded that there would not be a significant open space impact associated with specific cumulative development projects, the Draft EIR concluded that the proposed CP land use designation for the Lathrop District would result in significant impacts to open space. In order to mitigate the significant impact, the Draft EIR provided alternatives (AGB-A and LU-A) to maintain a majority of the golf course and remainder of the Lathrop District as Campus Open Space and Open Space and Field Research. Infill development in neighboring communities is not considered a significant impact on open space, and any open space impacts from the Sand Hill Road projects were mitigated in the course of approvals for those projects. Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 66-19

Comment Summary: The comment states that the Draft EIR fails to identify mitigation measures to reduce the project's significant impact on open space.

Refer to Responses to Comments 22-3 and 23-1. The Draft EIR includes mitigation measure OS-2 for open space impacts associated with GUP development in the Lathrop Development District. OS-2 would mitigate open space impacts associated with the construction of an additional 20,000 square feet of development in the Lathrop District because it would require the new development to be located adjacent to existing uses of similar character. Further, the existing uses (Center for Behavioral Sciences and the golf course club house) are not highly visible from public viewpoints. Therefore, the development of Lathrop open space lands associated with the GUP are not considered to be a substantial loss of recognized open space when clustered.

The Draft EIR states that impacts associated with the CP proposed land use designation (Academic Campus) for the Lathrop District would be significant and unavoidable because it would remove development restrictions currently provided by the existing land use designation. The Draft EIR concludes that this change could result in much greater future development of this area in subsequent development proposals. As noted in the comment, the Draft EIR includes an alternative component (LU-A) that would change the proposed land use designation from Academic Campus to Campus Open Space and Open Space and Field Research. This alternative would clearly reduce potential open space impacts from the proposed CP land use designation to the golf course and remainder of the undeveloped portions of the Lathrop Development District because intensive development would not be permitted. No further mitigation measures are required.

The Draft EIR addresses core campus open space impacts by comparing proposed campus open space areas with existing Academic Reserve and Open Space lands that would be proposed for development. The conclusions in the Draft EIR are that no impacts to core campus open space will occur. Therefore, no mitigation measures are required. Also refer to Master Response 9, Additional Open Space Protection.

Response to Comment 66-20

Comment Summary: The comment states that the Draft EIR fails to provide adequate analysis of impacts on visual resources.

The Draft EIR addresses visual impacts on recreation use areas, defined as designated recreation sites, parks, trails, or other areas managed for public recreation. These areas include El Camino Park and Matadero Creek Trail. The informal network of trails in the Stanford Dish area are not considered a publicly managed recreational area from which an analysis of visual change is required. However, GUP-development proposed for the Lathrop District would not be highly visible from this trail network due to intervening topography and vegetation. The regional recreational areas that may have views of the Stanford foothills are located too far away to notice é

any changes from the development levels proposed in the Stanford GUP application (20,000 square feet of development in the Lathrop District).

The Draft EIR does not discuss visual impacts from proposed development at the Stable and golf course driving range because these development sites would not be visible from a publicly managed recreation use area. The evaluation criteria does not require analysis from other public viewpoint locations (e.g., Sand Hill Road).

The Draft EIR analyzes impacts to County designated scenic roads on page 4.2-15. The Draft EIR does not state that development would significantly impact views from JSB as stated in the comment. There are three sites where development may be located within 100 feet of JSB. These sites include housing sites K, L and O. The stable site would be located on and around golf course Hole #1. As mentioned in the Draft EIR, development on this site would change the character of views from JSB. However, existing trees within the roadway right-of-way would effectively screen a majority of the proposed development. Further, development that would be visible from JSB would be subject to the County's design review requirements. These requirements shall be used during site specific review of the proposed development to ensure that the project does not exceed significance criteria (i.e., strong visual contrast, obstruction in viewed area of foreground or middle views, or any loss or alteration of a specific scenic resource). In the case of housing site O, the specific scenic resource would be the trees located immediately north of the roadway right-of-way. Faculty and staff housing proposed for housing sites K and L would not change the character of the existing development along JSB, which is predominantly housing in this stretch of the roadway.

The comment's claim that the entire stretch of JSB between Campus Drive West and East would be developed at urban levels is incorrect. The CP/GUP does not propose any development within 300 feet of JSB along this stretch of the roadway.

Response to Comment 66-21

Comment Summary: The comment states that the analysis of alternatives is inadequate and claims that there is only one legitimate alternative, the Reduced Project alternative. The comment says that there is no detailed comparative analysis of alternatives. The comment further claims that alternative Academic Growth Boundary AGB-A does not avoid impacts and that the EIR does not make clear what land use designations would be associated with AGB alternatives. The comment claims that there is no alternative that would preserve CTS habitat immediately west of Lake Lagunita, and references development of housing site F. The comment requests evaluation of the following components: an AGB that is consistent with the Palo Alto urban services boundary, approval of the CP with deferred approval of the GUP, phasing of development, and intensified development of the core campus.

There are a reasonable range of alternatives evaluated in the Draft EIR. Although the Reduced-Project and the two No Project alternatives are the only alternatives that redefine the proposed GUP as a whole, the Draft EIR includes analysis of 23 alternative components that were designed to be combined with the proposed CP/GUP or a reduced project alternative. This greatly expands the range of alternatives available to reduce or avoid significant impacts of the project. As noted on page 7-41 of the Draft EIR, "This approach to alternatives analysis was selected in response to the complexity of the proposed project." Refer to Master Response 2, Reduced Project Alternative, for a discussion of the comparative analysis contained in the Draft EIR. Because footprints for development areas have not been defined it is not possible to definitively quantify the difference in most impacts between the proposed GUP and Reduced Project, however the Draft EIR clearly identifies those areas where impacts could be reduced by the Reduced Project. It is true that some of the alternative components do not avoid or reduce any impacts; however, these alternatives were suggested by the public during a scoping phase and the County made a good faith effort to analyze them in the Draft EIR.

As described in Table 7-3 of the Draft EIR, the alternative Academic Growth Boundaries (AGBs) would correspond to land use alternatives. As stated in Table 7-3, page 7-42 under component LU-A, "This alternative corresponds to alternative component AGB-A above". On the same page, component LU-B is described as follows: "This alternative component corresponds to alternative component ABG-B above because it reflects an AGB along JSB." Thus the comment is incorrect in stating that alternative AGB-A would still redesignate all of the Lathrop District to Academic Campus; this AGB would be tied to a land use designation of Campus Open Space for the entire golf course and Open Space and Field Research for all of the undeveloped portions of the Lathrop District. Only the small portion of the Lathrop District that is already developed would be designated Academic Campus.

The comment provides no reasons as to why clustering 20,000 square feet of development in the existing developed area of the Lathrop Area (thereby avoiding development of currently undeveloped open space areas) does not reduce potentially significant open space and visual impacts.

Alternative AGB-B, which is supported in the comment, would assign a designation of either Campus Open Space or Open Space and Field Research to the Lathrop District. The Campus Open Space designation is deemed to be more appropriate for the golf course, given its use. The golf course would not be consistent with the Open Space and Field Research designation, which would not allow this degree of development. Also refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Regarding comments supporting particular alternative components, refer to Master Response 1, Statement for or Against the Project or Project Components.

The Draft EIR also evaluates an alternative under which housing would not be constructed in the CTS management zone. Alternative component HOUS-J was specifically designed to avoid CTS habitat. This alternative evaluates elimination of housing from Sites F (Driving Range), J (Lower Knoll) and O (Stable Site), with housing to be constructed on the golf course north of JSB instead. Also refer to Master Response 4, Alternative Housing Sites.

An alternative delaying approval of the GUP would not reduce the impacts of the project. Refer to Response to Comment 66-1 for a discussion of the rationale for evaluating the GUP at a program level at an early stage of planning. Analysis of specific projects will be conducted as each project is proposed to determine whether they would result in site-specific impacts. Although the comment requests annual restrictions on development, it does not provide a clear rationale for this request. There are no specific environmental benefits associated with phasing $\sim 10^{10}$

of development, other than some reductions in the intensity of construction impacts. It is expected that development will naturally be phased based on the logical development assumptions of the campus over the next 10 years.

Refer to Master Response 3, Intensified Development Alternative regarding intensifying development of the core campus; Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary and Master Response 9, Additional Open Space Protection regarding preservation of existing open space areas not identified in the Draft EIR.

Response to Comment 66-22

Comment Summary: The comment recommends that the Community Plan be revised to include building intensity and density standards, the CP/GUP be revised to be consistent with the County General Plan, and the environmental document be revised to comply with CEQA.

Refer to Master Response 10, Community Plan Description of Density and Intensity of Development. The Draft EIR has evaluated consistency with the County General Plan and has found the CP/GUP to be consistent. Refer to Table 3-1 starting on page 3-2 of the Draft EIR. The Final EIR addresses all comments received on the Draft EIR, and complies with CEQA and the CEQA Guidelines. Specific comments are addressed above.

COMMENT LETTER 67, BARBARA J. COOKE, P.E., CHIEF, NORTHERN CALIFORNIA COASTAL CLEANUP OPERATIONS BRANCH, CALIFORNIA EPA, DEPARTMENT OF TOXIC SUBSTANCES CONTROL, 8/4/00

Response to Comment 67-1

Comment Summary: The comment recommends that historic site uses be determined and that environmental samples be collected, as necessary, prior to construction of residences to ensure that hazardous substances above acceptable residential levels are not present.

The historical use of Stanford lands is documented in Section 4.7 of the Draft EIR. New residences proposed in the Community Plan would be constructed in existing residential areas of the campus, on land that historically has been vacant, or on land that is part of the fairway for the University's golf course. Environmental releases are unlikely to have occurred in these areas and therefore they have a low probability of containing environmental contaminants in concentrations that would be detrimental to human health.

Areas of the campus suspected of having environmental contamination are known and have been investigated. These areas were investigated as part of the permitting activities associated with the University's compliance with the Resource Conservation and Recovery Act (RCRA). As noted in Section 4.7.A.1, the University has completed a RCRA Facility Assessment and a RCRA Facility Investigation, which were overseen by the Department of Toxic Substances Control. None of the areas suspected of contamination during the RCRA investigations are proposed for residential use. The areas with suspected contamination have been investigated and

remediated, as required, with oversight by the Department of Toxic Substances Control or other state and local regulatory agencies.

Response to Comment 67-2

Comment Summary: The comment states that recent legislation requires that the Department of Toxic Substances Control review and approve all proposed school property acquisitions. The comment recommends that the Department be notified if a new school will be constructed.

Although the CP identifies possible school sites, no school development is proposed in the CP/GUP. It would be the responsibility of the Palo Alto Unified School District to comply with these requirements for any school construction that might be proposed in the future on Stanford lands.

Response to Comment 67-3

Comment Summary: The Department of Toxic Substances Control notes that it can assist Stanford University in overseeing characterization and cleanup activities through its Voluntary Cleanup Program.

As noted in Response to Comment 67-1, Stanford University has investigated its suspected environmental releases during the RCRA Facility Assessment and RCRA Facility Investigation. If environmental releases are discovered in the future, Stanford University would be responsible for conducting appropriate investigative and remedial options, including the Department of Toxic Substances Control's Voluntary Cleanup Program.

Response to Comment 67-4

Comment Summary: The Department of Toxic Substances Control requests that it be included in meetings where issues relevant to their statutory authority are discussed.

As noted in Section 4.7.C, it is Stanford University's policy to comply with all laws and regulations relating to hazardous waste and hazardous materials. In accordance with these laws and regulations, Stanford University and/or the County of Santa Clara would be required to notify the Department of Toxic Substances Control whenever issues arise that are relevant the Department's statutory authority.

COMMENT LETTER 68, KAREN J. MILLER, CHIEF, ENDANGERED SPECIES DIVISION, U.S. FISH AND WILDLIFE SERVICES, 8/4/00

Response to Comment 68-1

Comment Summary: The comment recommends that the County and Stanford University coordinate with the U.S. Fish and Wildlife Service (USFWS) on California red-legged frogs and that they also coordinate with the National Marine Fisheries Service (NMFS) and California

Department of Fish and Game (CDFG) on protected anadromous fish to ensure that all University and County actions comply with the federal Endangered Species Act.

The County and Stanford will continue coordination as individual projects emerge.

Response to Comment 68-2

Comment Summary: The comment asserts that Stanford University's development activities have increasingly encroached on California tiger salamander upland habitat surrounding Lake Lagunita, the species primary breeding pond and that these habitat losses pose a threat to Stanford's salamander population.

The Draft EIR acknowledges that the proposed CP/GUP would have significant impacts on California tiger salamander, and proposes mitigation for these impacts.

Please also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 68-3

Comment Summary: The comment asserts that Stanford University's development activities encompass numerous individual projects not anticipated by the interagency California tiger salamander Management Agreement signed by the University; CTS mitigation for these projects is infeasible, according to the USFWS.

Please refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 68-4

Comment Summary: The comment requests that the driving range be restored as CTS habitat and that the upland California tiger salamander habitat of the Lower Knoll and vicinity, Gerona Triangle, the Lathrop District, and all open space between these locations and Lake Lagunita, be preserved in perpetuity by conservation easement or comparable mechanism.

Please refer to Master Response 4, Alternative Housing Sites; Master Response 7, Biological Resource Impacts of Golf Course Redesign; and Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 68-5

Comment Summary: The comment requests that California tiger salamander emerging from the Lake Lagunita breeding site be given safe passage to the south across Junipero Serra Boulevard. The comment also asserts that the salamander tunnel under construction is behind schedule and inadequate; recessed channels covered by open grates at road level with barriers to keep animals on course are suggested as more effective structures for CTS to be completed within 3 years. USFWS suggests that design, testing, adaptation, construction, and management of such structures could be considered as mitigation.

Please refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 68-6

Comment Summary: The comment suggests that the mitigation pond's success are in doubt and wants mitigation sites on flatter lands; recommends that mitigation measures greatly exceed impact areas; and requests permanent conservation easements over any biological mitigation lands, to be required by the County

Please refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

COMMENT LETTER 69, CHARLES TAUBMAN, 8/4/00

Response to Comment 69-1

Comment Summary: The comment states that Stanford should not propose more academic growth or population, but should focus only on adding housing.

Refer to Master Response 1, Statement for or Against the Project or Project Components, Master Response 3, Intensified Development Alternative, and Master Response 4, Alternative Housing Sites.

Refer to Comment Letter 39 for responses to the comments appended to the end of this comment.

COMMENT LETTER 70, CHRISTEN CARLSON OSBORNE AND JANET RUTHERFORD, 8/4/00

Response to Comment 70-1

Comment Summary: The comment expresses opposition to Stanford's proposal, stating that the cost of proposed plans is too high a price.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Refer to Comment Letter 72 for responses to the comments appended to the end of this comment.

COMMENT LETTER 71, T.J. CONNELLY, 8/4/00

Response to Comment 71-1

Comment Summary: The comment is concerned that the open space provided by the Stanford golf course will be slowly reduced to high-density housing.

Refer to Master Response 4, Alternative Housing Sites and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 72, JANET RUTHERFORD, 8/4/00

Response to Comment 72-1

Comment Summary: The comment states that Stanford should confine building to housing and refurbishing academic building, suggests that no more sports facilities are needed, recommends that any growth occur in locations other than the existing campus, and that multi-story parking structures and trolleys or jitneys should be used.

Refer to Master Response 1, Statement for or Against the Project or Project Components. Also refer to Master Response 3, Intensified Development Alternative, for discussion of Stanford's plans for parking structures.

COMMENT LETTER 73, DENIS R. COLEMAN, 8/4/00

Response to Comment 73-1

Comment Summary: The comment urges preservation of the golf course, with housing closer to the center of campus.

Refer to Master Response 3, Intensified Development Alternative; Master Response 4, Alternative Housing Sites; and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 74, KATHY DURHAM, 8/5/00

Response to Comment 74-1

Comment Summary: The comment states that there are now close to 10,000 cars on Stanford Avenue near El Camino Real. The 1989 GUP had projected a growth of 600 new cars of which 50 percent were to be associated with Stanford. Instead there has been a growth of 1,700 vehicles. Stanford Avenue is now one of the highest volume residential collector streets in Palo Alto. At the other end of Stanford Avenue, near Juniperro Serra Boulevard, the increase was 3,500 cars. These are significant impacts for a residential area to absorb.

As indicated previously in the Response to Comments 14-5, 14-7, 62-1, 62-2, and 62-3 the Draft EIR contains provisions for Stanford's participation in and contribution of fair share funding for neighborhood traffic studies and mitigation measures. As indicated in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the city to determine the proportion of cut-through traffic associated with Stanford. Stanford's participation will be coordinated through the County Planning Office. Stanford will then be responsible for its fair share of any mitigation measures.

Response to Comment 74-2

Comment Summary: The comment states that it is not known how much of the increased volume on Stanford Avenue is due to the University's growth under the current GUP because there was no requirement to monitor what happened. The comment supports Palo Alto's proposal that Stanford prepare an "integrated transportation plan" including the Research Park and Shopping Center as well as the core campus and the Medical Center.

Refer to Response to Comment 14-5. It is noted that the comment supports the City of Palo Alto's proposal that Stanford prepare an "integrated transportation plan" including the Research Park and the Shopping Center as well as the core campus and the Medical Center. Such as plan is not required to mitigate project impacts and is outside the scope of County authority.

Response to Comment 74-3

Comment Summary: The comment states that monitoring of traffic volume and speeds on the roads surrounding Stanford lands should be required, and the necessary origin/destination studies be done to evaluate Stanford's fair share of cut-through traffic on collector and local streets as well as arterial. Studies should be conducted independently and reviewed by non-Stanford transportation professionals familiar with current local traffic patterns.

As indicated previously in the Response to Comment 14-5, any monitoring of traffic would be conducted by a qualified and unbiased consultant retained by the County with appropriate funding from Stanford. Refer also to Response to Comment 34-5.

Response to Comment 74-4

Comment Summary: The comment supports the goal of "no net new commute trips", but also urges a comprehensive trip reduction program for all campus residents – not just commuters.

Refer to Response to Comment 14-5. Although Stanford's Traffic Demand Management (TDM) program will be used to achieve the goal of "no net new commute trips", many elements of the TDM program, such as transit passes, the Marguerite shuttle, bicycle support, and other measures will help to reduce all trip types. Mitigation TR-6B as described on page 4.4-107 of the Draft EIR requires Stanford to prepare site-specific traffic studies for large projects allowed in the GUP development. These traffic studies will address traffic generation, trip distribution, project access, safety and the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities as deemed appropriate by the County Planning Office. Appropriate mitigation measures will be developed in the study, conditioned through the County review and approval process, and implemented by Stanford.

Response to Comment 74-5

Comment Summary: The comment requests physical traffic calming measures on Stanford Avenue to slow cars down and reduce the temptation to cut through the neighborhood. These measures need to be in place around the clock, not just at peak commute periods. These should be implemented simultaneously with the construction of housing, not after the already serious situation has worsened further.

.

.

As indicated previously in the responses to Comments 14-5 and 14-9, the Draft EIR contains provisions for Stanford's participation in and contribution of fair share funding for neighborhood traffic studies and mitigation measures. As indicated in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the city to determine the proportion of cut-through traffic associated with Stanford. Stanford's participation will be coordinated through the County Planning Office. Stanford will then be responsible for its fair share of any mitigation measures including physical traffic calming measures identified as necessary by those studies. Almost all physical traffic calming measures would remain in place around the clock since it is generally not feasible to remove and replace such features on a daily basis.

COMMENT LETTER 75, LINDA COHEN, 8/5/00

Response to Comment 75-1

Comment Summary: The comment requests further options be studied to minimize impacts resulting in the overwhelming congestion in our neighborhoods.

Refer to Master Response 2, Reduced Project Alternative and Master Response 3, Intensified Development Alternative.

Response to Comment 75-2

Comment Summary: The comment requests study of an alternative academic growth boundary that respects Palo Alto's urban growth boundary.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 75-3

Comment Summary: The comment states that a stronger linkage between academic development and housing should be studied in the EIR to ensure that the academic development does not outpace the housing.

Mitigation Measure PH-3 addresses the linkage of housing to academic development and will require the University to construct student housing prior to, or concurrently with, the construction of additional academic space. Also refer to Master Response 2, Reduced Project Alternative.

Response to Comment 75-4

Comment Summary: The comment requests that the reduced project alternative be studied in more detail.

Refer to Master Response 2, Reduced Project Alternative.

Response to Comment 75-5

Comment Summary: The comment requests Stanford protect the foothills from further development and maintain access to the public in order to offset the impacts of their proposed growth.

Refer to Master Response 9, Additional Open Space Protection. The Draft EIR proposes that Stanford dedicate land within the foothills for use as trail corridors as proposed in the County Trails Master Plan. This mitigation measure has been recommended to accommodate increased recreational demand and provide non-motorized transportation routes to offset additional traffic congestion that will be associated with proposed CP/GUP development.

COMMENT LETTER 76, DON KNOTT, 8/5/00

Response to Comment 76-1

Comment Summary: The comment states that proposed changes to the golf course would ruin its existing character and ambiance.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

Response to Comment 76-2

Comment Summary: The comment indicates that constructing housing on the golf course would compromise the integrity of the Red Barn by removing the open space buffer around it.

The Palo Alto Stock Farm Horse Barn (Red Barn) was listed on the National Register of Historic Places (NRHP) in 1985 (Register No. 85003325). Because of its NRHP listing, any adjacent development that may pose a risk to the integrity (e.g. setting, feeling, association) of the Red Barn must be reviewed by the California State Historic Preservation Office (SHPO) and if necessary, the Advisory Council on Historic Preservation (the "Council"). The purpose of this review process is to provide guidance in the design and siting of the new development and to aid in the development of appropriate mitigation measures to ensure that the structure's historical integrity is not compromised.

In order to ensure the preservation of all currently listed historical resources (on the federal, state, and local level) and to clarify Santa Clara County's Historical Heritage Commission (HHC) role in preservation issues, the following changes shall be made to item (a) of Mitigation Measure HA-1:

Mitigation: HA-1: Protection of Historic Resources

(a) If a construction project to be carried out pursuant to the General Use Permit includes remodeling of, or development that could physically affect, a structure that is included in the Santa Clara County Heritage Resource Inventory, the California Register of Historical Resources, or the National Register of Historic Places, or that County planning staff determines is eligible for listing or is a potential historic resource, the following shall apply:

 <u>Remodeling</u>: The remodeling shall be conducted following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995).

If the structure to be remodeled is not on the County Inventory, but is 50 or more years old, Stanford will assess the structure to evaluate whether it appears eligible for inclusion in the County Inventory, and will submit its assessment to County planning staff for independent review. If County planning staff determines that the structure is potentially eligible for the Inventory, or is a potential historic resource, planning staff will submit the assessment to the Santa Clara County HHC for review. If the structure is determined to be eligible, then the mitigation described above shall be required.

2. New Development: New development plans shall be reviewed by the Santa Clara County HHC for appropriateness of design and siting to ensure that the historical significance of the structure is not adversely affected. If the structure is listed on the California Register or the National Register, the HHC shall request SHPO comment prior to approving the proposed project.

This would mitigate the impact of the remodeling <u>or adjacent development</u> to a less-than-significant level as identified is Section 15064.5 of the CEQA Guidelines.

If the structure to be remodeled is not on the County Inventory, but is 50 or more years old, Stanford will assess the structure to evaluate whether it appears eligible for inclusion in the County Inventory, and will submit its assessment to County planning staff for independent review. If County planning staff determines that the structure is potentially eligible for the Inventory, or is a potential historic resource, planning staff will submit the assessment to the Santa Clara County HHC for review. If the structure is determined to be eligible, then the mitigation described above shall be required.

Response to Comment 76-3

Comment Summary: The comment states that the proposed trails included in the County Trails Master Plan should not bisect the golf course and should be rerouted around the golf course.

The Draft EIR includes a mitigation measure to require the dedication of a trail easement for the two trails that cross Stanford lands and are included in the County Trails Master Plan. Policy SCP-OS-7 of the proposed Stanford Community Plan requires Stanford to work with local agencies to define more precise trail alignments for the portion of the trails crossing Stanford lands as described in the County Trails Master Plan. Prior to dedication of an easement and construction of trail improvements, constraints such as the location of San Francisquito Creek and the Stanford Golf Course will have to be considered.

COMMENT LETTER 77, PENNY KATZ, 8/5/00

Response to Comment 77-1

Comment Summary: The comment is concerned about the proposed restrictions on public access within the Dish area.

Refer to Response to Comment 23-1.

COMMENT LETTER 78, SANDY FORREST, 8/5/00

Response to Comment 78-1

Comment Summary: The comment requests that development of the dish area not be approved.

Refer to Master Response 1, Statement for or Against the Project or Project Components and to Master Response 9, Additional Open Space Protection, and Response to Comment 23-1.

COMMENT LETTER 79, ERIC FERTIG, 8/6/00

Response to Comment 79-1

Comment Summary: The comment states that the Santa Clara County General Plan is not in compliance with Section 65560 of the California Government Code for failing to identify the Stanford Refuge (F&G Code 10836) as an open space resource.

Refer to Response to Comment 23-5.

Response to Comment 79-2

Comment Summary: The comment states: The Stanford Community Plan should identify the Stanford State Game Refuge as an open space resource as prescribed in section 65560 of California Government code.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 79-3

Comment Summary: The comment asserts that the EIR should obtain comments on cumulative impacts of the project to the integrity of the State Game Refuge pursuant to Section 21104 of the Public Resources Code.

The Draft EIR was submitted to the Department of Fish and Game for review. The Department of Fish and Game expressed no concerns about the impacts of the project in relation to the University's status as a game refuge. Wildlife impacts were analyzed in Section 4.8 of the Draft EIR. The projects cumulative effects on animals were analyzed in Section 4.8.D. The property's status as a game refuge does not alter this analysis.

Response to Comment 79-4

Comment Summary: The comment states that the request in Comment 79-3 only pertains to proper disclosure of the existence of the Stanford Game Refuge.

The comment has been addressed in terms of the status of the game refuge.

COMMENT LETTER 80, HOWARD FRANKLIN, 8/6/00

Response to Comment 80-1

Comment Summary: The comment states that public review of the CP/GUP has lacked discussion of the impact to community services and facilities, specifically dance, sports, arts and science programs.

Refer to Response to Comment 3-2.

Response to Comment 80-2

Comment Summary: The comment states that Stanford's proposed development will further impact recreational programs and the County should require Stanford to provide facilities to accommodate these needs with the approval of the CP/GUP.

Refer to Response to Comment 3-2. The Draft EIR includes a mitigation measure (OS-3) on page 4.2-22 that will require Stanford to improve campus open space lands in the faculty/staff subdivision to provide recreational opportunities for the campus population. Refer to Response to Comment 75-5 for a discussion of the proposed trail dedication requirements.

Response to Comment 80-3

Comment Summary: The comment states that the Terman site is the most logical site for the third middle school as that location would be the closest available to serve a substantial middle-school population area. The City of Palo Alto should also be encouraged to develop a master plan for the entire Hyatt and Elks Club area, have Stanford pay a large impact fee, and use the money for the City of Palo Alto to purchase part of the area for building a community service facility which could in part, be leased to the Jewish Community Center.

Refer to Responses to Comments 3-2 and 55-5. It is beyond the scope of this EIR to evaluate the appropriateness of specific sites for schools. This determination will be made by the Palo Alto Unified School district. The District will also be the one to determine the level of funding needed to expand school capacity to meet anticipated enrollment or whether an additional school should be constructed. It is also beyond the scope of this EIR to discuss a master plan for the Hyatt and Elks Club areas.

COMMENT LETTER 81, WALTER SEDRIKS, 8/6/00

Response to Comment 81-1

Comment Summary: The comment suggests that Stanford's proposed ban on dogs at the Dish is discriminatory to women based upon their need to have a dog accompany them to the Dish for safety.

Refer to Master Response 1, Statement for or Against the Project or Project Components. This comment is outside the scope of an EIR. Stanford's access policies for the Dish area are not part of the proposed project. Refer to Response to Comment 23-1.

Response to Comment 81-2

Comment Summary: The comment urges the Planning Commission to ensure that the development by Stanford is mitigated by not only open space, but open space accessible to the surrounding community at large.

Refer to Master Response 9, Additional Open Space Protection and Response to Comment 23-1.

COMMENT LETTER 82, PAUL GARDNER, 8/6/00

Response to Comment 82-1

Comment Summary: The comment requests that the Stanford foothills be protected against development.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; and to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 83, JOANNE MARENT, 8/6/00

Response to Comment 83-1

Comment Summary: The comment opposes development of foothills.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; and to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 84, RICHARD HARRIS, ESQ., COMMITTEE TO SAVE STANFORD GOLF COURSE, 8/7/00

Response to Comment 84-1

Comment Summary: The comment expresses concern about the proposal to use the site of golf course Hole #1 for housing and asks where the hole would be replaced. The comment also asks whether plans for widening Campus Drive West would affect the golf course.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign regarding additional details about the relocation of Hole #1. If housing is proposed for the driving range site, the driving range will be relocated to the Sand Hill Road site shown on Figure 7-3. Possible widening of Campus Drive West is identified as an anticipated project in the GUP application. When a project application is submitted to the County, it will review the application to determine if any new, or more severe significant impacts would result. Until that time, the County cannot determine if the golf course would be affected. The foothills roadway will not be included in the approved project. The Draft EIR analyzed it as an alternative component and found that it would result in additional significant impacts. The foothills roadway is not proposed by Stanford.

Response to Comment 84-2

Comment Summary: The comment indicates that the Stanford Golf Course is a historic golf course, the final work of a master architect, home to several of history's greatest golfers, and a landmark in the golf community.

Please refer to Master Response 8, Historical Significance of the Golf Course.

Response to Comment 84-3

Comment Summary: The comment states that the golf course is a recreational resource not only for Stanford, but also the Mid-Peninsula golfing community.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign. The golf course will not be closed or excluded from future use by the golfing community due to the proposed realignment, nor is there any evidence to suggest that community members or charitable organizations will reduce their use of the golf course due to the realignment plans proposed as part of the CP/GUP.

Response to Comment 84-4

Comment Summary: The comment asserts that the golf course succeeds as a nature sanctuary based upon August 2, 2000 letter of report from Wetland Research Associates, Inc. confirming that California tiger salamander live on the golf course, the first seven holes provide good aestivation habitat, and the seasonal drainage ditch feeding Lake Lagunita (running through holes 1, 6 and 7) provides a protected migration corridor for California tiger salamander; the golf course has a high density of special status species; relocation of a single hole would wreak

havoc on the natural habitat of the course; great stand of heritage oaks between holes 5, 6 and 7, would be a likely victim.

Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign.

Response to Comment 84-5

Comment Summary: The comment questions whether affordable housing truly requires use of golf course lands, and suggests that Stanford should have used past development sites for faculty/staff housing and that other infill sites are available.

Evaluation of Stanford's past use of available development parcels is outside the scope of this EIR. Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

Response to Comment 84-6

Comment Summary: The comment states that the Draft EIR is deficient for failure to point out plan inconsistencies with Santa Clara County General Plan policies R-LU-67, R-LU-68, and U-ST-5.

The County General Plan policies identified in the comment are addressed below.

R-LU 67. The Community Plan proposes to modify the land use of the golf course from Academic Reserve and Open Space to Academic Campus. The Community plan approval will result in a General Plan amendment. The process for preparation, analysis and proposed adoption of the Stanford Community Plan follows the County's procedures for a General Plan amendment. The proposed action is therefore consistent with policy R-LU 67.

R-LU 68. This policy does not require that the necessity for change in land use be identified or that this designation must apply to lands with the identified characteristics. As stated above, the Community Plan includes a change in land use for golf course lands. This change is requested in order to allow for approval of housing development proposed as part of the GUP application. These lands are proposed for land use modification because of their future academic and housing potential. The proposed action is therefore consistent with policy R-LU 68. Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 9, Additional Open Space Protection regarding the impacts to open space from development of Hole #1. Regarding the necessity for the change in land use and development of Hole #1, refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites. The County will consider an alternative that would maintain Hole #1 of the golf course by relocating a portion of the proposed faculty/staff housing to the Searsville Block housing site (site G).

U-ST 5. The impacts of construction of faculty/staff housing on Hole #1, and the resulting need to realign holes one through seven of the Stanford golf course are not significant. Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, Master Response 7, Biological Impacts of Golf Course Redesign, and Master Response 8, Historical Significance of Golf Course. The Draft EIR has assessed the impacts of the proposed land use

.

amendment and recommended mitigation measures or alternatives to reduce impacts associated with use of Hole #1 to a less than significant level. The proposed action is therefore consistent with policy U-ST 5.

Response to Comment 84-7

Comment Summary: The comment states that the Draft EIR is deficient for failure to point out plan inconsistencies from Stanford Community Plan Growth and Development policies SCP-GD 4, SCP-GD 12, SCP-GD (i)2, and SCP-GD (i)4.

Because these policies are in the proposed Stanford University Community Plan that has not been adopted by the County, these comments address the internal consistency of the proposed CP and not the environment. Refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 84-8

Comment Summary: The comment states that the Draft EIR is deficient for failure to point out plan inconsistencies from Stanford Community Plan Land Use policy SCP-LU (i)(2) and Land Use Strategy number 3.

Because these policies are in the proposed Stanford University Community Plan that has not been adopted by the County, these comments address the internal consistency of the proposed CP and not the environment. Refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 84-9

Comment Summary: The comment states that the Draft EIR is deficient for failure to point out plan inconsistencies related to open space policies of the Stanford Community Plan and City of Palo Alto and Menlo Park General Plans.

Because many of these policies are in the proposed Stanford University Community Plan that has not been adopted by the County, these comments address the internal consistency of the proposed CP and not the environment. Refer to Master Response 1, Statement for or Against the Project or Project Components. The Palo Alto and Menlo Park policies are addressed below.

Palo Alto Policy L-1. Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Menlo Park Policy I-G-8. Refer to Master Response 7, Biological Impacts of Golf Course Redesign.

Menlo Park Policy I-G-13. Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and the discussion regarding policy SCP-RC (i)27 above.

Menlo Park Policy I-I-5. The realignment of the golf course will not physically impact the City of Menlo Park. The realignment will not result in significant traffic, air quality, noise or visual impacts to the adjacent Menlo Park lands.

Response to Comment 84-10

Comment Summary: The comment states that the Draft EIR inadequately analyzes the effects of the proposed medium-density residential development on Hole #1 of the golf course as an incompatible land use with the adjoining horse stables.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites for discussion concerning alternative sites for the proposed golf course housing.

County policies and regulations do not prohibit the location of housing near stables. Stables that meet County health code standards are considered to be compatible with residential development.

Response to Comment 84-11

Comment Summary: The comment indicates that the Stanford Golf Course is a historic golf course and meets three of the four CEQA criteria for listing on the California Register of Historical Resources.

Please refer to Master Response 8, Historical Significance of the Golf Course.

Response to Comment 84-12

Comment Summary: The comment states that the Draft EIR did not adequately analyze the effects of damage or destruction to the golf course on the quality of public recreation.

Refer to Master Response 4, Alternative Housing Sites, Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, and Master Response 8, Historical Significance of Golf Course.

Response to Comment 84-13

Comment Summary: The comment requests additional information about the proposed relocation of Hole #1 of the golf course and the driving range.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, which provides additional information about the proposed relocation and Master Response 7, Biological Impacts of Golf Course Redesign. Detailed design of new facilities has not been accomplished, and would be reviewed as part of the application for new facilities, including an environmental assessment.

.

į,

Response to Comment 84-14

Comment Summary: The comment states that the Draft EIR contains no analysis of alternative HOUS-B, and does not contain a routing plan for the area in which the first seven holes would be relocated. The comment also states that the Draft EIR is inadequate because there is no detailed plan for the widening of West Campus Drive.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, which discusses reconfiguration of holes one through seven. HOUS-B was developed as an alternative component in an effort to identify other locations for housing sites within the core campus area that are proposed for sites within the California tiger salamander management area. According to CEQA, alternatives need not be analyzed to the same level of detail as the proposed project. The analysis of this component is presented on page 7-42 of the Draft EIR, which found that relocating the golf course to an area south of JSB would have open space, visual, and biological resources impacts to the Stanford foothills.

Stanford has not submitted plans for the widening of Campus Drive West. Site-specific environmental review of the proposed roadway widening would have to be conducted at the time that an application for the project is submitted to the County. With the proposed relocation of Hole #1 of the golf course, the road widening would not affect the golf course, because new housing would be built on the site. The impacts of development of the site are addressed in the Draft EIR.

Response to Comment 84-15

Comment Summary: The comment asserts that the Draft EIR inadequately discloses studies of California tiger salamander habitat in the vicinity of holes 2-7 and other special status species in the vicinity of hole 1; and heritage oak woodland, and impacts to California tiger salamander mitigation measures.

Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign and Master Response 11, California Tiger Salamander Mitigation Measures.

Response to Comment 84-16

Comment Summary: The comment states that the Draft EIR should study infill sites as alternatives to housing on the golf course.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

Response to Comment 84-17

Comment Summary: The comment states that the Draft EIR should study the change in zoning from the current A1, 20 acre minimum zone in which the golf course now sits, to the Academic Campus and Residential-Medium Density land use designation proposed by Stanford.
Refer to Response to Comment 55-1. A new General Plan designation does not necessarily lead to a change in zoning.

Response to Comment 84-18

Comment Summary: The comment states that the Draft EIR is inadequate for its failure to study the reciprocal traffic impacts of the proposed clustered residences on the 38-acre Stable Site, with the existing and anticipated traffic on Campus Drive West, and particularly rush hour traffic. Will a traffic light be required so that the Stable Site dwellers can get out of their parking lots at rush hour? What will be the effects on the rush hour traffic of such lights, or alternately of the residents trying to push their way into traffic at high-volume traffic times?

It is assumed that "reciprocal traffic impacts" are the same as "traffic impacts". With respect to addressing cumulative impacts, the traffic impact analysis in the Draft EIR is based on a cumulative scenario for the year 2010. It incorporated the proposed distribution of development in the GUP, including the proposed housing. The purpose of the traffic analysis in the Draft EIR was to evaluate the overall impacts of the CP/GUP on traffic, not to address site access issues for specific housing or academic development sites. As indicated previously in the Responses to Comments 14-5, 24-2, 24-3, 31-3, 34-1, and 74-4, mitigation TR-6B as described on page 4.4-107 of the Draft EIR requires Stanford to prepare detailed site-specific traffic studies for certain projects allowed in the GUP development. These projects will potentially include, but not be limited to, redevelopment of Escondido Village, the stable housing site, the Performing Arts Center, the sports arena expansion, Stanford Avenue housing, and major parking structures, among others. These traffic studies will address traffic generation, trip distribution, project access, safety and the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities as deemed appropriate by the County Planning Office. The analysis of project access would include determination of what type of traffic control device, if any, would be necessary to allow the residents of the Stable site to be able to enter and exit their parking facilities during the AM and PM peak hours (also referred to as rush hour), when traffic volumes are highest. It is important to note that all traffic analysis for this Draft EIR has been performed for the AM and PM peak hours in accordance with the standards of practice for traffic engineering analysis and the requirements of the local jurisdictions. Appropriate mitigation measures for any new significant site-specific impacts will be developed in the site-specific study, conditioned through the County review and approval process, and implemented by Stanford to reduce any potential impacts to less than significant levels.

Response to Comment 84-19

Comment Summary: The comment states that the Draft EIR does not recognize that the golf course is outside the Palo Alto Urban Service-Area boundary.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 84-20

Comment Summary: The comment states that the Draft EIR fails to note the positive effects of the golf course on air quality.

While it is possible the golf course provides localized cooling, this would be limited to the golf course itself to a significant extent. The golf course has no "cleaning" capacity for criteria pollutants (nitrogen oxides, sulfur oxides, carbon monoxide, lead, volatile organic compounds or fine particulate matter) nor for toxic air contaminants. The localized cooling effect of the golf course would not be changed by the relocation of one hole of the course and resulting reconfiguration.

Response to Comment 84-21

Comment Summary: The comment states that the golf course provides a buffer between the campus core and adjacent neighborhoods and reconfiguration of the golf course may negatively affect noise levels in both areas.

The relatively minor changes in the golf course proposed as part of the GUP would not affect its function as a buffer between the academic campus and adjacent residential areas. The golf course would remain in essentially the same location.

Response to Comment 84-22

Comment Summary: The comment states that the golf course lands located in the West Campus Development District should be treated the same as the golf course lands located in the Lathrop Development District in respect to their value as open space.

Refer to Response to Comment 22-3.

Response to Comment 84-23

Comment Summary: The comment states that the Draft EIR fails to evaluate an Academic Growth Boundary (AGB) that protects the entire golf course from development. The comment also supports the Draft EIR's conclusion that the new roadway linking the campus to I-280 has a number of significant impacts.

The Draft EIR evaluates three alternative locations for the AGB, which provides a reasonable range of options for the County. However, the County could adopt an AGB that is more restrictive. This action would not result in adverse environmental impacts aside from a potential inability to provide adequate housing sites.

The Draft EIR identifies the impacts of the new roadway alternative component.

Response to Comment 84-24

Comment Summary: The comment states that the Draft EIR should include an alternative that would not result in housing development on the golf course, to reduce impacts to open space.

Refer to Master Response 4, Alternative Housing Sites.

Response to Comment 84-25

Comment Summary: The comment states that the Draft EIR should include an alternative that would not result in housing development on the golf course, to reduce impacts to recreation.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 4, Alternative Housing Sites.

Response to Comment 84-26

Comment Summary: The comment states that development on Hole #1 of the golf course would have a negative impact on open space views, to neighborhoods adjacent to the golf course, and those traveling along Sand Hill Road.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Response to Comment 66-20. The housing proposed for Hole #1 of the Stanford golf course would not affect foreground views from any adjacent private residences or alter public views. The nearest private residences are located on the west side of Sand Hill Road. The nearest public views of the proposed housing site are from JSB. Additional potential development on the golf course is limited by the Sand Hill Road Development Agreement and the proposed distribution of development in the GUP application. Page 4.2-15 (OS-1) discusses the CP/GUP's less than significant impact on views from JSB.

Response to Comment 84-27

Comment Summary: The comment states that the "Draft EIR fails to consider the potential increase in campus facilities, and therefore potential unanswered demand for housing, the change at the golf course from Campus Open Space to Academic Campus."

It appears that the comment is asking for analysis of potential academic development that could occur on the golf course, and the resulting demand for additional housing that would result. The GUP proposes 20,000 square feet of academic development for the Lathrop District. The Draft EIR provides a mitigation measure that requires this development to be placed adjacent to existing development. This would prohibit the development within the golf course south of JSB. The GUP does not propose any academic development for the West Campus district and this development potential is further limited by the Sand Hill Road Development Agreement. Therefore, it would be speculative for the Draft EIR to analyze potential housing demand from academic development within the golf course. The Draft EIR analyzes the project's housing demand in Section 4.3 and growth-inducing impacts in Chapter 5.

Response to Comment 84-28

Comment Summary: The comment asserts that the loss of the golf course represents the likely loss of endangered, threatened, and rare wildlife or plant species (loss of individuals and/or occupied habitat).

.

Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign.

Response to Comment 84-29

Comment Summary: The comment states that the golf course lands north of JSB should be treated equally with golf course lands located south of JSB.

Refer to Master Response 7, Biological Impacts of Golf Course Redesign and Response to Comment 22-3. An equal level of analysis was performed for golf course lands located both north and south of JSB.

Response to Comment 84-30

Comment Summary: The comment states that the Draft EIR does not contain enough information about the specifics of proposed housing and academic development.

Because the Draft EIR is analyzing development expected to occur over a 10-year planning period, details of precise densities and locations of buildings are not available and not a component of the analysis for the program-level EIR. Stanford has not provided sizes and footprints of academic buildings. The purpose of this program-level environmental review is to consider the CP/GUP as a whole and to allow consideration of broad policy alternatives and mitigation measures at an earlier time when there may be more flexibility to address the issues. Consideration of the CP/GUP as a whole also allows better consideration of cumulative impacts that might not be clearly apparent in a project-level EIR. Each future building project would be subject to site-specific environmental review (Draft EIR page 1-3), which would evaluate the details of building size, footprint, and design to determine whether new or more severe impacts will occur.

Response to Comment 84-31

Comment Summary: The comment states that the Draft EIR should evaluate various alternatives requiring Stanford to house Stanford faculty and staff at the Stanford West Apartments, Stanford Senior Housing, Oak Creek Apartments, and should evaluate a variety of housing sites in San Mateo County.

The Draft EIR does in fact require that Stanford pursue off-campus housing opportunities. Mitigation Measure PH-3 on page 4.3-19 of the Draft EIR states that: "In conjunction with neighboring communities, Stanford shall continue to identify additional sites, on- and off-campus, that are suitable for housing development and could accommodate additional housing units over and above the number included in the project. Such sites should be developable within the time period covered by the project and be suitable for the types of housing that would address the current and future shortfall of faculty/staff and postgraduate housing."

Further, as a condition of approval for additional academic space, Stanford shall be required to construct housing prior to, or concurrently with, any increase in academic space. The commitment shall include 500 student and 175 hospital and postgraduate units within 2 years of GUP approval, 500 additional student units within 4 years of GUP approval, and 335 faculty and staff units within 6 years of GUP approval. This housing commitment shall be completed or

permitted by the time an additional 1,000,000 square feet of academic development occurs. For approval of academic development above 1,000,000 square feet, further increments of housing shall be required. Seventy-five percent of the GUP housing shall be constructed by the time a total of 1,500,000 square feet of academic development occurs, and 100 percent of the housing shall be completed by the time 2,000,000 square feet of academic development occurs. If additional academic development beyond 1,000,000 square feet is desired prior to year 6 of the GUP implementation, the housing commitment would need to be accelerated."

As can be seen from this mitigation, the County will require the construction of new housing before academic development can occur. The location of housing on the core-campus is preferred because it provides traffic benefits, would be used by Stanford students, faculty and staff, and can be regulated by Santa Clara County. Pursuit of off-campus housing options is to be in addition to, not instead of, the construction of new housing. This is deemed necessary given the extreme existing shortage of housing, as described in Section 4.3 of the Draft EIR.

Refer to Master Response 4, Alternative Housing Sites, for a discussion of housing alternatives within Santa Clara County.

COMMENT LETTER 85, CRAIG BREON, TOWN OF PORTOLA VALLEY, 8/7/00

Response to Comment 85-1

Comment Summary: The comment supports the Draft EIR alternative land use designation for the foothills (Open Space and Field Research) and states that the CP is inadequate since it does not provide guidance as to building intensity.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 10, Community Plan Description of Density and Intensity of Development. The Draft EIR evaluated the Open Space and Field Research designation in the alternatives chapter.

Response to Comment 85-2

Comment Summary: The comment supports alternative Academic Growth Boundary AGB-B, but suggests classifying the golf course as Campus Open Space, which would be consistent with the County's General Plan.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary; and Master Response 9, Additional Open Space Protection. Classification of the Golf Course as Campus Open Space has been identified as a component of the Environmentally Superior Alternative.

Response to Comment 85-3

Comment Summary: The comment states that the Draft EIR does not discuss the mechanisms that would help secure the open space in either the main campus or the foothills, and suggests that

.

easements should be considered that would be either permanent or cover a significant amount of time (i.e., 25 to 50 years).

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 85-4

Comment Summary: The comment requests consideration of alternatives that would cluster development north of Junipero Serra Boulevard.

Refer to Master Response 3, Intensified Development Alternative.

Response to Comment 85-5

Comment Summary: The comment states that the Draft EIR should identify and quantify the Reduce Project Alternative impact reductions to the greatest extent possible.

Refer to Master Response 2, Reduced Project Alternative.

Response to Comment 85-6

Comment Summary: The comment states that the Draft EIR should consider an alternative that reduces only the academic portion of the project leaving the housing as is. This would improve Stanford's job/housing imbalance.

Refer to Master Response 2, Reduced Project Alternative, which provides analysis of the suggested alternative.

Response to Comment 85-7

Comment Summary: The comment asserts that attention to biologic matters is weak including no field survey information for the Lathrop and golf course areas other than for California tiger salamander (CTS); proposed setbacks for California red-legged frog are at odds with USFWS recommended setbacks; and sensitive habitats (other than CTS habitat) on the main campus, such as small wetlands, are ignored.

Please refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign and Responses to Comments 66-11 through 66-13. A wetland survey will be required for each University project, including projects that may impact small wetlands on the main campus.

Regarding the issues of setbacks and buffers, the Draft EIR states in the discussion of Impact BIO-9 (page 4.8-40 of the Draft EIR) that 150-foot setbacks from the top of stream bank will be required. This is based on the County of Santa Clara General Plan. In the case of specific development proposals that could affect red-legged frog or steelhead, the County will determine appropriate setbacks and other project features in consultation with USFWS.

Response to Comment 85-8

Comment Summary: The comment states that traffic analyses should include commutative impacts of changes to the Stanford Research Park, ongoing and proposed. While the research park is in Palo Alto, it is under common ownership and thus traffic impact mitigation measures should be considered for both areas to reduce regional traffic impacts.

It is assumed that this comment intends to ask for inclusion of cumulative impacts in traffic analyses. The cumulative year 2010 traffic projections for the Draft EIR analysis were based on the best local and regional land use information available at the time of the project inception. This would include information regarding the research park. Traffic volume projections that may be done in the future would reflect the best available information at the time that they are done. The TDM measures that are part of mitigation measures TR-5B and TR-5C (starting on page 4.4-93 of the Draft EIR), could also benefit the research park and reduce its overall traffic generation. This would benefit both Stanford and the surrounding region.

Response to Comment 85-9

Comment Summary: The comment states that the Draft EIR should provide further consideration of water usage, and recommends water recycling.

The Draft EIR has identified increased water use as a significant impact (see pages 4.10-11 and 4.10-12 of the Draft EIR). Page 4.10-15 of the Draft EIR states that "use of lake water has the potential to affect the habitat of surface water resources if withdrawals increase to meet irrigation demands." Also refer to Response to Comment 87-8. Proposed mitigation is described on pages 4.10-14 and 4.10-15, in Mitigation Measures PS-1C, Water Conservation and Recycling. The Draft EIR recommends an aggressive program of water conservation and recycling as a mitigation measure for significant impacts. The recommended program is capable of keeping water consumption within Stanford's existing allocation and thereby avoiding impacts to creeks. However, the EIR also requires that Stanford address habitat impacts if there is any proposal to increase surface water withdrawals.

COMMENT LETTER 86, DEREK A. KANTAR, SANTA CLARA VALLEY TRANSPORTATION AUTHORITY, 8/7/00

Response to Comment 86-1

Comment Summary: The comment states that the Palo Alto Caltrain Center and Transit Center is currently at capacity and there is a multi-agency study to improve the facility and requests that the Draft EIR be revised to include financial participation in the improvement of the Palo Alto Caltrain Center.

The discussion of impact TR-1 on page 4.4-89 of the Draft EIR indicates that the project would add 11 AM peak hour transit trips and 21 PM peak hour transit trips. Some portion of these trips would use Caltrain as opposed to other forms of transit to get Stanford users from their homes to Palo Alto. These Caltrain riders would then transfer to local transit such as the Marguerite shuttle, SamTrans bus, or VTA bus to reach Stanford. The Stanford TDM program, discussed in

ċ

mitigation TR-5B on page 4.4-93 of the Draft EIR, could include Stanford's participation in any necessary pedestrian or bicycle improvements on a fair share basis. Also, mitigation TR-5C includes provisions for Stanford to be credited with improvements made to offsite transit facilities such as the Palo Alto Caltrain Center and Transit Center.

Response to Comment 86-2

Comment Summary: The comment requests that the intersection improvements mentioned in Tier 1 (TR-5A) be modified to include bus stop improvements where bus stops exist to improve transit operations.

The project impacts do not require mitigation upgrades of existing bus stops. However, any bus stops being rebuilt as part of the project or its mitigation measures, will be built to full VTA standards if possible. The Tier 1 improvement to the Arboretum Road/Palm Drive intersection would not affect any existing VTA routes as shown in Figure 4.4-2 on page 4.4-7 of the Draft EIR. The Tier 1 improvement to Welch Road/Campus Drive West intersection could affect both a VTA bus route and the Marguerite Shuttle. Addition of a westbound right turn lane at this location would improve transit operations through the intersection. The design of this improvement will incorporate improvements to any transit facilities physically affected by construction of the improvement.

Response to Comment 86-3

Comment Summary: The comment requests that the Draft EIR include a description of the improvements to the Line 22 Rapid Bus Corridor between the Palo Alto Caltrain Station and San Antonio Road, and examine any impacts of the project to the planned improvements.

VTA is in the process of making improvements to Line 22 in the form of queue jump lanes to make traveling by bus faster along El Camino Real. Some of the existing right-of-way will be used to construct the queue jump lanes. Therefore, if additional intersection improvements are added as part of Tier 2 improvements, these improvements will need to be made without encroaching into the area necessary for the queue jump lanes. A condition on the project will require that all intersection improvements consider the effect on queue jump lanes. Participation by Stanford in this effort could be proposed to the County as a cooperative trip reduction effort.

Response to Comment 86-4

Comment Summary: The comment requests that the Draft EIR include measures to limit demand for parking, such as restricting the ability of on-campus residents/students to obtain parking permits and minimizing the availability of parking close to campus. Both of these measures would reduce the traffic impacts associated with the provision of additional parking.

The TDM program discussed in mitigation TR-5B on page 4.4-93 of the Draft EIR, steps to pursue both of these measures. As discussed in the Responses to Comments 24-1, 35-1, and 52-12, limiting new parking to 2,267 spaces so as to maintain the current parking ratio of 1.03 spaces per student is one of the features of mitigation measure TR-5B which is intended to reduce project trips. Stanford has also instituted new policy of not allowing freshmen to park on campus will reduce the existing and long term parking demand for the campus. Additionally, as

discussed in the Responses to Comments 14-1, 14-7, 14-8, and 14-9, Stanford could be required to participate in establishing and maintaining residential permit parking programs initiated and administered by the jurisdictions controlling the neighborhoods around Stanford. By participating in such programs, Stanford would minimize the availability of parking close to campus, discourage the use of automobiles, and encourage the use of other modes of transportation.

COMMENT LETTER 87, WILLIAM C. SPRINGER, P.E., ASSOCIATE CIVIL ENGINEER, COMMUNITY PROJECTS REVIEW UNIT, SANTA CLARA VALLEY WATER DISTRICT, 8/7/00

Response to Comment 87-1

Comment Summary: The District recommends that a 72-hour 100-year storm event also be considered when evaluating mitigation for runoff and that information regarding estimated 72-hour 100-year storm flows in Matadero Creek is available in the District's Matadero Creek Engineer's Report.

Refer to Response to Comment 14-11, which specifies that the County should confer with the District before designing facilities to handle storm runoff. For clarification, the flow estimates in the Draft EIR are not intended to show how much estimated flow would be in Matadero Creek during a specific storm event. The purpose of the estimates is only to allow comparison of the estimated peak storm runoff that would be discharged to the Matadero Creek watershed from developed portions of the Stanford Campus under pre- and post-development conditions without storm water detention.

Response to Comment 87-2

Comment Summary: The comment states that as flood control agency for Santa Clara County, the District must review the design for the storm water detention facilities proposed by Stanford. The information reviewed shall include the supporting hydrologic and hydraulic calculations for 100-year and lesser frequency events, the inflow and outflow hydrographs, and the proposed detention basin maintenance and safety procedures.

Refer to Response to Comment 14-11. As noted therein, Santa Clara County approval is required prior to construction of proposed detention facilities by Stanford. As flood control agency for Santa Clara County, District review of the facilities, including the supporting hydrologic and hydraulic analyses, is already specified in the Draft EIR.

Response to Comment 87-3

Comment Summary: The comment states that detention basin design should consider storm and flooding events more frequent than a 100-year event.

Refer to Response to Comment 14-11.

Response to Comment 87-4

Comment Summary: The comment states that in mitigating flooding, measures should be considered to reduce flow from the storms that would occur more frequently than once every 100 years, whether by detention basins or other means.

Refer to Response to Comment 14-11.

Response to Comment 87-5

Comment Summary: The comment states that the District has had discussions with Stanford regarding the use of a 20-acre portion of the project (bounded by Foothill Expressway, Page Mill Road, Coyote Hill Road and Deer Creek) as off-stream storage and potential enhanced habitat for several endangered species. The District requests that Stanford not proceed with any other use for this property until the discussions between the agencies have been concluded.

The Stanford CP/GUP does not include the construction of any improvements within the 20-acre area identified by the District. If acceptable to Stanford and the County, the 20-acre site could be used to construct stormwater detention facilities for preventing downstream flooding and increases in post-development peak runoff. In its review of any proposed future development applications, the District would have the opportunity to comment regarding its interest in this site.

Response to Comment 87-6

Comment Summary: The comment states that watershed or subwatershed detention facilities may create opportunities for Stanford to partner with the District and the County of Santa Clara such as noted in Comment 87-5.

The County would cooperate with the District in evaluating opportunities for managing storm water. Refer to Response to Comment 87-5. However, given the topography of the area and location of the developed portions of the campus, it may not be feasible for a facility as proposed by the District to also serve the purpose of detention for increased stormwater from Stanford-related development.

Response to Comment 87-7

Comment Summary: The District suggests "appropriate site design" as an additional mitigation for HWQ-1.

Responses to this and several other comments regarding site design features have been addressed through revision of Mitigation Measure HWQ-1 Manage Stormwater Runoff in the Final EIR. Refer to Response to Comment 14-11.

Response to Comment 87-8

Comment Summary: The District notes that runoff to be used for recharge should be appropriate in quality to avoid pollution of the groundwater resource. The District must review the design for any proposed recharge basins.

As noted for existing Mitigation Measure HWQ-2, Santa Clara County approval is required prior to construction of proposed "replacement" recharge facilities by Stanford. As flood control agency for Santa Clara County, District review of the recharge facility design is already specified in the Draft EIR.

Responses to this and several other comments regarding groundwater recharge have also been addressed through revision of the Draft EIR to clarify mitigation measures as described below.

The Draft EIR is revised as follows:

Page 4.5-18, Mitigation Measure HWQ-2 Maintain Groundwater Recharge is revised to read:

HWQ-2: Maintain Groundwater Recharge

(a) Stanford shall prepare a site-specific groundwater recharge study for each project that is proposed to occur within the unconfined zone.

(b) Alternatively, Stanford could prepare a recharge study for development proposed to occur in all or a portion of the unconfined zone. The study or studies may be conducted in conjunction with hydrology and drainage studies as appropriate. The study shall identify the extent that new development will occur in the unconfined zone and the estimated average annual groundwater recharge that occurs in that area under pre-development conditions. Based on the results of this study, Stanford shall design, construct, and maintain facilities (e.g. shallow infiltration basins) that offset "lost" groundwater recharge by increasing recharge in other portions of the unconfined zone. The recharge facilities shall be designed to only temporarily store the storm water runoff and not create extended ponding that could result in mosquito breeding. Prior to construction, Santa Clara County shall approve the "replacement" groundwater recharge facilities. Storm drainage facilities that detain runoff within the project area may also serve as groundwater recharge facilities.

(c) So as to not pollute the groundwater resource, Best Management Practices and site design features shall be used to maintain the quality of storm runoff diverted by Stanford to groundwater recharge facilities shall be equal or better in quality to the runoff that would have recharged naturally at the developed site.

(d) In order to avoid overdraft of the groundwater basin during dry periods when Stanford's Hetch Hetchy allocation may be reduced, Stanford shall develop and implement a plan for responding to such a supply shortage. The plan shall include identification of conservation methods, and an evaluation of other potential sources of supply sources, including any treated water supply that may be soon available to Stanford through Santa Clara Valley Water District.

Response to Comment 87-9

Comment Summary: The District suggests that Stanford contact the District's Well Services section for assistance and information on locating and properly destroying abandoned wells.

Responses to this and several other comments regarding groundwater quality have been addressed through revision of Mitigation Measure HWQ-3 Protect Water Quality. Refer to Response to Comment 2-1.

Response to Comment 87-10

Comment Summary: The District notes that effective March 10, 2003, the NPDES permit requirements for discharges of storm water from construction sites will become effective for sites 1 acre or more in size and that irrespective of site size, construction site pollutants are not to be discharged to watercourses. In addition, the District notes construction sites of any size may not allow pollutants to enter or threaten to enter watercourses.

Responses to this and several other comments regarding stormwater quality impacts from construction sites smaller than 5 acres have been addressed through revision of Mitigation Measure HWQ-3 Protect Water Quality in the Final EIR. Refer to Response to Comment 2-1.

Response to Comment 87-11

Comment Summary: The District notes that the monthly construction site best management practices (BMP) reviews noted in the Draft EIR, are no substitute for BMP monitoring before and during storm events.

BMP monitoring before and during storm events is important for evaluating BMP effectiveness. Responses to this and several other comments regarding surface water quality have been addressed through revision of HWQ-4 Best Management Practices for Preventing Post-Construction Urban Runoff Pollution. Refer to Response to Comment 2-1.

Response to Comment 87-12

Comment Summary: The District notes that post-construction controls and best management practices can also be used to protect groundwater quality.

Responses to this and several other comments regarding protection of groundwater quality have been addressed through revision of Mitigation Measure HWQ-3 Protect Water Quality in the Final EIR. Refer to Responses to Comments 2-1 and 87-8.

Response to Comment 87-13

Comment Summary: The District notes that recycled water use in areas which overlay the unconfined zone, may require monitoring of impacts on groundwater quality.

Any project providing recycled water to Stanford would be subject to further environmental review to determine the presence of new or increased project-specific significant impacts which would address water quality concerns associated with the use of recycled water.

Response to Comment 87-14

Comment Summary: The District expresses concern that, during dry periods when the Hetch Hetchy system supply may not be available, groundwater extractions by Stanford for potable or irrigation use could result in overdrafting. However, during those periods, the District may soon be able to provide Stanford with an alternative treated water supply.

Stanford's existing Hetch Hetchy system water supply is described in section 4.10.A.5 in the Draft EIR. Refer to Response to Comment 87-8, which includes additional measures in Mitigation Measure HWQ-2 to protect the groundwater resources from overdrafting.

Response to Comment 87-15

Comment Summary: The comment requests that buffer widths and management plans for buffers be defined and disclosed.

Requirements for buffers around riparian areas are defined and disclosed in the General Plan for Santa Clara County. As noted on page 4.8-40 of the Draft EIR, "all USGS blue line streams in the project area will be required to have a 150-foot setback from the top of streambank, except as reduced in urban areas through the General Plan." At this time, the only foreseeable disturbance in these areas would be associated with the golf course realignment. Refer to Master Response 7, Biological Impacts of Golf Course Redesign for discussions of these potential impacts. As applications for each Stanford project are submitted, the Santa Clara Valley Water District will be apprised of whether Stanford proposes to do work in the riparian and stream corridors managed by the District using the District's own application process, which Stanford will follow. The SCVWD has the legal authority to regulate construction activities within 50 feet of most managed streams in the County of Santa Clara, including San Francisquito Creek.

Response to Comment 87-16

Comment Summary: The comment supports Option 2: the Alternative Mitigation Program for California tiger salamander and notes that the applicant is not proposing Option 2.

This option is identified in the Draft EIR. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 87-17

Comment Summary: Stanford must obtain a permit from the District prior to any construction, demolition, grading, or landscaping proposed within 50 feet from the top of a bank of a District watercourse.

Responses to this and several other comments regarding construction impacts have been addressed through revision of Mitigation Measure HWQ-3 Protect Water Quality in the Final EIR. Refer to Responses to Comments 2-1 and 87-15.

COMMENT LETTER 88, PRIA GRAVES, 8/7/00

Response to Comment 88-1

Comment Summary: The comment requests that possible remains of the Palo Alto Airport be evaluated for cultural resource significance in the EIR.

When specific development projects are proposed under the GUP, compliance with mitigation measures HA-1: Protection of Historic Resources, and HA-2: Protection of Known and Previously Undiscovered Archaeological Resources, will ensure that if remains of the Palo Alto Airport are identified during or prior to construction activities, these remains will be evaluated for historical significance by a qualified archaeologist and determinations of eligibility will be made.

Response to Comment 88-2

Comment Summary: The comment asks why consultants found no evidence of the Palo Alto Airport during their research.

A comprehensive inventory of known cultural resources (historic structures and archaeological sites) on Stanford lands is maintained and updated annually by the Campus Archaeologist. No other inventories or databases are known to have a comparable level of completeness, including the records on file at the Northwest Information Center of the California Historical Resources Information System (Laura Jones, pers. comm. 8/1999). A review of Stanford University's cultural resources inventory (part of the University's geographic information system database maintained by the Architect/Planning Office) was conducted for the following resources:

- historic standing structures on Stanford lands
- historic areas on Stanford lands
- prehistoric archaeological sites

Currently there are no known sites or structures in the vicinity of Escondido Village (located southwest of the intersection of El Camino and Stanford Avenue) that would relate to the remains of the Palo Alto Airport.

COMMENT LETTER 89, DAN KALB, DIRECTOR, SIERRA CLUB, LOMA PRIETA CHAPTER, 8/7/00

Response to Comment 89-1

Comment Summary: The comment states that the Draft EIR should discuss loss of open space with the distinction between undeveloped and developed open space.

The open space lands potentially affected by the project are all considered developed open space with the exception of the foothills and a portion of the Lathrop District. Its partially for this reason that the Draft EIR recognizes land uses changes proposed for the Lathrop District as significant in regards to open space (see page 4.2-20). Alternative land use (LU-A) and Academic Growth Boundary (AGB-A) components are recommended in the Environmentally Superior Alternative that would reduce the significant impacts to a less than significant level. Also refer to Master Response 9, Additional Open Space Protection.

Response to Comment 89-2

Comment Summary: The comment states new development should not be allowed west [south] of JSB and that the County should insist that Stanford's Plan be entirely consistent with the letter and spirit of the City of Palo Alto's Urban Growth Boundary. The comment also states that the open space impacts in the Lathrop District are avoidable, and that the County should use its zoning authority both to promote alternatives that keep future growth within the core campus area, and, if necessary, to require more substantial mitigation to make the impacts less than significant.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary and Master Response 9, Additional Open Space Protection.

As the Draft EIR describes, the significant and unavoidable impact on open space in the Lathrop District results not from clustered development in that location, but from the change in land use designation which could allow for intensive development beyond the GUP period.

Alternative land use (LU-A) and Academic Growth Boundary (AGB-A) components are recommended in the Environmentally Superior Alternative that would reduce the significant impacts to a less than significant level.

Response to Comment 89-3

Comment Summary: The comment states that the Draft EIR falls short of identifying realistic mitigation measures to reduce the Plan's significant impact on open space in the foothills.

The Draft EIR proposes alternatives to the CP/GUP that would protect the open space lands south of JSB. Also refer to Master Response 9, Additional Open Space Protection and Responses to Comments 22-3 and 89-2.

Response to Comment 89-4

Comment Summary: The comment states that the Draft EIR points out that "...the addition of trips for the project scenarios with and without the arena and theater, when added to background 2010 conditions, would affect impacts along five intersections in the City of Palo Alto, eight in the City of Menlo Park, two in Stanford, and two (others) in Santa Clara County."

The Draft EIR provides mitigation measures for the identified impact on pages 4.4-92 through 4.4-104.

•

Response to Comment 89-5

Comment Summary: The comment states that the Draft EIR correctly asserts that despite attempts at proposed mitigation, automobile trips will significantly increase and urges the County to support an alternative that does not increase traffic congestion.

It should be noted that the Draft EIR does not assert that "despite attempts at proposed mitigation, automobile trips will significantly increase." Mitigation TR-5D on page 4.4-97 states that "Tier 2 intersection improvements would only be required if trip reduction and monitoring determines that Stanford commute trips are increasing." Mitigation measure TR-5B as discussed on page 4.4-93 has a goal of "no net new commute trips". This would use TDM measures to reduce the number of existing and future automobile trips. As discussed on page 4.4-104, the County cannot require Stanford to implement TDM for employee trips and cannot guarantee that intersections in other jurisdictions will be modified. Therefore, the significant transportation impacts are considered significant and unavoidable.

Response to Comment 89-6

Comment Summary: The comment states that traffic congestion is a primary cause of air pollution. Only projects that improve, or at the very least do not deteriorate air quality levels, should be allowed to go forward.

The Draft EIR addresses air quality impacts at specific locations within the study area. The land use goals of the project are consistent with efforts to improve regional air quality through compatible land use planning. By providing on-campus housing and allowing campus users to move from their existing off-campus locations to on-campus housing, Stanford would reduce overall commute distances, and the reliance on automobile use. The "no net new commute trips" goal would further assist these efforts. Anything that reduces the length and proportion of automobile trips has the potential to reduce congestion and improve regional air quality.

Response to Comment 89-7

Comment Summary: The comment disagrees that California tiger salamander will be saved from significant impact with the use of Stanfords artificial mitigation breeding ponds; and, disagrees that Stanford's mitigation proposals (Option 1) will fully mitigate impacts to California tiger salamander.

The Draft EIR explains that the mitigation proposed by Stanford for the CTS would not reduce impacts to less than significant. An alternative mitigation program for California tiger salamander (Option 2) is proposed in the EIR on pages 4.8-32 through 4.8-33. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 89-8

Comment Summary: The comment asserts that existing Special Conservation Areas at Stanford are not large enough to protect important species habitat and urges the County to undertake environmentally thorough studies to support this assertion.

Alternative Component LU-E is included in the Draft EIR specifically to provide an option for the County to implement the program described in the comment. This component recognizes that the County may identify additional or other lands for Special Conservation. The County has determined that no impacts identified in the EIR warrant expansion of these areas.

Response to Comment 89-9

Comment Summary: The comment urges the County to fully protect threatened and endangered native plant species indigenous to undeveloped or minimally developed areas, despite the fact that CDFG may allow takings.

Mitigation measures included in the EIR are intended to provide protection for special-status species at Stanford. Also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 89-10

Comment Summary: The comment states that the Draft EIR does not address cumulative impacts on air quality resulting from the increased traffic in the Stanford/Mid-Peninsula area.

Air quality impacts were based upon the traffic analysis. Intersections that were forecast to operate at Level of Services F in the morning or afternoon (or both) were selected for analysis. The traffic data were based on the "year 2010 with project" traffic volumes as projected by the Santa Clara County Center for Urban Analysis travel demand model. The model includes projected increases in traffic throughout the project area. The air quality analysis therefore does consider cumulative increases in traffic. Further, as identified on page 4.11-13 of the Draft EIR, the project is consistent with all applicable air quality plans relevant to the Bay Area.

Response to Comment 89-11

Comment Summary: The comment states that the Draft EIR does not contain an analysis of whether the technology exists to eliminate particulates from diesel exhaust. The comment inquires about monitoring and enforcement of mitigation and the effects of back-up generators.

With regard to construction emissions, including construction vehicle exhaust, the project is required to implement mitigation measures as listed in the Draft EIR (page 4.11-10). BAAQMD, in their CEQA guidelines state that so long as the listed mitigation measures are implemented, construction air quality impacts are mitigated to less than significance. The County will adopt a mitigation monitoring program that will ensure compliance with required air quality mitigation measures. Emergency generators are typically permitted to operate a maximum of 200 hours per year. Actual operation for routine testing is usually less than 25 hours per year (1/2 hour per week).

Response to Comment 89-12

Comment Summary: The comment states that the County should study an Academic Growth Boundary consistent with Palo Alto's Urban Growth Boundary.

1.00

Refer to Master Response 2, Reduced Project Alternative; Master Response 3, Intensified Development Alternative; and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 89-13

Comment Summary: The comment states that Stanford should not be allowed to develop beyond Palo Alto's urban growth boundary.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 89-14

Comment Summary: The comment requests further study of a reduced project alternative, and states that the Environmentally Superior Alternative should include reduced project size.

Refer to Master Response 2, Reduced Project Alternative. It has been determined that restrictions on development areas, additional protection of open space, and changes in land use designations provide the best mechanism for reducing or eliminating potentially significant environmental impacts.

Response to Comment 89-15

Comment Summary: The comment states that the EIR should analyze what planning tools are available to permanently protect the foothills. Restrictive zoning, clustered development, developer agreements, and the use of conservation easements can be used to protect the foothills completely from future development.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 89-16

Comment Summary: The comment states that the Draft EIR lacks the level of specificity required for decisionmakers to make an informed decision.

Because the Draft EIR is analyzing development expected to occur over a 10-year planning period, details of precise densities and locations of buildings are not available. The purpose of this program-level environmental review is to consider the CP/GUP as a whole and to allow consideration of broad policy alternatives and mitigation measures at an earlier time when there may be more flexibility to address the issues. Consideration of the CP/GUP as a whole also allows better consideration of cumulative impacts that might not be clearly apparent in a project-level EIR. Each future building project would be subject to environmental review, which would evaluate the details of building size, footprint, and design.

Response to Comment 89-17

Comment Summary: The comment states that the project is not consistent with Palo Alto Policy L-1 and requests further analysis.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary. Palo Alto policy L-1 deals primarily with the City's Urban Service Area Boundary. Stanford is exempt from policies regarding Palo Alto's Urban Service Boundary.

Response to Comment 89-18

Comment Summary: The comment states that "the Draft EIR correctly points out that Stanford's Plan is growth inducing".

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 89-19

Comment Summary: The comment requests study of development performance measures and suggests that building should be higher density.

Refer to Master Response 3, Intensified Development Alternative.

Response to Comment 89-20

Comment Summary: The comment suggests that the County should insist on mitigation of unavoidable adverse effects on open space, traffic, historic resources, construction noise and growth inducement.

The Draft EIR has determined that with designation of the Lathrop Development District as Academic Campus, impacts to open space would remain significant and unavoidable. The Draft EIR explains that revising the Academic Growth Boundary to exclude new development in the undeveloped portions of the Lathrop Development District would reduce this impact to less than significant.

The Draft EIR has proposed extensive traffic mitigation, including intersection improvements and trip reduction measures. As noted on page 4.4-104 of the Draft EIR: "There are three reasons that the County cannot guarantee the effectiveness of the program. First, Stanford may only be required to make their fair-share contribution to the improvement, and there is no guarantee that the remaining funds for the improvement would be available. Second, many of the intersections are located in other jurisdictions, who may or may not choose to implement the recommended improvements. Third, the County is constrained by statutory limitations regarding the use of employee trip reduction measures. Therefore, although it is likely that intersection impacts would be adequately mitigated for GUP related traffic, this impact is considered to be significant and unavoidable."

For historic resources the success of mitigation measures cannot be guaranteed because it is unknown which historic resources might be affected by future development projects. The Draft ÷.,

EIR (page 4.9-11) has determined that "Although all feasible mitigation measures would be required for such projects, it is not possible at this time to determine whether the measures would reduce the impacts to less than significant levels because the evaluation of impacts to historic resources and corresponding mitigation is inherently site specific." Therefore, the impact is considered to be significant and unavoidable.

Construction noise is also an unavoidable impact of development, and even with implementation of all feasible mitigation measures this impact can not be eliminated.

Page 5-7 of the Draft EIR recommends that "The University shall work with Santa Clara County and the City of Palo Alto to develop and implement appropriate traffic, public services/utilities, and other related mitigation measures to address growth-inducing impacts of the Stanford CP/GUP." However, this measure cannot guarantee that the indirect impacts will be mitigated to a less than significant level because the mitigation of housing and traffic effects associated with indirect employment generation are not within either the County or Stanford's control.

COMMENT LETTER 90, R. DENNIS REINHARDT, 8/7/00

Response to Comment 90-1

Comment Summary: The comment states that the Draft EIR lacks an infill design alternative, and requests that the County deny the GUP application and issue a moratorium on submission of a revised application.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 3, Intensified Development Alternative.

Response to Comment 90-2

Comment Summary: The comment states that the GUP application was timed to gain approval before the impacts of the Sand Hill Road project were apparent to the public.

Refer to Master Response 1, Statement for or Against the Project or Project Components. The analysis of impacts of the GUP included consideration of the Sand Hill Road project as part of the cumulative development scenario.

Response to Comment 90-3

Comment Summary: The comment states that growth at Stanford is affecting surrounding communities, and that Stanford should increase density of development rather than increase sprawl.

The Draft EIR has evaluated the effects of increased development at Stanford on surrounding communities. Refer to Master Response 3, Intensified Development Alternative.

Response to Comment 90-4

Comment Summary: The comment reiterates the request that the County deny the GUP application and issue a moratorium on submission of a revised application.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 90-5

Comment Summary: The comment lays out a proposal for higher density redesign of the proposed GUP development, including development of the Arboretum, preservation of open space south of Junipero Serra Boulevard, and avoidance of development on the golf course.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; Master Response 4, Alternative Housing Sites and Master Response 9, Additional Open Space Protection.

COMMENT LETTER 91, DONALD A. PHILLIPS, ED.D., SUPERINTENDENT OF SCHOOLS, PALO ALTO UNIFIED SCHOOL DISTRICT, 8/7/00

Response to Comment 91-1

Comment Summary: The information contained in Table 4.10-1 is the enrollment projection and capacity figures for the year 2003, assuming completion of the District's Building for Excellence Program, rather than the year 2000, as identified in the Draft EIR.

The 2000 enrollment projections and school capacity figures were obtained from the PAUSD web site and by contacting an official of the School District. If the School District has different information for 2000 enrollment and school capacity by grade level that it can provide to the County, these new data will be incorporated into the evaluation of current school capacity surplus or deficit.

Response to Comment 91-2

Comment Summary: The reference to the Lapkoff and Gobalet study on page 4.10-16 should be September 28, 1999, not September 2, 1999.

The Draft EIR has been revised as follows:

Page 4.10-16. The first sentence in the fifth paragraph is revised to read:

Based on a 1999 study prepared for the PAUSD by Lapkoff and Gobalet Demographic Research, Inc. (September 2 28, 1999), the estimated ...

Response to Comment 91-3

Comment Summary: The last partial paragraph on page 4.10-17 contains incorrect enrollment numbers.

The Draft EIR has been revised as follows:

Page 4.10-17. The last paragraph is revised to read:

Projected enrollment through 2010 <u>under the District's Medium forecast</u> is 4,2005.082 for elementary schools, 2,258 2.680 for middle schools, and 3,346 4.202 for high schools, or 9,804 11.985 students total. Total enrollment in 2010 is projected to be about the same as total enrollment in the 1999-2000 academic year, but with fewer elementary and middle school children and more high school children. Enrollment is expected to peak between 2003 2010 and 2007 2011. The addition of 239 to 584 students from planned University housing will increase total enrollment by 2.4 to 6.0 4.9 percent by 2010. Enrollment projections were prepared before the University's draft CP and GUP application were released.

Response to Comment 91-4

Comment Summary: With the increase in new graduate student housing this will free up Palo Alto's housing and make room for potential occupancy by some families with school-age children. To estimate this likelihood a data resource such as the addresses of current graduate students living in Palo Alto would help.

It would be speculative to attempt to analyze the secondary effects of individuals moving onto campus being replaced by families with children.

Response to Comment 91-5

Comment Summary: The comment refers to page 4.10-16 of the Draft EIR that says an EIR need not consider the impacts of the Project on a school district's ability to accommodate enrollment as an environmental effect under CEQA. The comment disagrees with the Draft EIR's assessment of school impact fees per CEQA.

The Draft EIR acknowledges that additional school construction may occur as a result of the project and that this construction may cause environmental impacts. The Draft EIR also explains that analysis of these impacts at this time is too speculative; however, the impacts would be analyzed in detail by the PAUSD when a particular site and development plan were identified. (Please see page 4.10-18 of the Draft EIR for discussion of additional school construction).

Note: On September 15, 2000, the PAUSD submitted a follow-up letter to the County. The letter states that "PAUSD and Stanford have reached an agreement that mitigates in full the impacts of the General Use Permit on PAUSD. Therefore, PAUSD withdraws the August 7th letter." The September 15, 2000 letter is included in the appendix as Letter 128.

The Draft EIR has been revised as follows:

Page 4.10-18. Mitigation measure PS-2 is revised to read:

Mitigation: **PS-2: Payment of Statutory School Impact Fees**

By law, the only mitigation of school impacts that the County can require is payment of statutory school impacts fees. In this case, however, Stanford University and the PAUSD have been working together to arrive at an agreement whereby Stanford would provide money or land to the school district. The impact will be mitigated to a less than significant level through imposition of statutory school fees. Performance of the terms of an agreement between Stanford and the PAUSD in which Stanford provides money, property, or other consideration to the PAUSD in an amount that the PAUSD deems equal to or more than the value of the statutory school fees, may also occur. If the money or land that Stanford provides to the PAUSD through the agreement is meant to replace the statutory school fees, such intention shall be clearly articulated in the agreement. Otherwise, the County will continue to refer all building permit applications to the PAUSD for payment of school fees at the time of permit issuance.

Response to Comment 91-6

Comment Summary: The Draft EIR states that the agreement currently being contemplated between Stanford and the PAUSD, which requires Stanford to provide PAUSD with either land for a new school or funds for the construction of a new middle school will mitigate any impacts from increased enrollment to less the significant. If the impact fees do not fully cover the cost of any facilities necessary to meet increased enrollment, the impact is still considered significant. The Draft EIR does not provide sufficient information to determine if the impact fees mitigate the impacts to a level of insignificance since no analysis is provided.

State law provides that the statutory school impacts fees "are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property . . . on the provision of adequate school facilities." (Government Code Section 65995(h); see also Section 65996(b)). In light of this statutory directive, the County does not have the authority to find the project's school facilities impacts to be significant and unmitigated.

Note: On September 15, 2000, the PAUSD submitted a follow-up letter to the County. The letter states that "PAUSD and Stanford have reached an agreement that mitigates in full the impacts of the General Use Permit on PAUSD. Therefore, PAUSD withdraws the August 7th letter." The September 15, 2000 letter is included in the appendix as Letter 128.

Response to Comment 91-7

Comment Summary: In determining whether the impact fees mitigate the school impacts to a less than significant level, the fact that Stanford's student housing is generally being exempted from property taxes also must be considered.

Refer to Response to Comment 91-6.

COMMENT LETTER 92, JAMES SWEENEY, PRESIDENT, STANFORD CAMPUS RESIDENTIAL LEASEHOLDER, INC., 8/7/00

Response to Comment 92-1

έ.

Comment Summary: The comment states that bicycle and pedestrian travel ways may well be impacted by the project as follows: 1) Intersection enlargements may make bicycle and pedestrian travel less attractive and more hazardous. 2) Heavy construction may create an extremely hostile environment for bicyclists or pedestrians to share the road. 3) Increased road capacity may encourage more traffic and more speeding at non-peak hours, increasing danger for bicyclists. The final EIR should evaluate these impacts and include appropriate mitigation measures, such as accelerated implementation of traffic calming measures, with fair share funding contributed by the applicant, and meaningful enforcement of truck routes.

If it becomes necessary to implement Tier 2 intersection improvements, the design of such improvements would incorporate features to maintain or improve safety and comfort of the intersection for pedestrians and bicyclists. Mitigation measures TR-7B and TR-7C on page 4.4-108 of the Draft EIR specify that any construction project will require submittal and approval of specific construction management plans to mitigate the specific impacts of each project with regards to Pedestrians and bicyclists. Stanford Avenue and the portion of Junipero Serra Boulevard between Campus Drive East and Page Mill Road are not part of the truck routes depicted in Figure 4.4-17 on page 4.4-110 of the Draft EIR, and should carry no construction equipment except for projects physically located on those streets. Mitigation TR-5B is intended to reduce project generated traffic volumes and achieve "no net new commute trips" rather than to increase roadway capacity. In order to meet this goal, the TDM program may involve steps to support bicycle riders and pedestrians.

Response to Comment 92-2

Comment Summary: The comment states that a policy of residential parking permits for onstreet parking in Stanford's internal, residential neighborhoods should be required to be continued.

The program identified is an internal effort by Stanford to prevent commuters from parking on its internal residential streets. Additionally, as discussed in the Responses to Comments 14-1, 14-4, 14-5, 14-6, and 86-4, Stanford may be required to participate in establishing and maintaining residential permit parking programs initiated and administered by the cities or jurisdictions controlling the neighborhoods around Stanford. Participation in such programs, would minimize the availability of parking close to campus, discourage the use of automobiles, and encourage the use of other modes of transportation. Also refer to Responses to Comments 14-7 and 14-9.

Response to Comment 92-3

Comment Summary: The comment states that measures to improve bicycle and pedestrian safety on the County Roads bounding core campus are needed to support use of these designated routes (Fig. 4.4-3).

As indicated in mitigation measure TR-5B and the Response to Comment 92-1, the Stanford TDM program could include steps to increase bicycle and pedestrian usage through improvements in safety and convenience of these facilities.

Response to Comment 92-4

Comment Summary: The comment states that it has been suggested that the County revise Tier 2 mitigation measures to allow for consideration and implementation of alternative designs. Evaluation of alternatives would include analyses of capacity, aesthetics, and safety for bicyclists and pedestrians as well as vehicles. Cost analyses should include operating costs as well as construction cost. These analyses should be conducted at the time the requirements are triggered.

This is a good suggestion. As indicated in the Responses to Comments 54-2 and 65-2, and discussion of mitigation measure TR-5D on page 4.4-98, the jurisdiction receiving Stanford's funds may choose to use those funds for the designated intersection modifications or for trip reduction measures that benefit the intersection in question. To provide for greater flexibility, the text will be changed.

The Draft EIR is revised as follows:

Page 4.4-98, the second sentence in the first full paragraph is revised to read:

The jurisdiction may choose to use funds that Stanford contributes for the intersection modifications, or for trip reduction measures that benefit the intersection in question, or for equally or more effective alternate mitigation measures that may be available at the time that the mitigation measures are triggered.

Response to Comment 92-5

Comment Summary: The comment states that the Draft EIR fails to address cut through traffic impacts to residential neighborhoods on campus. The mitigation wording should be revised to support a mechanism for Campus residents to initiate the same study and remedy process through the County Planning Office, or whatever replaces it in the Final EIR.

With the exception of Junipero Serra Boulevard and Stanford Avenue, streets in the faculty/staff residential neighborhoods are privately maintained and are therefore not under the jurisdiction of the County to control or improve. The County may require Stanford participation in traffic studies along these roadways.

Response to Comment 92-6

Comment Summary: The comment states that the 10-year span of the permit and the scale of the project suggests that the campus will be in construction mode for a substantial fraction of the coming decade, making construction traffic a sensitive issue with campus residents and neighbors alike.

.

The construction of projects incorporated into the Draft EIR would be a series of separate projects occurring on different parts of Stanford land. Each project would have a construction management plan to reduce or mitigate its impacts. Given the distribution of projects, it is not likely that any specific part of the campus residential community would experience significant construction traffic impacts for more than a limited duration.

Response to Comment 92-7

Comment Summary: The comment states that as a technical correction, Fig 4.4-17 reflects County-adopted trucking routes (for the County roads in the area), in addition to the stated Palo Alto and Menlo Park Routes. A dedicated truck route enforcement program of 20 hours per week is requested, from ground breaking of any construction under this GUP through completion of the construction.

The text of Mitigation TR-7E will be adjusted.

The Draft EIR is revised as follows:

Page 4.4-109, the fourth paragraph is revised to read:

Stanford shall be required to deliver and remove all construction-related equipment and materials on truck routes designated by <u>Santa Clara County</u>, and the Cities of Palo Alto and Menlo Park....

In order to enforce the truck route policy, it is recommended that the County require Stanford to include in its construction contracts a clause requiring the contractor and its sub contractors to follow the truck route policy as defined by the construction management plan for each project. The contract clause would also stipulate a penalty or fine for each infraction involving use of non-truck route streets by trucks associated with the project. The construction management plan for each project would also identify the mechanism by which infractions would be observed or reported. Also refer to Response to Comment 14-10.

Response to Comment 92-8

Comment Summary: The comment states that construction impact mitigation plans to be described by the applicant and approved by the County are suggested to include implementation/enforcement measures as well as plans and policy statements.

As indicated in the Response to Comment 92-7, it is recommended that the County require Stanford to include in its construction contracts a clause requiring the contractor and its sub contractors to follow the plans and policy statements described in the Construction Impact Mitigation Plan. Also refer to Response to Comment 14-5.

Response to Comment 92-9

Comment Summary: The comment states that previous noise mitigation has had limited success.

The noise monitoring results confirm that the existing noise levels are lower than the impact limit of 66 dBA. The traffic noise would remain below 66 dBA before or after the completion of GUP development; therefore, the construction of a soundwall is not deemed necessary.

Response to Comment 92-10

Comment Summary: The comment states that there is an existing safety problem on the residential portion of Junipero Serra Boulevard.

These concerns address existing conditions rather than impacts of the proposed project. The County may address these issues through the conditions of the General Use Permit or the Community Plan.

Response to Comment 92-11

Comment Summary: The comment states that it is now possible to improve conditions on Junipero Serra Boulevard and Stanford Avenue using traffic calming measures. County Roads recently engaged a consultant who recommended proceeding in that direction, a recommendation previously supported by Stanford's consultant Fehr & Peers.

Refer to Response to Comment 92-10.

Response to Comment 92-12

Comment Summary: The comment asks that the County establish as a permit condition of the GUP that funding and an accelerated timetable be specified for correcting specific safety issues already identified and documented in engineering analyses of the residential portion of Junipero Serra Boulevard and Stanford Avenue within the County jurisdiction.

Refer to Response to Comment 92-10.

Response to Comment 92-13

Comment Summary: The comment states that evaluation of conceptual designs indicates these goals can be accomplished without loss to the carrying capacity of the road and without damage to the aesthetic quality of this County Scenic Road. Public comment on the Permit Application and the Draft EIR has made it clear that the aesthetics of this area are particularly sensitive. JSB serves as the interface between the developed campus and the pristine open space of the foothills, and it is a major recreational route for bicyclists, joggers, and hikers headed for the foothills.

Any studies of Junipero Serra Boulevard performed as a result of this project and its conditions of approval would provide mitigation measures designed to balance and maintain or improve the safety, utility, and aesthetic quality of Junipero Serra Boulevard for all of its users and neighbors. Also refer to Response to Comment 92-5.

Response to Comment 92-14

Comment Summary: The comment states that mitigation proposed for recreational impacts may not be sufficient because there is no timetable for improvement of the neighborhood parks, nor for the dedication of trails, nor for improvements to the trails. The comment also states that the Draft EIR fails to analyze the potential negative effects of the trails on campus residents.

Refer to Response to Comment 1-3. The implementation issues will be addressed in the specific GUP conditions. The County Trails Master Plan includes a Design Guidelines Report that outlines how the trails shall be developed. This document would be used to guide in the dedication of the trail easements and the eventual improvement of the trails by the County. The trails indicated on the County Trails Master Plan are located at a considerable distance from the existing faculty/staff residential neighborhood and are not expected to affect neighborhood residents.

Response to Comment 92-15

Comment Summary: The comment states that mitigation proposed for recreational impacts may not be sufficient because there are many unanswered questions concerning the improvement of parks.

Requirements for park and trail improvements will be enforced through the Community Plan and conditions of approval of the General Use Permit. The County may require that park improvements be designed in consultation with the residents or the Stanford Campus Residential Leaseholders. Some questions raised by the comment are outside the authority of the County to determine, such as the source for funding park improvements and maintenance.

Response to Comment 92-16

Comment Summary: The comment states that the Draft EIR fails to address changes to views from campus residences, including 13 homes along JSB with formerly private gardens backing directly to a segment of the route Stanford expects to include in the public route in the foothills, and other campus homes directly adjoining the foothills access parking area along Stanford Avenue.

The CP/GUP does not propose any changes in land use or development that would affect views from the backyards of homes along JSB or the homes along Stanford Avenue near JSB. These trail routes are currently used extensively by the public. Changes identified in the comment are not included in the project. Stanford's policy for access to the Dish is not part of the CP/GUP. Increased population from implementation of the CP/GUP may result in increased use of trails located adjacent to the homes along JSB. However, increased use of these trails is not considered a visual impact based upon the evaluation criteria.

Response to Comment 92-17

Comment Summary: The comment states that cumulative impacts to recreational resources will not be adequately mitigated by measures proposed in the Draft EIR.

Refer to Responses to Comments 92-14 and 92-15.

Response to Comment 92-18

Comment Summary: The comment states that cumulative impacts to foreground views from private residences will not be adequately mitigated by measures proposed in the Draft EIR.

Refer to Response to Comment 92-16.

Response to Comment 92-19

Comment Summary: The comment states that the faculty/staff household population on campus might have been underestimated in the Draft EIR.

The geographic area comprising the Stanford CDP as reported by the U.S. Census in 1990 is not the same geographic area comprising the campus residential population in 1999 or 2000. Comparable data are not available on which to make a direct geographic comparison between 1990 Census data and University data on the campus resident population.

The Draft EIR is revised as follows.

Pages 4.3.2 and 4.3.3. The second footnote to Table 4.3-7 has been amended as follows:

Comparable information was not available for 2000 regarding the total number of residents on the Stanford campus. Stanford University reported in its GUP Annual Report #11 that 9,354 students resided on campus in undergraduate and graduate student housing (some possibly with spouses and/or children, although the exact number is unknown and Stanford was unable to provide an exact count). According to housing facts on the University's web site, about 9,100 students resided on campus in 1997-98, of which 8,300 were single, 440 were couples without children, and 360 were parents with children. The Census Bureau reported that families with children in the Stanford CDP had an average of 1.7 children per household. The CDP includes faculty housing, so the actual ratio of children per households for student families might be different. No information is available for student families only, however Assuming the same percentage of couples, students with children, and the number of children per household, and applying those rates to the 9,354 student population reported by the University for the year 2,000, the following estimate of students, spouses/partners, and children is developed:

9,354 total students, of which:

8,532 are single students (undergraduates and graduate students)

452 are students with 452 spouses/domestic partners

370 are students with 629 children

Total estimated student/family population for 2000 is: 10,435

There were also 989 faculty/staff housing units in 2000. Assuming a 0.3% vacancy rate for these units (the rate reported by the Census Bureau in 1990) and an average household size of 1.95 (as reported by the Census Bureau in 1990), another 1,923 individuals would reside in these dwelling units. According to the 1990 Census, about 15 percent of households in the Stanford CDP had children (excluding students living in group quarters, which do not constitute households). A 1992 Stanford Campus Residential Leaseholder's Survey (SCRL) and a more recent Emergency Plan estimate that about 2.600 individuals live in the 989 faculty/staff housing units, or 2.62 persons per household. California Department of Finance estimates for Palo Alto and Menlo Park show an average household size or approximately 2.4, which would yield a population of 2.373 persons. This same survey found that 20% of faculty/staff households have children.

The total campus residential population, based on these assumptions, would be 10,435 + 1,923, or 12,358 total campus residents. If the SCRL assumptions are used, the total campus population is estimated to be 13,035. Total campus ADULT population is estimated to be 12,358, less 629 children in student housing, less 252 children in faculty/staff housing, or 11,477. If the SCRL assumptions are used, there could be as many as 488 K-12 school-

aged children, 236 more than using the 1990 Census as the basis for population assumptions. The estimated ADULT population would be 11,918 under the higher, SCRL survey assumption. This number is similar (139 more adult residents) to the assumption included in Table 4.4-18 of Section 4.4, Traffic and Circulation.

However, the Census is generally accepted as the most reliable survey of population is most communities. A comparison of 1990 and 2000 Census data, which was not available at the time of the preparing the EIR, would help clarify the probable number of residents living in faculty/staff housing. Because the Stanford Campus Residential Leaseholders (SCRL) survey was not made available to the County during the preparation of the draft EIR, it is difficult to assess the accuracy of its methodology and implementation.

A vacancy rate of 0.3% was recorded by the Census in April 1990, or between 2 and 3 vacant dwelling units. It is entirely possible that a perceived vacancy rate of "0%" is not inconsistent with short-term vacancies of 2-3 dwelling units that occur periodically when changes in occupancy occur.

The second footnote to Table 4.3-7 has been amended to recognize that the percentage of households with children may be higher than 15% (reported in 1990 by the Census Bureau). The 1992 SCRL survey suggests that as many as 29% of households have children. (See above for revision.)

If the SCRL assumptions are used, there could be as many as 488 K-12 school-aged children, 236 more than using the 1990 Census as the basis for population assumptions. The estimated ADULT population would be 11,918 under the higher, SCRL survey assumption, rather than 11,477. This would not make a substantial difference in other analyses. In addition, most of the 668 new units are substantially higher density than existing housing and are assumed to be smaller than existing units. Therefore, the average household size for the new units is expected to be lower.

COMMENT LETTER 93, THE ROBERT N. BUSH FAMILY, 8/7/00

Response to Comment 93-1

Comment Summary: The comment states that the CP/GUP will likely lead, over the lifetime of the plan, to hundreds more hikers daily in our "foreground view" and great loss of privacy and quiet enjoyment of our home and garden.

Refer to Response to Comment 92-16.

Response to Comment 93-2

Comment Summary: The comment states that Thomas Church, the renowned California landscape architect designed their garden in the 1950's specifically to take advantage of the site's broad open views to the foothills, and that no fence or hedge could screen the garden and interiors from the hundreds of daily passersby.

Refer to Response to Comment 92-16.

Response to Comment 93-3

Comment Summary: The comment states that impact OS-5 should be considered significant because of the "loss or alteration of a specific scenic resource" that will occur from the use of a short trail segment that is part of the "Dish" trail system.

Refer to Response to Comment 92-16.

COMMENT LETTER 94, LIZ KNISS, MAYOR, CITY OF PALO ALTO, 8/7/00

Response to Comment 94-1

Comment Summary: The comment states that the Draft EIR and CP/GUP need to analyze mechanisms that will provide permanent, and long-term (25 years or more) dedication of open space for the foothill lands southwest of JSB. The Draft EIR should discuss the inevitable growth that will occur in the foothills as the core campus approaches buildout.

Refer to Master Response 9, Additional Open Space Protection. It would be speculative for the Draft EIR to analyze development not proposed by the CP/GUP. The Draft EIR concludes that open space impacts would be significant from potential development that could occur with CP proposed land use in the Lathrop District. The Draft EIR includes alternative land use (LU-A and LU-B) and Academic Growth Boundary (AGB-A and AGB-B) components that would reduce the significance of the identified impact.

Response to Comment 94-2

Comment Summary: The comment states that the CP/GUP are inconsistent with the City of Palo Alto's adopted Urban Growth Boundary, and the Santa Clara County General Plan policies C-GD-19 through C-GD-22.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 94-3

Comment Summary: The comment states that the proposed CP land use designation of "Open space and Academic Reserve" for the majority of the foothills is further indication that this area is ultimately "reserved" for development. The Draft EIR should identify land to be maintained as open space and should include a description of allowable uses and intensities within this use area.

Refer to Master Response 9, Additional Open Space Protection. The Draft EIR includes an alternative land use (LU-C) component that, if adopted, would change the proposed land use designation from Open Space and Academic Reserve to Open Space and Field Research.

Response to Comment 94-4

Comment Summary: The comment states that the Draft EIR should address public access to Stanford lands, and how the CP/GUP could lead to further exclusion of public access to areas that have historically been used for open space purposes.

The Draft EIR concludes that proposed modifications to the use of the Stanford "Dish" area could result in decreased availability of historical public access to the foothills. However, the proposal to limit access to the "Dish" area is not a part of the CP/GUP. Based upon the population increases that would occur from implementation of the GUP, the Draft EIR recommends mitigation measure OS-3. This mitigation measure is intended to increase public access to the foothills and encourage alternate forms of transportation by providing trail corridors that link with other regional trail segments.

Response to Comment 94-5

Comment Summary: The comment states that it is not clear from Figure 2-4 whether or not the "Dish" is included within the proposed Special Conservation land use area. The City strongly believes that the "Dish" area should be protected and maintained for open space purposes.

The "Dish" is located to the south of the Special Conservation land use designation. However, several of the trails that lead to the "Dish" are located within this designation. The CP does not propose any changes to the land use designations near the "Dish" area that would decrease existing open space protection. Refer to Response to Comment 94-4.

Response to Comment 94-6

Comment Summary: The comment states that open space easements have been used before by Stanford as a means to achieve long-term open space protection, and therefore, the Draft EIR should analyze the use of easements as a means to protect existing open space on a long-term basis.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 94-7

Comment Summary: The comment states that the Draft EIR should examine the placement of a "green belt" around the campus that would identify the University's long-term vision of academic buildout.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 94-8

Comment Summary: The comment states that the Draft EIR should evaluate an Academic Growth Boundary consistent with the City of Palo Alto's urban growth boundary/urban service area.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary, which contains a figure showing Palo Alto's Urban Service Area Boundary. Revision of Figure 7.1 is not necessary.

Response to Comment 94-9

Comment Summary: The comment requests evaluation of an alternative to constructing housing on the Stanford Golf Course, and requests evaluation of the golf course's value as a cultural resource, recreational open space, and habitat.

Refer to Master Response 4, Alternative Housing Sites; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign; and Master Response 8, Historical Significance of the Golf Course. Constructing the proposed housing in a manner that integrates it into the existing fabric of the golf course would likely have greater impacts than reconfiguring the golf course due to the loss of remaining natural areas on the course.

Response to Comment 94-10

Comment Summary: The comment states that the evaluation of the Reduced Project Alternative does not consider differences in degree of environmental impact.

Refer to Master Response 2, Reduced Project Alternative.

Response to Comment 94-11

Comment Summary: The comment requests evaluation of a Reduced Project Alternative that reduces academic development but does not reduce housing.

Refer to Master Response 2, Reduced Project Alternative, which evaluates the suggested alternative.

Response to Comment 94-12

Comment Summary: The comment requests that the EIR provide an alternative that reduces impacts of development, while not necessarily reducing the square footage of development, and recommends a more compact development pattern.

The alternative components identified in the Environmentally Superior Alternative described on page 7-57 of the Draft EIR, as well as other alternative components, reduce impacts without reducing square footage. They also restrict development to the existing developed areas of the campus. Also refer to Master Response 3, Intensified Development Alternative.

Response to Comment 94-13

Comment Summary: The comment states that given that the EIR and Community Plan/GUP identify up to 20,000 square feet of development outside the City's (Palo Alto) urban service

area, i.e. on Lathrop property, the conclusion of consistency with the City's Comprehensive Plan is unsupported.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 94-14

Comment Summary: The comment states that by continuing to prepare separate environmental documents for on-going development projects, whose processing overlaps with the Community Plan/GUP EIR and approval process, the County makes it difficult for the public to understand the impacts of all proposed developments for Stanford's lands. During the remaining approval process for the Community Plan/GUP, the City (Palo Alto) strongly believes that Stanford should cease pursuing separate project approvals.

Refer to Master Response 1, Statement for or Against the Project or Project Components. The scope of the CP/GUP Draft EIR does not include projects that are being processed under separate use permits with the County or other jurisdiction; however, these projects are included in the cumulative analysis. Other projects are considered part of the existing GUP and therefore included in the baseline analysis, as indicated in the Draft EIR.

Response to Comment 94-15

Comment Summary: The comment states that the Draft EIR should include the Carnegie project as part of the CP/GUP, or, if not included, should clearly specify that the 20,000 square feet of development proposed for the Lathrop District, located south of JSB, is not describing the Carnegie Foundation project.

Refer to Response to Comment 94-14.

The Draft EIR is modified as follows:

Page 2-14. Table 2-2, the following is added at the end of footnote 1:

The Carnegie Foundation project is not included in either the existing nor proposed GSF numbers.

Response to Comment 94-16

Comment Summary: The comment states that the Draft EIR should provide more detailed information about Stanford's levels of existing and proposed development for all its property, regardless of jurisdiction.

The purpose of the CP is to provide a framework for decisionmaking by the County regarding development on Stanford lands in unincorporated Santa Clara County. The CP policies are based on the particular combination of use types that exist and will continue to exist on these lands. The CP is not meant to be a comprehensive plan for all Stanford-owned lands. The Draft EIR analyzes impacts associated with the CP/GUP as required by CEQA.

Response to Comment 94-17

Comment Summary: The comment states that the Draft EIR should provide more detailed definitions of the proposed land use designations included in the CP and the Academic Growth Boundary. The City also believes that the AGB should be kept in place, coterminous with the City's urban growth boundary, for the maximum period of time permitted by County regulations.

The County has prepared a Preliminary Staff Recommendation for the Stanford University Community plan dated August 2000. This document includes additional detail for proposed land use designations and provides additional direction for implementation of the Academic Growth Boundary at Stanford. The proposed AGB would follow the alternative component (AGB-A) that is included in the Environmentally Superior Alternative of the Draft EIR. Also refer to Master Response 1, Statement for or Against the Project or Project Components, Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary and Master Response 10, Community Plan Description of Density and Intensity of Development.

Response to Comment 94-18

Comment Summary: The comment states that the Development Districts identified in the Draft EIR give the impression that proposed development described in the GUP is not only anticipated to occur in these districts, but would be specifically limited to these areas. However, the language in the CP/GUP itself indicates otherwise.

The Draft EIR states on page 2-12 that "As proposed by Stanford, the distribution of academic development within Development Districts in the GUP application was intended to be illustrative for purposes of estimating environmental impacts, but development would not be limited to the specific distribution proposed in the GUP application." This distribution was identified for the purpose of environmental review. Any substantial deviation from this distribution would be evaluated in the environmental review for individual proposed building projects.

Response to Comment 94-19

Comment Summary: The comment states that there is no factual basis for reaching the conclusion that this project will not have a significant impact on existing residential neighborhoods in the City of Palo Alto.

The Draft EIR has evaluated impacts of the project and has determined that there would be significant unavoidable impacts in several areas, including traffic, noise and growth inducement, all of which would affect residential neighborhoods. Environmental review will be required for all future proposed building projects under the GUP, except those that are exempt from CEQA. It is also possible that future project-specific analyses will determine that there are additional significant impacts. It is the purpose of this EIR to identify the significant effects associated with Stanford's overall development program, but this does not preclude the necessity for additional analysis as future projects are proposed. See the discussion on page 1-3 of the Draft EIR.

Response to Comment 94-20

Comment Summary: The comment states that the EIR should provide an estimate of the building square footage that will result from the construction of the proposed dwelling units to indicate the overall scale of the proposed project.

It is possible to estimate the square footage of housing units, using an average size of 550 GSF for graduate and undergraduate housing, and 1,000 for residents and postgraduate fellows. This results in a total additional 3,485,000 square feet of development in the Academic Campus, including both academic development and housing. Sizes of faculty/staff housing are more variable, but would probably average 2,000 square feet. The County uses the common planning practice of evaluating residential development of the context of units rather than square feet at this planning level.

Response to Comment 94-21

Comment Summary: The comment states that the EIR should further discuss the "standard employment multiplier and how it is used to determine growth-inducing impact."

The employment multiplier referenced in Chapter 5 is a measure of the estimated number of jobs that could result from additional economic activity as a consequence of a proposed project. For example, the University's plans to construct additional academic space are expected to accommodate more students, faculty, and staff, which, in turn, could lead to a demand for additional retail and service establishments that employ other individuals. The ABAG model estimates the ratio of additional jobs based on the type of activity (industry sector) stimulating those jobs (e.g., health services or education services). To evaluate the potential growth-inducing employment impact of the University's Community Plan, the EIR identifies the types of development proposed in the plan, their corresponding industry sectors in the ABAG model, and the ratio (expressed as a fraction) of additional jobs that could result from each job created by the applicable industry sectors under the Community Plan.

Response to Comment 94-22

Comment Summary: The comment states that this project will result in a significantly increased need for additional affordable housing, especially in regard to service personnel who would be attracted to the area by the additional growth but would have limited affordable housing opportunities in the area. The EIR should identify additional housing sites on and off campus, in order to meet regional housing needs or identify other means to address the issue.

The need for additional sites to accommodate housing as a result of growth inducing impacts and unmet needs among the existing population is discussed in Chapter 5, Impacts GI-1 and GI-CI1. It is beyond the scope of the EIR to identify specific sites where such housing could be constructed. The Draft EIR identifies the fact that this impact would still be significant after mitigation. Mitigation PH-3 requires that Stanford construct housing commensurate with its academic development, which will accommodate the direct increase in housing demand resulting from GUP development.
Comment Summary: The comment states that the EIR should discuss the lessened environmental impacts or potential benefit that would result through assurance of affordable housing being provided either on –campus or in the immediate vicinity of the campus.

Chapter 4.3, Impact PH-3 discusses the general consequences and benefits of increasing the supply of affordable housing. Refer to also Response to Comment 52-4.

Response to Comment 94-24

Comment Summary: The comment states that the EIR should include information regarding the existing shortage of on-campus housing, so that it is clear how the proposed housing will accommodate Stanford's total housing need, not just the need that would be created through the build-out of the proposed GUP.

The footnotes to Table 4.3-1 on page 4.3-3 of the Draft EIR discuss the number of students housed on campus and the number of faculty/staff dwelling units. In addition, page 4.3-10 and Table 4.3-10 (on page 4.3-12) discuss the current shortage of campus housing for students, faculty, and staff, and compare the affordability and availability of housing to various income groups. According to Table 4.4-5 of the Draft EIR, the baseline number for students is about 14,100 and for faculty and staff about 12,100. This means that, under baseline conditions, approximately 4,700 students and approximately 10,600 faculty and staff are not housed by the University.

Response to Comment 94-25

Comment Summary: The comment states that the Draft EIR fails to analyze the impacts of CP/GUP growth on City of Palo Alto community facilities, such as libraries and parks.

Refer to Response to Comment 3-2. In the absence of more specific information from the City of Palo Alto on this use it is not possible for the County to assess the impacts of the project on these community services. Assessment of impacts fees as suggested in the comment would require additional infromation to substantiate analysis of the impact.

Response to Comment 94-26

Comment Summary: The EIR proposes mitigation measures (i.e., payment of impact fees) for school impacts that appear to be in accordance with pertinent statutory and case laws. Although the actual impacts to schools would remain significant after the payment of fees (i.e., mitigation), the EIR should note that these impacts would be significant and therefore require the adoption of a Statement of Overriding Consideration by the County Board of Supervisors.

State law severely limits the County's ability to impose mitigation for school facilities impacts. While PAUSD and Stanford are free to negotiate additional voluntary payments, the County does not have the legal authority to require Stanford to pay fees in excess of the statutory fees. Refer to also Responses to Comments 91-5 and 91-6.

Ş.

Comment Summary: The EIR should state how many students Stanford contributes to the District at present and how many would be added through the proposed build-out of the project.

Chapter 4.10, (Impact Analysis PS-2) provides an estimate of the number of additional schoolaged children that could be expected from proposed housing development. The footnotes to Table 4.3-1 provide a current estimate of school aged children.

Response to Comment 94-28

Comment Summary: The City of Palo Alto believes that Stanford must be involved in the discussion and eventual implementation of additional options for addressing school impacts for a new middle school.

This comment does not directly relate to the adequacy of the EIR but recommends policy actions on the part of the University. Also refer to Responses to Comments 3-2, 91-5, 91-6, and 94-26.

Response to Comment 94-29

Comment Summary: The comment states that the Draft EIR should provide a more viable alternative school site, and that use of proposed alternative sites listed on pages 4.10-8 and 9 would potentially impact community facilities within the City of Palo Alto.

No school development is proposed as part of the CP/GUP. It is beyond the scope of this EIR to evaluate potential environmental impacts from possible uses of sites that are not part of the lands controlled under the draft Community Plan or by the University. Also refer to Response to Comment 67-2. School sites analyzed in the Draft EIR were determined based on input from the Palo Alto Unified School District. The need to relocate City facilities from the Terman site is not a direct result of growth from the proposed project. School impacts have been evaluated and mitigated to the extent permitted by state law.

Response to Comment 94-30

Comment Summary: If a viable school site is not included in the EIR, and if a school must be constructed on the sites currently occupied by community center facilities, Stanford must pay their fair share of acquisition costs to mitigate the direct impact of their growth on Palo Alto community centers.

It is beyond the scope of this EIR to evaluate the adequacy of specific sites for schools or whether an existing community center facility site in Palo Alto will be needed. Refer to Responses to Comments 3-2, 80-3, 91-5, 91-6, 94-26 and 94-29.

Response to Comment 94-31

Comment Summary: The cumulative impacts to schools and community services facilities from the anticipated 10-year residential and employment growth of both City of Palo Alto and Stanford, using the latest available demographic information has not been provided in the EIR.

The most current available demographic estimates and projections were used in preparing the draft EIR and evaluating cumulative impacts. Sources included the California Department of Finance, 1999 E-5 report (City/County Population and Housing Estimates), the Association of Bay Area Governments *Projections 2000*, Santa Clara County Planning Office (1999), California Employment Development Department Labor Market Information (October & November 1999), and Stanford University (1999 and 2000).

Response to Comment 94-32

Comment Summary: The comment states that traffic mitigation measures need to be placed into a more comprehensive context. Therefore, Stanford should prepare an integrated transportation plan with both long- and short-term elements. Long-term elements should include a variety of solutions to mitigate vehicular congestion and parking demand. The plan should contain subarea analyses for the core campus, the Medical Center, the Research Park, and the Shopping Center; and should be developed in conjunction with Santa Clara County, Santa Clara County VTA, Palo Alto, Menlo park, and East Palo Alto. The plan should emphasize transit, transportation demand management (TDM), bicycling, walking, and traffic calming to create a safer environment for alternative modes of use.

The factors influencing transportation demand and traffic for both Stanford and the surrounding region are part of a dynamic process. For that reason, the Draft EIR identifies a series of mitigation measures that are designed to be most responsive to the changing transportation environment and the specifics of individual projects as they become more clearly defined. The variety of approaches is meant to address this complex situation in the context of the EIR, which only addresses unincorporated lands. In particular, the site-specific traffic studies for certain GUP projects as described in mitigation measure TR-6B on page 4.4-107 of the Draft EIR, will address in detail traffic generation, trip distribution, project access, safety and the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities as deemed appropriate by the County Planning Office. This flexibility will allow for development of more specific mitigation measures that will be appropriate for the conditions that may exist when each project is ready to be implemented if the studies reveal new or substantially more sever significant impacts. Such an approach is better able to respond to unforseeable changes to the transportation environment that may occur after the completion of this EIR process.

Stanford's participation in neighborhood transportation studies as discussed in mitigation measure TR-6A on page 4.4-106 of the Draft EIR, is another element of the mitigation plan that provides the needed flexibility to best respond to the transportation needs of specific neighborhoods at specific times.

The expanded trip reduction and monitoring program specified in mitigation measure TR-5B is designed to provide the ability to address the more global issues pertaining to all Stanford facilities and users, while maintaining the flexibility to respond to changes in the local and regional transportation environment. By specifying the "no net new commute trip" goal instead of specific measures, this mitigation allows Stanford to continuously explore means of reducing automobile use through a wide range of appropriate methods. Thus, Stanford will be able to optimize its efforts in response to changing travel demand on campus and throughout the

surrounding region, as well as coordinate with changes in transit service and other alternate modes of transportation. There would even be the opportunity to implement any new methods or technologies that become available after completion of this EIR process. The cooperative trip reduction opportunity also creates an incentive for multi-jurisdictional efforts. Also refer to Response to Comment 14-5.

Response to Comment 94-33

Comment Summary: The comment states that the EIR should provide an analysis of the potential traffic impacts to existing Palo Alto neighborhoods such as the College Terrace neighborhood, just south of Stanford Avenue. Additional vehicle trips along these residential streets would be in conflict with the City's Comprehensive Plan goal of reducing through-traffic impacts on residential areas.

As indicated in the Responses to Comments 14-1, 14-5, 14-7, 14-8, 14-9, 59-1, 62-1, 62-2, 62-3, 62-4, 74-1, and 74-5 and discussed in mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford would participate in neighborhood traffic studies to determine Stanford's share of through traffic on existing neighborhood streets. These studies would identify and Stanford would contribute to mitigation measures required to offset the impacts of Stanford traffic in existing neighborhoods.

Response to Comment 94-34

Comment Summary: The comment states that it is imperative that the proposed GUP maintain the "no net new commute trips" standard included in the 1989 GUP. Additionally the Draft EIR must discuss how independent monitoring of Stanford's vehicle trip contribution to the Palo Alto street system would be done; and, importantly, if monitoring determines that traffic levels have exceeded identified thresholds the EIR must describe what mechanisms would then be used to reduce vehicle trips or their impacts to acceptable levels.

The discussion of mitigation measure TR-5B on page 4.4-94 of the Draft EIR, states that direct monitoring by the County will be required to determine Stanford's compliance with the "no net new commute trips" goal. This goal would provide more effective mitigation than through the 1989 GUP through direct counts rather than calculation of compliance through a formula. The County may choose to hire a qualified independent consultant to carry out all or part of the monitoring program. The Draft EIR text continues with a detailed description of the cordon line locations and the method to be used in performance of the monitoring program. Mitigation TR-5C on page 4.4-97 of the Draft EIR identifies cooperative trip reduction efforts that Stanford may pursue by itself or in cooperation with other jurisdictions to reduce the number of vehicle trips in the area surrounding the Stanford campus. The use of such methods to contribute towards Stanford's trip reduction goal are subject to approval by the County and must be based on independently verifiable information. If the "no net new commute trips" goal is not achieved, Stanford would contribute fair share funds for Tier 2 intersection capacity improvements identified in mitigation measure TR-5D on Page 4.4-97 of the Draft EIR. The jurisdiction receiving the funds may choose to use those funds for the proposed intersection modifications or for trip reduction measures that benefit the intersection in question.

Comment Summary: The comment states that the EIR should discuss the lessened transportation impacts, or potential benefits that could be derived from more compact development patterns on the core campus, such as increased use of parking structures in lieu of surface-level parking facilities.

Refer to Master Response 3, Intensified Development Alternative. The construction of oncampus housing would allow many existing off-campus students and staff to move onto the Stanford campus. This would eliminate the need for those people to make commute trips through the neighboring jurisdictions to reach the campus. The more self contained the campus becomes though a complimentary land use mix, the less there will be a traffic impact on the surrounding communities. However, there is little transportation benefit to be gained from the use of parking structures in lieu of surface parking. Use of parking structures allows for more efficient use of land than an equivalent number of spaces in surface lots, potentially allowing for more compact development patterns.

Response to Comment 94-36

Comment Summary: The comment states that the EIR must address the impacts to the Palo Alto street network that would occur due to increased truck-traffic related to construction activities that would result from the significant amount of development under the GUP/Community Plan.

Refer to Responses to Comments 14-10 and 14-15. Mitigation measures for construction traffic impacts are detailed in the Draft EIR in Mitigation Measures TR-7A through G. Mitigation TR-7H described on page 4.4-111 of the Draft EIR provides for an alternate construction mitigation whereby Stanford would submit a detailed construction impact mitigation plan to the County Planning Office prior to commencing any construction activities with potential transportation impacts. This plan would address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. Details such as the routing and scheduling of material deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access would be described and approved.

Response to Comment 94-37

Comment Summary: The comment states that while intersection capacity increases may mitigate for peak-hour vehicle trips in the short-term, they also have the result of inducing greater numbers of vehicle trips in the future. Evaluation of each proposed intersection widening improvement should take into account these possible secondary effects.

As discussed in the Responses to Comments 92-4 and 94-34, mitigation measure TR-5D allows the jurisdiction receiving intersection improvement funds from Stanford to use that money in whatever way they see fit to benefit that intersection either through trip reduction measures or through capacity improvements. Thus, a jurisdiction may choose an alternate mitigation measure if they feel that the proposed capacity improvement would induce more future vehicle trips at through the intersection in question, analysis of secondary effects would be speculative and is therefore not warranted.

Response to Comment 94-38

Comment Summary: The comment states that with respect to pedestrian travel, all intersection widenings, lengthen pedestrian crossing distance and time. This effect should be analyzed for each proposed intersection project as well as measures to enhance pedestrian safety such as median refuges.

As indicated in the Response to Comment 94-39, the design of all intersection improvements would include consideration of pedestrian and bicycle impacts. Any crosswalk that is lengthened would be provided with necessary improvements such as longer pedestrian crossing intervals or median refuges.

Response to Comment 94-39

Comment Summary: The comments states that Intersection widenings have three potential impacts on bicyclists: 1) Increased complexity for cyclists navigating intersections; 2) loss of bike lane space to create turning lanes; and 3) Lengthening the exposure time of cyclists traveling across the widened intersection. These effects should be analyzed for each proposed intersection project, as well as measures to enhance cycling safety.

The design of all intersection improvements would include consideration of pedestrian and bicycle impacts. The complexity of any intersection improvement would be kept to a minimum for the benefit of pedestrians and automobiles as well as cyclists. Intersection capacity improvements would be designed to maintain bike lanes by adding new pavement for additional lanes, rather than taking away bicycle lane space. Intersection improvements would be designed to minimize any increase in exposure time for cyclists crossing the intersection. Where appropriate, additional signs may be used to alert drivers to the presence of bicyclists.

Response to Comment 94-40

Comment Summary: The comment states that roundabouts should be considered in the EIR as an alternative to such conventional intersection treatments as signalization, new signal phases, and intersection widening.

Roundabouts can be effective traffic calming tools when used in appropriate locations and situations. Therefore, it would be reasonable to consider them as potential mitigation measures when designing any necessary intersection improvements. As indicated in the Responses to Comments 54-2, 65-2, and 92-4, and discussion of mitigation measure TR-5D on page 4.4-98, there would be flexibility in the design of intersection improvements at the time that those improvements are triggered. The text of mitigation measure TR-5D has been changed as shown in Response to Comment 54-2 to provide for greater flexibility and the ability to designate alternate mitigation measures that may be designed at the time that the mitigation measures are triggered.

Comment Summary: The comment states that Stanford should consider market-based measures to manage parking demand, such as implementation of parking prices that reflect the costs of both parking capacity and traffic congestion.

Stanford can use many measures such as this to control parking demand and automobile use through its TDM programs as discussed in mitigation measure TR-5B on page 4.4-93.

Response to Comment 94-42

Comment Summary: The comment states that a discussion should be provided in the EIR of how the composite trip generation count is disaggregated to the various categories of trip makers. The EIR should also clearly state that the trip generation rates used for the project include the present level of transportation demand management. Additionally, the trip generation of visitors and contractors should be included in the analysis. Finally, the off-campus housing units that will be vacated when the graduate students living off-campus are relocated onto the campus will be occupied by new residents, resulting in continued trip generation from these off-campus units, but with a new trip distribution. These backfill trips should be included in the EIR traffic analysis.

Table 4.4-22 on page 4.4-63 of the Draft EIR presents the total trip generation of the GUP disaggregated by the type of trip maker and by the origin or destination zone for those trips. This is based on the same calculations that were used to prepare Table 4.4-19 and Table 4.4-20 on pages 4.4-58 and 4.4-59 of the Draft EIR. Both types of tables were created based on applying the trip generation rates to the projected individual project components of the GUP. The only difference between the two types of tables is that Table 4.4-19 and Table 4.4-20 provide a summary of trips based on the total of each land use category, and Table 4.4-22 provides the same data based on groupings of projects by geographical location and by the type of trip maker.

The text of section 4.4.E.1 on page 4.4-52 of the Draft EIR indicates that the trip generation rate includes the level of travel demand management, and visitor and contractor trips present at the time of the trip generation study. The method used to determine Stanford's trip generation makes it impossible to have done otherwise. However, modification will be made to the text to improve its clarity.

The Draft EIR is revised as follows:

Page 4.4-52. The third sentence in the second paragraph is revised to read:

Trip generation was based on traffic counts conducted at 14 cordon gateways (shown on Figure 4.4-9), which provide access into and out of the Campus and therefore reflects current levels or rates of non-auto transportation mode use, <u>based on Stanford's TDM program at the time of the counts</u>, but not potential increased future use under a "no net new commute trips" standard as proposed by the County. <u>The trip generation also reflects the generation of secondary trips such as those made by visitors and others</u>.

The off-campus housing units likely to be vacated by Stanford graduate students and occupied by new residents would be located primarily beyond the boundaries of the project study area, as supported by the zip code based trip distribution data discussed on page 4.4-60 of the Draft EIR. Therefore, although there would be new trips made to and from those units, such trips would not be associated with Stanford and it is not possible to predict how many, if any would enter the study area. The analysis did not assume commensurate reduction in off-site generated trips.

Response to Comment 94-43

Comment Summary: The comment states strongly supports the "no net new commute trips" mitigation strategy instead of the Tier 2 intersection improvements described in the EIR. Many of these improvements are only minimally feasible from a physical or political standpoint and/or have other negative effects. For all Tier 2 projects, conceptual-level cost estimates should be provided, as well as Stanford's fair share.

As discussed in the Responses to Comments 54-2, 65-2, and 92-4, and discussion of mitigation measure TR-5D on page 4.4-98, there would be flexibility in the design of Tier 2 intersection improvements at the time that those improvements are triggered. The text of mitigation measure TR-5D has been changed to provide for greater flexibility and the ability to designate alternate mitigation measures that may be designed at the time that the mitigation measures are triggered. It is also not possible to know when these mitigation may be triggered. Thus, it would be premature to prepare even conceptual cost estimates that would necessarily be based on a specific improvement.

Response to Comment 94-44

Comment Summary: The comment states that a coordinated trip reduction effort for the Stanford Research Park was not used as a credit toward "no net new commute trips" because most of the Park lies south of Page Mill Road. The boundary of the cooperative trip reduction area should be extended south to include all or most of the Research Park.

Mitigation measure TR-5C on page 4.4-97 of the Draft EIR identifies coordinated trip reduction for the Stanford Research Park as one of the measures for which the County may wish to give Stanford credits towards "no net new commute trips". As indicated by the comment, much of the Stanford Research Park lies south of Page Mill Road. Therefore the text on page 4.4-97 of the Draft EIR will be changed.

The Draft EIR is revised as follows:

Page 4.4-97. The last sentence in the second paragraph is revised to read:

Only programs that would lead to trip reduction in the area bounded by US 101, Willow Road/Sand Hill Road, Interstate 280, and Page Mill Road, and the Stanford Research Park may be considered for this credit.

Comment Summary: The comment states that City staff supports traffic calming mitigation measures. However, the EIR should be more specific regarding Stanford's responsibility to determine the amount of cut-through traffic generated. Specifically Stanford should be responsible to pay for and conduct a license plate and/or origin-destination survey to determine which vehicles are travelling to/from Stanford Lands.

Mitigation measure TR-6A on Page 4.4-106 of the Draft EIR, states that Stanford shall participate in future neighborhood traffic studies for the purpose of determining how much, if any, of the cut-through traffic is attributable to cars travelling to or from the Stanford Central Campus. The text of this measure will be modified to add more detail

The Draft EIR is revised as follows:

Page 4.4-106. The last paragraph is revised to read:

..., Stanford shall participate in <u>financing and conducting</u> any future neighborhood traffic studies initiated by Palo Alto or Menlo Park that address neighborhood cut-through traffic. Stanford's participation shall be for the purpose of determining how much, if any, of the cut-through traffic is attributable to cars travelling to or from the Stanford central campus. Such studies may involve the use of license plate surveys and/or origin-destination surveys to determine which vehicles are associated with Stanford, which vehicles are local residents, and which vehicles are cut-through traffic not associated with Stanford....

Response to Comment 94-46

Comment Summary: The comment states that the Draft EIR should be revised to also include an analysis of runoff impacts based on a 10-year, 6-hour storm event since additional mitigation facilities may be required to prevent increased runoff from this more frequent event.

The 100-year 24-hour storm event peak runoff rates and detention basin capacities presented in the Draft EIR are intended to be order of magnitude estimates for purposes of evaluating overall project impacts and the feasibility of mitigation. Although the size of detention facilities may differ slightly based on modeling of other storm events, it has been determined that Stanford has ample land available to construct the required detention facilities. Subsurface detention facilities can also be used in any areas where land area is limited. The estimates are preliminary and are based upon estimates regarding the additional impervious surfaces that may be constructed in each of the subareas shown in Figure 4-5.1.Other storm years will need to be used in the actual design of stormwater facilities. Modeling of multiple storm event frequencies and durations is appropriately done at the design stage when more detailed information is available.

For an expanded description of the proposed mitigation, including the consideration of additional design storms to assure there will be no post-development impacts on City facilities, refer to Response to Comment 14-11.

Comment Summary: The City requests that, in addition to stormwater detention basins, Stanford also consider use of other facilities for controlling peak runoff.

Responses to this and several other comments regarding alternative measures to reduce increases in post-development runoff have been addressed through revision of Mitigation Measure HWQ-1 Manage Stormwater Runoff in the Final EIR. Refer to Response to Comment 14-8.

Response to Comment 94-48

Comment Summary: The City requests that the EIR be expanded to cover potential water quality impacts in greater detail (e.g. storm water discharges containing potential copper originating from motor vehicle brake pad wear and from roofing materials).

The Draft EIR explains that urban runoff from developed areas can contain a wide variety of pollutants, including metals (such as copper), solvents, petroleum products, sediment, and pesticides, and that those pollutants could cause surface water quality degradation. Refer to the discussion of post-construction water quality impacts under Impact HWQ-4 on page 4.5-21of the Draft EIR.

In any case, Mitigation Measure HWQ-4 on page 4.5-21 of the Draft EIR requires that "Site improvements for new buildings and parking lots shall include BMPs that are effective for preventing post-construction storm water pollution caused by urban runoff. Parking lot runoff BMPs considered shall include grassy swales or vegetated filter strips. Prior to construction, Santa Clara County Land Development Engineering shall review and approve the proposed post-construction BMPs."

Response to Comment 94-49

Comment Summary: The comment asserts that California tiger salamander mitigation Option 2 should be incorporated into the project since it is the superior and least damaging alternative; EIR should examine a Lathrop "no-build" option to reduce California tiger salamander impacts even more.

The County developed Option 2 to allow further protection of the salamander. The Draft EIR alternatives analysis includes a No Project-No Additional Permits option, which would not allow further development in the Lathrop area, but would allow development north of JSB through buildout of the existing GUP and limited development allowable without a use permit. The Draft EIR also evalutes Alternative Component ABG-B, which does not allow development of the Lathrop District. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 94-50

Comment Summary: The comment requests an analysis of the habitat value of the Stanford Golf Course including impacts to western bluebird and other species.

Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign.

Comment Summary: The comment states that the Draft EIR is silent on how monitoring will occur.

A mitigation monitoring program is included as part of the Final EIR.

Response to Comment 94-52

Comment Summary: The comment supports the continuation of annual development reports under the proposed GUP.

The County intends to continue the requirement of an annual report as a condition of the General Use Permit. Stanford may be required to fund preparation of the report.

Response to Comment 94-53

Comment Summary: The comment states that reduction of construction hours would limit noise impacts to residential areas in Palo Alto.

Using the most restrictive construction hours of Santa Clara and County, Palo Alto, the proposed construction hours are 8:00 AM to 7:00 PM Monday to Friday, 9:00 AM to 7:00 PM on Saturday, and no work on Sundays or holidays.

The Draft EIR is revised as follows:

Page 4.12-18, add the following after the first bullet in the list of measures in NOISE-1:

 For construction areas with a boundary along the Palo Alto City limit construction hours would be limited to 8:00 AM - 7:00 PM, Monday through Friday, 9:00 AM - 7:00 PM Saturday, and no work on Sundays and holidays.

Response to Comment 94-54

Comment Summary: The comment states that the Draft EIR should discuss the resources (i.e., staffing) that Santa Clara County would have in place to adequately monitor and enforce the proposed development.

The County intends to continue the requirement of an annual report. However, the County intends to prepare the report under its own direction rather than requiring Stanford to prepare and submit the report as occurred in the past. The preparation of the report and all other GP monitoring shall be funded by Stanford, thus ensuring that resources for monitoring are adequate.

Response to Comment 94-55

Comment Summary: The City notes that Arastradero Creek is a tributary to Matadero Creek.

The Draft EIR is revised as follows:

•

Sections 4.5.A.1, 4.5A.2, and Table 4.5.1 are revised to read:

4.5.A.1 General

Within Santa Clara County, the 4,017-acre Stanford Community Plan area (project area) is located primarily within the San Francisquito Creek and Matadero Creek watersheds. San Francisquito Creek and Matadero Creeks discharge into the southern portion of San Francisco Bay. A small portion of the project area is also located within the Arastradero Creek watershed. The approximate watershed boundaries within the project area are shown in Figure 4.5.1.

- Approximately 1,800 acres of the project area are located within the San Francisquito Creek watershed. Major surface waters in this area include San Francisquito Creek and Los Trancos Creek, Felt Lake (irrigation supply for the campus) and Lake Lagunita (seasonal recreational lake for the campus). San Francisquito Creek and Los Trancos Creek flow in a northerly or northeasterly direction. San Francisquito Creek forms the boundary between Santa Clara and San Mateo Counties.
- Approximately 2,200 acres of the project area are located within the Matadero Creek watershed. The major surface water in this area is Matadero Creek, which flows in a northeasterly direction. A small portion of the watershed drains in an easterly direction towards Deer Creek, which flows in a northerly direction to Matadero Creek. <u>Another small portion of the watershed drains in a southerly direction towards Arastradero Creek, which flows in a southerly direction towards Arastradero Creek, which flows in a southerly direction towards Arastradero Creek, which flows in a southerly direction to Matadero Creek. After leaving the project area, Matadero Creek flows through Palo Alto and is channelized toward the Bay.</u>
- Approximately 100 acres of the project area are located in the Arastradero Creek watershed. Arastradero Creek flows in a southerly direction.

4.5.A.2 Surface Water Hydrology

Matadero Creek Watershed

Subareas M-1 through M-7 drain to Matadero Creek, and Subarea D-1 drains to Deer Creek, which flows into Matadero Creek, and Subarea A-1 drains into Arastradero Creek. which also flows into Matadero Creek.

- Subarea M-1 is traversed by Matadero Creek. Storm runoff from Subarea M-1 enters Matadero Creek upstream of Junipero Serra Boulevard.
- Storm runoff from Subarea M-2 enters an existing drainage conduit located in Page Mill Road and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-3 enters an existing drainage conduit located near the intersection of Stanford Avenue and Dartmouth Street and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-4 enters an existing drainage conduit located in El Camino Real near Stanford Avenue and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-5 enters an existing drainage conduit in El Camino Real near Sierra Street and is ultimately conveyed to Matadero Creek.

- Storm runoff from Subarea M-6 enters an existing drainage conduit at El Camino Real near the Stadium and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-7 enters an existing drainage conduit at El Camino Real near Galvez Street and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea D-1 enters Deer Creek upstream of its confluence with Matadero Creek.
- Storm runoff from Area Subarea A-1 flows in a southerly direction away from the project area and enters Matadero Creek near the intersection of Arastradero and Page Mill Roads.

Arastradero Creek Watershed

 Storm runoff from Area A-1 flows in a southerly direction away from the project area. STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

Table 4.5-1

Watershed Characteristics

	Total Area ¹ (acres)	Existing Developed Area (acres)	Existing Undeveloped Area (acres)	Area in Proposed CP Land Use Designations (acres)				
Watershed Subarea				Academic Campus or Public School	Campus Residential	Campus Open Space	Open Space & Academic Reserve or Special Conservation	Total Developable Area ² (acres)
San Francisquito Creek								
S-1	380	40	340	30	40	40	270	70
S-2	520	50	470	360	40	30	90	400
S-3	30	30	0	30	0	0	0	30
L-1	220(300)	0	220	0	0	0	220	0
L-2	650	0	650	0	0	0	650	0
Matadero Creek								
M-1	540(980)	0	540	0	0	0	540	0
M-2	50	50	0	0	50	0	0	50
M-3	440	295	145	20	290	20	110	310
M-4	110	100	10	100	10	0	0	110
M-5	390	330	60	360	30	0	0	390
M-6	140	40	100	120	0	20	0	120
M-7	270	55	215	100	0	170	0	100
D-1	160	0	160	0	0	0	160	0
Arastradero Creek								
A-1	100	0	100	0	0	0	100	0

1. Includes those portions of the watershed subarea within the project area. Where the watershed includes lands outside the project area, the larger total is shown in parenthesis.

2. Developable area includes areas designated as Academic Campus or Campus Residential

Comment Summary: The 100-year rainfall total and average intensity appear to be underestimated.

On page 4.5-9, the Draft EIR indicates that the 100-year precipitation used to estimate storm runoff was 4.32 inches over 24 hours. The 24-hour precipitation estimate is based on an average intensity of 0.18 inches per hour. The estimated average intensity is based on Figure 5 from the County of Santa Clara Drainage Manual (Precipitation Intensity – Duration – Frequency Palo Alto) dated March 1966.

The average intensity noted on page 4.5-9 in the Draft EIR is incorrectly noted as 0.17 inches per hour. The correct intensity of 0.18 inches per hour was used to estimate the peak pre- and post-development discharges shown on page 4.5-10.

The Draft EIR is revised as follows:

The first paragraph on page 4.5-9 of the Draft EIR is revised to read

Based on the *Drainage Manual* for the County of Santa Clara, the 100-year precipitation used for estimating storm runoff was 4.32 inches (or $0.17 \ 0.18$ inches per hour over a 24-hour period). The peak storm runoff estimates are presented in Table 4.5-2. The hydrologic analysis was performed using the Technical Release 55 (TR-55) model developed by the United States Department of Agriculture Soil Conservation Service (SCS).

Response to Comment 94-57

Comment Summary: The Draft EIR should be revised to also include an analysis of runoff impacts based on a 10-year, 6-hour storm event since additional mitigation facilities may be required to prevent increased runoff from this more frequent event.

For an expanded description of the proposed mitigation, including the consideration of additional design storms to assure there will be no post-development impacts on City facilities, refer to Response to Comment 14-11.

Response to Comment 94-58

Comment Summary: The City notes that storm runoff from the Stanford Campus is currently conveyed in the City's storm drain system and the Santa Clara Valley Water District storm drain system to Matadero Creek, and that the EIR does not address impacts on these facilities under less than 100-year storm conditions.

Page 4.5-16 in the Draft EIR notes that the capacity of some drainage facilities downstream of the project have been exceeded by previous storm events. Accordingly, as mitigation, the Draft EIR requires that Stanford provide facilities to prevent runoff from the proposed development from causing downstream flooding. For an expanded description of the proposed mitigation refer to Response to Comment 14-11.

•

Comment Summary: The City notes that storm runoff from the Stanford Campus is currently to San Francisquito Creek, which has a less than 100-year capacity, and that the EIR does not address impacts on these facilities under less than 100-year storm conditions.

Page 4.5-16 in the Draft EIR already notes that the capacity of some drainage facilities downstream of the project have been exceeded by previous storm events. Accordingly, as mitigation, the Draft EIR requires that Stanford provide facilities to prevent runoff from the proposed development from causing downstream flooding. For an expanded description of the proposed mitigation refer to Response to Comment 14-11.

Response to Comment 94-60

Comment Summary: The City requests that, in addition to stormwater detention basins, Stanford also be required to incorporate certain design features for controlling peak runoff (including those described in the Bay Area Stormwater Management Agencies' "Start at the Source – Design Manual for Stormwater Quality Protection").

Responses to this and several other comments regarding consideration of measures other than detention basins to reduce increases in post-development runoff have been addressed through revision of Mitigation Measure HWQ-1 Manage Stormwater Runoff in the Final EIR. Refer to Response to Comment 14-11.

Response to Comment 94-61

Comment Summary: The City requests that water quality impacts may result from projects of any size, that the County is responsible to review and control water quality impacts from new development pursuant to its Urban Runoff Management Plan, and that Stanford should be required to prepare a SWPPP and implement BMPS on all development projects, regardless of size.

Responses to this and several other comments regarding water quality impacts, applicable County requirements, and applicable requirements pursuant to the General Storm Water NPDES Permit for Discharges of Storm Water Associated with Construction Activity have been addressed through revision of Mitigation Measure HWQ-3 Protect Water Quality and Mitigation Measure HWQ-4 Best Management Practices for Preventing Post-Construction Urban Runoff Pollution in the Final EIR. Refer to Response to Comment 2-1.

Response to Comment 94-62

Comment Summary: The City requests that the description of construction and post-construction water quality impacts and potential mitigation measures in the Draft EIR be expanded.

Responses to this and several other comments regarding potential water quality impacts and mitigation measures have been addressed through revision of Mitigation Measure HWQ-3 Protect Water Quality and Mitigation Measure HWQ-4 Best Management Practices for

Preventing Post-Construction Urban Runoff Pollution in the Final EIR. Refer to Response to Comment 2-1.

Response to Comment 94-63

Comment Summary: The comment states that "No net new Trips" (Draft EIR mitigation Tr-5B) and "cooperative trip reduction" (mitigation TR-5C) should be primary mitigation measures for intersections on major roads.

This is a good suggestion. With the exception of the Tier 1 improvements to the two campus intersections listed in TR-5A, the measures in TR-5B and TR-5C are proposed to be the primary mitigation measures for intersections on major roads.

Response to Comment 94-64

Comment Summary: The comment states that Tier 1 improvements for Arboretum/Palm and Welch/Campus Drive West should be implemented and supports giving Stanford the option of implementing a configuration other than that specified in the Draft EIR if the alternate improvement is equal or better. Specifically, the comment supports the option of a modern roundabout at Arboretum/Palm if so desired by Stanford.

The suggestion of flexibility in the implementation of improvements is similar to the Responses to Comments 54-2, 65-2, 92-4, 94-43, and discussion of mitigation measure TR-5D on page 4.4-98, where it is indicated that there should be greater flexibility in the design of intersection improvements at the time that those improvements are triggered. The text of mitigation measure TR-5D has been changed to provide for greater flexibility and the ability to designate alternate mitigation measures.

Response to Comment 94-65

Comment Summary: The comment states that generally Palo Alto does not support Tier 2 intersection projects, with the following exceptions: a) El Camino Real/Churchill (Palo Alto): this project is already in the Palo Alto CIP Stanford's fair share for this location should be given to the City upon approval of the GUP. b) Palo Alto does not support other Tier 2 intersection projects in Palo Alto or Santa Clara County. c) For Menlo Park intersections, Menlo Park should determine whether or not it would like to pursue the improvements and, if so, receive Stanford's fair share contribution for them. d) Palo Alto supports the "Sand Hill Road Widening as Alternative Mitigation" for the certain intersection impacts in Menlo Park and on the Stanford campus.

The El Camino Real/Churchill intersection is not a Tier 1 intersection, and fair share payment would be required not by approval of the GUP, but by failure to meet the "no net new commute trips" goal. It is noted that Palo Alto does not generally support Tier 2 intersection improvements except for El Camino Real/Churchill and the "Sand Hill Road Widening as Alternative Mitigation".

Comment Summary: The comment states that Palo Alto Supports Stanford's participation in future neighborhood traffic studies initiated by Palo Alto and Menlo Park (Mitigation TR-6A). Palo Alto suggests this mitigation be modified to require that Stanford be responsible to pay for and conduct a license plate and/or origin-destination survey to determine which vehicles are travelling to/from Stanford lands. Furthermore, the proportion of through traffic attributable to Stanford should be all traffic generated by the campus area whether or not it is related to the new GUP development.

As indicated in the Response to Comment 94-45, mitigation measure TR-6A on Page 4.4-106 of the Draft EIR states that Stanford shall participate in future neighborhood traffic studies for the purpose of determining how much, if any, of the cut-through traffic is attributable to cars travelling to or from the Stanford Central Campus. The text of this measure will be modified to add more detail. Refer to Response to Comment 94-45.

Response to Comment 94-67

Comment Summary: The comment states that Palo Alto supports the proposed TDM monitoring program for "no net new commute trips" described under mitigation TR-5B. Palo Alto requests that the following requirements for compliance be added to this monitoring program: a) Monitoring will be conducted annually. b) Stanford's failure to meet the "no net new commute trips" requirement by any amount in either the AM or PM peak hour for any two years (not necessarily consecutive) will constitute triggering of Stanford's full payment of fair share mitigation funds for all Tier 2 intersection improvements for which Stanford has not already made payment to the respective jurisdictions. c) "Fair share" should be based on all Stanford traffic using a particular intersection (i.e., existing and new traffic) - not just the project component from the new GUP. d) If a third year of failure to meet the TDM requirements occurs, Stanford will not be permitted to conduct further development projects permitted under the GUP that have not already been approved for construction by the County. e) Reinstatement of development rights will occur following two consecutive years of successfully meeting the "no net new commute trips" requirement. f) For Palo Alto and Tier 2 intersections for which fair share funds are received per item (b) above, Palo Alto has identified the a list of possible "alternative mitigation measures" for which the funds should be spent and/or for which Stanford should be responsible. This list may be modified by Palo Alto or the County.

The County appreciates suggestions for the monitoring program and may include any or all of them in the program as it deems appropriate. It should be noted that mitigation TR-5D already contains the provision that intersection improvement funds provided by Stanford to a local jurisdiction may be used by that jurisdiction to pay for the specified improvement, or any other program that may benefit that intersection, including trip reduction measures such as those listed by the City of Palo Alto. Furthermore, as noted in the Responses to Comments 54-2, 65-2, 92-4, 94-43, 94-64, and discussion of mitigation measure TR-5D on page 4.4-98, there should be greater flexibility in the design of intersection improvements at the time that those improvements are triggered. The text of mitigation measure TR-5D has been changed to provide for greater flexibility and the ability to designate alternate mitigation measures.

Comment Summary: The comment states that the impact of the GUP extends beyond the peak hour impacts specified in the Draft EIR. These impacts are increased traffic congestion and impacts during the non-peak hours on major streets and, in some cases on local residential streets. As mitigation for these impacts, Stanford should be required to implement an "Integrated Transportation Plan."

Refer to Response to Comment 94-32.

COMMENT LETTER 95, JANE MARK, PARK PLANNER, PLANNING AND DEVELOPMENT, COUNTY OF SANTA CLARA ENVIRONMENTAL RESOURCES AGENCY, 8/7/00

Response to Comment 95-1

Comment Summary: The comment states that mitigation OS-3: Improvement of Parks and Dedication of Trails requires greater clarification, including trigger mechanisms that would initiate the implementation of trail easement dedication, and details regarding trail construction, maintenance, and operation.

Requirements for park and trail improvements will be enforced through the Community Plan and conditions of approval of the General Use Permit. The source for funding park improvements and maintenance are outside the authority of the County to determine.

Response to Comment 95-2

Comment Summary: The comment states that the Draft EIR should include a time period for the phased dedication of trail easements and construction of the trail segments. Specifically, the County should require a portion of the trail easement and construction within one year after GUP approval and the remaining amount by the time 50% of the GUP development has been completed.

Refer to Response to Comment 95-1.

Response to Comment 95-3

Comment Summary: The comment states that the Draft EIR should include language that requires Stanford to construct and maintain the trail corridors.

Refer to Response to Comment 95-1.

COMMENT LETTER 96, ARLINDA HEINECK, CHIEF PLANNER, CITY OF MENLO PARK, 8/7/00

Response to Comment 96-1

Comment Summary: The comment requests that the County analyze the CP/GUP in terms of sustainability.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The CP/GUP proposed by Stanford and analyzed in the Draft EIR does represent Stanford's projections of its needs. The purpose of the Draft EIR is to evaluate the environmental impacts and identify mitigation measures for those impacts. This impact analysis helps determine whether or not the proposed project represents a sustainable level of growth.

Based on both the findings of the Draft EIR and the additional analysis of policy issues undertaken by County staff, the County Planning Office has released a preliminary staff recommendation on the Community Plan. This version of the Community Plan identifies policies and implementation recommendations that reflect the perspective and priorities of the County.

Response to Comment 96-2

Comment Summary: The comment states that the CP should delineate what public benefits Stanford is providing.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The concept of "public benefit" can be interpreted in a variety of ways. Measures that might be considered a benefit by some might not be considered appropriate or sufficient to qualify as a benefit by others. A requirement that Stanford provide public benefit in exchange for increased density on the central campus, and the form that benefit might take, are policy considerations that will ultimately be decided by the Santa Clara County Board of Supervisors.

Response to Comment 96-3

Comment Summary: The comment states that the CP/GUP should balance Stanford as a community asset against the burdens in places on Menlo Park.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The policies and implementation recommendations in the CP and the conditions of the GUP are intended to minimize or mitigate impacts of the approved development on the surrounding communities.

Comment Summary: The comment states that the CP should include provisions for continuing public input.

Refer to Master Response 1, Statement for or Against the Project or Project Components. Any process for ongoing public input is a policy consideration that will ultimately be determined by the Santa Clara County Board of Supervisors

Response to Comment 96-5

Comment Summary: The comment states that the CP should have a permanent cap on building square footage and population.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The preliminary staff recommendation on the CP does not identify a permanent limitation on building square footage or population. It does identify a threshold intensity for the central campus which must be reached before expansion of the Academic Growth Boundary can be considered.

Response to Comment 96-6

Comment Summary: The comment states that the AGB does not provide sufficient restraint to growth pressures.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 9, Additional Open Space Protection.

The preliminary staff recommendation on the Community Plan does not provide for review and adjustment of the AGB after five and ten years. The concept of the AGB is to promote concentration of development in the central campus over time; the preliminary staff recommendation identifies an intensity of development which must be reached within the central campus before relocation of the AGB can be considered, and states that the AGB should stay in place for 25 years. Any additional development beyond the GUP would be subject to County review and approval.

Response to Comment 96-7

Comment Summary: The comment states that the CP/GUP lacks sufficient specificity and detail.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 10, Community Plan Description of Density and Intensity of Development.

Many traditional planning and land use control techniques do not lend themselves to application at Stanford. For example, mechanisms such as Floor Area Ratio (FAR) provide a means to equitably determine allowable building area for a variety of parcels of different sizes; Stanford has few defined parcels, making application of a concept such as FAR difficult and inadequate to serve the purpose of development regulation. Recognizing the particular challenges of regulating development at Stanford, the County has chosen to develop land use control policies and mechanisms that will be appropriate to serve its purposes.

The County has recognized the need for more specificity with regard to development and has attempted to achieve an increased level of certainty with regard to the amount and type of development, while still providing the ability for Stanford to respond to unforeseen circumstances in its individual development projects. Also refer to Responses to Comments 66-4 and 66-11.

Response to Comment 96-8

Comment Summary: The comment states that the CP should include a comprehensive reporting structure for all Stanford lands.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 10, Community Plan Description of Density and Intensity of Development.

The purpose of the CP is to provide a framework for decisionmaking by the County regarding development on Stanford lands in unincorporated Santa Clara County. The CP policies are based on the particular combination of use types that exist and will continue to exist on these lands. The CP is not meant to be a comprehensive plan for all Stanford-owned lands, for which aggregate reporting of all uses would be relevant.

Response to Comment 96-9

Comment Summary: The comment states that the CP should include an independently verified annual monitoring procedure.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Use of an independent and verifiable annual monitoring procedure may be incorporated into the conditions on the GUP.

Response to Comment 96-10

Comment Summary: The comment states that the CP should be modified to be consistent with the Palo Alto Comprehensive Plan.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

According to the 1985 Land Use Policy Agreement, and as reflected in the existing and proposed Santa Clara County General Plan policies, development at Stanford is not required to be consistent with the Palo Alto Comprehensive Plan.

Comment Summary: The comment states that the CP should establish that Stanford is responsible for all fees and costs associated with future development on its lands.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Issues related to fees and costs may be addressed in detail in the conditions of the General Use Permit. The County intends that Stanford will bear all costs associated with its development to the extent allowed by law.

Response to Comment 96-12

Comment Summary: The comment states that the CP/GUP should contain a specific and defined commitment to permanent open space.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 9, Additional Open Space Protection.

The preliminary staff recommendation on the CP defines a 25-year time frame and an intensity threshold that must be achieved before the location of the AGB may be adjusted. Mechanisms for protecting open space on Stanford lands are a policy consideration that will be decided by the Board of Supervisors.

Response to Comment 96-13

Comment Summary: The comment states that land west of Junipero Serra Boulevard should be preserved as it currently exists.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 9, Additional Open Space Protection.

Any potential development on land south of Junipero Serra Boulevard would involve academic uses. Both the proposed CP and the preliminary staff recommendation on the CP limit allowable uses in this area compared to what may currently be approved. The preliminary staff recommendation also reduces the size of the area that would be designated "Academic Campus" as compared to the Stanford proposed CP.

Response to Comment 96-14

Comment Summary: The comment states that the CP should specify the extent and location of open space and natural resources and include provisions for dedicated open space and long-term protection of natural resources.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 9, Additional Open Space Protection.

Both the Stanford proposed CP and the preliminary staff recommendation on the CP contain three land use designations for areas intended to remain undeveloped, including one designation within the central campus and two designations for lands outside the AGB. Both the Special Conservation and the Campus Open Space designations would allow for essentially no development in recognition of the specific factors limiting development potential on these lands.

Response to Comment 96-15

Comment Summary: The comment states that the CP should include an analysis of housing needs.

Housing needs are evaluated in the population and housing section (Section 4.3) of the Draft EIR.

Response to Comment 96-16

Comment Summary: The comment requests that the CP/GUP include performance standards for minimizing potential impacts and references Comment 96-31 regarding traffic monitoring.

Refer to Response to Comment 96-31 regarding the traffic monitoring program. With regard to the performance standards referenced in this comment, the Draft EIR also includes performanceoriented standards for issues such as hydrology and housing. County staff may recommend such standards for the conditions of approval of the GUP. Suggestions for specific performance standards would be considered by the County. Also refer to Response to Comment 96-8.

Response to Comment 96-17

Comment Summary: The comment states that the CP should include methods to increase the difficulty of parking.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The preliminary staff recommendation on the CP incorporates maintenance of the current parking ratio on the campus. The amount and general location of parking on campus will be addressed by County staff in the conditions of approval for the GUP. The current supply of parking on the campus already presents substantial parking difficulties, resulting in some spillover parking in neighborhoods surrounding the campus.

Both the nature of the land uses and the approaches to traffic control differ substantially on Stanford lands within the County and the City of Palo Alto. Joint performance standards are not within the scope of the CP/GUP.

Response to Comment 96-18

Comment Summary: The comment requests that the CP include a more detailed Circulation Element focusing on regional traffic on Stanford roads

Refer to Master Response 1, Statement for or Against the Project or Project Components.

The County will consider the suggestions made in this comment for incorporation into the Circulation element of the CP. Because the CP is a policy-level document, such detailed technical analysis would generally not be included.

Response to Comment 96-19

Comment Summary: The comment notes that the traffic analysis was conducted by traffic consultants employed by Santa Clara County using County models, and that the analysis did rely on some data furnished by Stanford.

Data furnished by Stanford was independently reviewed for accuracy and adequacy, and was used as deemed appropriate in the analysis.

Response to Comment 96-20

Comment Summary: The comment states that the CP/GUP should include methods other than road widening as traffic mitigation.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

County staff will consider the suggestion made in this comment for incorporation into the Circulation element of the CP.

Response to Comment 96-21

Comment Summary: The comment states that the CP/GUP should incorporate specific bicycle mitigation.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Mitigation Measure TR-5B, Trip Reduction and Monitoring, allows Stanford to use measures to encourage bicycle commuting, including facilities for bicycle parking and shower facilities for bicycle commuters (see page 4.4-94 of the Draft EIR). Mitigation Measure TR-7C, Maintenance of Bicycle Access, also includes measures to ensure bicycle access within the Stanford campus.

The County does not have the authority to implement the suggestion that additional Caltrain cars that accommodate bicycles be added. County staff is recommending establishment of a universal performance standard related to transportation rather than requiring specific measures for alternative transportation modes. Such a measure could be considered under the cooperative trip reduction aspect of the proposed mitigation.

Response to Comment 96-22

Comment Summary: The City Council (Menlo Park) requests that the Draft EIR assess the CP/GUP in terms of sustainability in the broader community.

Refer to Response to Comment 96-1.

.

Comment Summary: The comment requests that the EIR include a listing of all existing levels of development and all known or planned developments on all Stanford lands, regardless of jurisdiction. This information should include building square footage, parking spaces, jobs, housing units, and population.

Refer to Response to Comment 96-8.

Response to Comment 96-24

Comment Summary: The comment states that the Draft EIR should clearly describe the relationship between projects that would fall within the parameters of the GUP and those that would require a separate use permit. The CP/GUP and Draft EIR should identify the maximum amount of building square footage contained on Stanford lands within the County's jurisdiction whether or not a separate use permit would be required.

The Draft EIR analyzes the project as proposed by Stanford. With the exception of the Carnegie Foundation project, Stanford has not at this time proposed any projects that would require separate use permits from the County. It is therefore impossible to estimate how much additional development Stanford may request under another permit.

Response to Comment 96-25

Comment Summary: The documents contain a lack of specificity or appropriate detail on which to base meaningful review or environmental analysis of the proposal. The CP/GUP should contain a refined grid or areas and uses, a map that lists uses and development guidelines for each area, another map showing where proposed building intensity will be located, and a description of the infrastructure needed.

Refer to Responses to Comments 44-11, 66-4 through 66-11, 94-18, and Master Response 10, Community Plan Description of Density and Intensity of Development. In addition, although Stanford has proposed that the distribution of building area between development districts in the GUP application be illustrative, the County may condition the GUP with regard to the distribution of development over the campus.

Response to Comment 96-26

Comment Summary: The comment requests additional detail on the proposed development for this West Campus district. How will the exact number of residential units be determined? What will be the exact location and orientation of the units? What access will be provided to the site? Will the actual residential project be subject to additional environmental review? Given the flexibility inherent in the CP/GUP, how will this District be permanently protected from any further development?

Proposed housing in the West Campus district would be located in the portion of district with the proposed designation of Campus Residential – Medium Density. At the time of application for this development, Stanford will propose a specific number of units that fall within the range

specified by the land use designation and zoning for the site. The Draft EIR assumes that the highest number of allowable units would be developed on all housing sites. As with all applications for individual building projects under the future GUP, this application would be subject to additional environmental review to a degree consistent with the particular scale and features of the proposal. No specific access has been proposed; however, access by means other than existing roadways would require construction of a new roadway across the golf course and is therefore unlikely given the amount of existing infrastructure. The remainder of this development district would remain in uses consistent with the Sand Hill Corridor Development Agreement. Academic Growth Boundary Alternative A also excludes a portion of this district from the area designated for future development.

Stanford and the City of Palo Alto have recently discussed modification of the development agreement to allow housing north of the golf course instead of on Hole #1. This site is not currently designated for faculty/staff housing. If such a use were proposed its full impacts would be evaluated at the time of application. This modification under discussion is not intended to increase the number of proposed units.

Response to Comment 96-27

Comment Summary: The comment states that in the Open Space and Academic Reserve land use designation, the CP/GUP allows for the development of low-intensity academic uses that are in keeping with the open space character of the area. No definitions are provided for the terms "low-intensity" and "keeping with the open space character". Without an adopted definition for these terms, there can be significant subjectivity in deciding if any one project meets the terms of the land use designation.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Response to Comment 96-25.

Response to Comment 96-28

Comment Summary: The comment states that the Draft EIR should include a discussion of the use of an independently verified annual monitoring procedure for the levels of change in the building square footages, population, and traffic as well as environmental and community impacts as mitigation for the impacts associated with the proposal.

Such a procedure is a component of a Mitigation Monitoring and Reporting Program (MMRP) rather than a Draft EIR. Monitoring procedures are addressed in the MMRP, which is included in the Final EIR. In addition, the County's preliminary staff recommendation for the Stanford University Community Plan specifies that the County intends to continue annual reports, but will prepare the report under its own direction rather than requiring Stanford to prepare and submit the report as occurred in the past.

Response to Comment 96-29

Comment Summary: The comment states that the Draft EIR should require more long-term open space protection, including methods such as transfer of development rights in the foothills for increased development rights in the urban core.

. . . Refer to Master Response 3, Intensified Development Alternative and Master Response 9, Additional Open Space Protection. In the preliminary staff recommendation for the CP, the County proposes an Academic Growth Boundary (Draft EIR alternative component AGB-A) that would be in place for 25 years.

Response to Comment 96-30

Comment Summary: The comment states that the Draft EIR should include a discussion of possible measures, such as a permanent commitment to open space and permanent restriction on development of office west [south] of JSB, as mitigation for identified significant and unavoidable impacts to open space.

The Draft EIR includes alternative components (LU-A and AGB-A) that would reduce open space impacts to a less than significant level. The alternative components eliminate the impact by changing the land use proposed in the CP for the Lathrop and portions of the West Campus Development Districts to Campus Open Space. These alternative components are included in the Environmentally Superior Alternative and have been included in the County's preliminary staff recommendation for the Community Plan. Also refer to Master Response 9, Additional Open Space Protection.

Response to Comment 96-31

Comment Summary: The comment states that given the CP allowances for development along the Interstate 280 corridor, what mechanisms are in place or would be put in place to protect the scenic views from the roadway.

The Draft EIR states that use permit development located within the Open Space and Academic Reserve land use designation may be visible from Interstate 280. However, without any proposals for development, it is impossible to determine whether and to what extent impacts would occur. The land use designation would allow for low-intensity academic use consistent with the open space character of the lands. Therefore, it is possible that proposed uses could result in changes to the middle ground views from Interstate 280.

Response to Comment 96-32

Comment Summary: The comment states that the Draft EIR should identify the net number of new units to clearly document the statement that there would be no loss in housing units.

Table 2-1 in the Project Description, page 2-13 of the Draft EIR, tabulates all proposed new housing, and shows the units that would be removed. The net number is shown as 2,655-3,022 in the Total at the bottom of the table. Chapter 4.3, Impact PH-1 discusses the net increase in housing units.

Response to Comment 96-33

Comment Summary: The comment states that the Draft EIR should re-evaluate the impact of new housing demands using net units and the lower faculty/staff unit counts to show worst-case scenario and then re-evaluate based on this new calculation.

The University's lower estimate of faculty/staff housing units is 318. However, thirteen singlefamily homes may be removed in the Searsville block to accommodate new graduate student housing. The net gain at Escondido Village (725 units) and the Searsville Block (237 units) has already been factored into the analysis in the Draft EIR (see Chapter 4.3, Impact PH-1). Accounting for the lower faculty/staff housing estimate would reduce the total net housing gain by 367 units. Under this scenario, the total number of faculty/staff housing units would be 1,288 at the end of ten years, or about 78% of the number of units under the highest assumption. At the higher rate of housing construction, the Community Plan would accommodate nearly all of the potential increase in faculty/staff housing demand. At the lower rate, about half of the increase the jobs-housing imbalance when combined with potential housing demand growthinducing impacts (see Chapter 5, GI-1). Provision of the low end of the housing supply spectrum would decrease impacts but increase housing-related impacts.

Response to Comment 96-34

Comment Summary: The comment states that the Draft EIR does not address the increased housing needs related to other known Stanford projects, including the cancer center proposal, Carnegie Foundation proposal and Mechanical Engineering Laboratory proposal.

As shown on page 4.3-19 of the Draft EIR, the cumulative projects include both Stanford projects that would generate employment (the Carnegie Foundation and Cancer Center), and Stanford projects that include housing (the Sand Hill Road Corridor Projects). The overall jobs housing balance at Stanford would therefore not be worsened under the cumulative condition as a result of other known Stanford projects because housing and jobs balance each other. Proposed mitigation thus fully mitigates Stanford's direct contribution to local housing needs. However, as noted in the Draft EIR, "Indirect housing demand generated by Palo Alto and Menlo Park projects would require additional mitigation by those jurisdictions." The housing linkages required in mitigation measure PH-3 are based on net gains.

Response to Comment 96-35

Comment Summary: The comment states that the Draft EIR has described that, with the completion of 480 units of new single graduate housing and 628 units approved with the Sand Hill Road Corridor projects, the University would have the potential to provide for 72% of student housing needs and 13% of faculty/staff housing needs. This would be exclusive of the Medical Center and Stanford Center and Stanford Research Park. What mechanisms are planned or included in the proposal to address the existing need?

Existing unmet housing needs related to the Stanford campus, and affected by the Community Plan, are discussed Chapter 4.3.

Response to Comment 96-36

Comment Summary: The comment states that the mitigation requiring Stanford to identify additional housing sites does not contain any implementation mechanism for the actual

construction of the identified housing site and requests an explanation of how this can be effectively implemented.

Mitigation measure PH-3 in Chapter 4-3 contains an implementation requirement that a specified number of the housing units be constructed at Stanford prior to, or concurrently with, the construction of a specified number square footage of academic space. The precise mechanism for ensuring that this requirement is met will have to determined by Santa Clara County as part of the development permit process or implementing agreements associated with the Community Plan. Implementation of construction of housing off campus is outside of the County's control. Stanford can work with neighboring communities, but implementation will in large part be under the control of those communities.

Response to Comment 96-37

Comment Summary: The comment requests that Menlo Park's plans and policies in section 4.4.A.1 be discussed.

Section 4.4.A.1 is a discussion of regional, state, and federal agencies with regards to jurisdiction over transportation planning in the study area. It does not include a discussion of individual cities, which are assumed to have jurisdiction over transportation facilities within their own city boundaries, unless specified otherwise by the discussion in section 4.4.A.1 of the Draft EIR. Neither the City of Palo Alto nor the City of Menlo Park is discussed in this section.

Response to Comment 96-38

Comment Summary: The comment states that Menlo Park has used its own derivative of the CUA and Palo Alto models and discovered omissions and distortions of the street and highway network in southern San Mateo County which could affect route choices by which traffic is projected. It is not known if these omissions and distortions have been corrected in the version of the model used in the current Draft EIR. The CUA model includes a feature to scale back peak trip-making assigned to streets to limit the peak period assigned trips to a level which reflects overall network service capacity. The concept is that the duration of the peak hour would be extended. Please include an estimate of the total long distance intra-regional and through trips omitted from the analysis in such key corridors as U.S. 101 and I-280. Also please include an estimate of the duration the peak period would be extended as a result of the scaling back procedure both with and without the Project. There are differences in projections of traffic, traffic impact, and mitigation needs between the Draft EIR and the nearly concurrent Cancer Center EIR which relied upon the Palo Alto model for its traffic projections.

The Draft EIR analysis found and corrected several errors associated with the CUA model and reviewed the results to confirm that they were logically sound.

The CUA model indeed includes a feature to better reflect reality by preventing the model from showing more cars at any given time than could physically be accommodated by the roadway network. Failure to do so would ignore important capacity constraints of the roadway network. Instead, those vehicles are assumed to use the roads at a different time, or resort to an alternate mode of transportation, which has the capacity to meet the level of demand. A distinction should be made between the peak hour (which cannot be extended) and the peak period which is any period recurring daily during which there is a noticeable increase in traffic volumes. No trips are being omitted from the analysis. Those trips merely occur at a different time of day or use a different mode of transportation. It is not possible to provide an estimate of the duration by which the peak period would be extended because there is no clear definition of the exact beginning and ending of a peak period.

Section 4.4.A.2 of the Draft EIR contains a discussion of "Consistency with Recent Analysis" on page 4.4-4. Specifically the text states that:

"The traffic analysis for the recently completed Stanford University Medical Center for Cancer Treatment and Prevention (Cancer Center) EIR did not use the same travel demand projections. That analysis updated the traffic projections first developed by the City of Palo Alto for the Sand Hill Road project. Several updates to the Sand Hill Road projections were completed in the Cancer Center analysis to account for changes that had occurred since the Sand Hill Road analysis. These projections were based on the previous land use forecasts (Projections 1998) and used the horizon year of 2003 for the buildout of the Cancer Center project.

Because two different travel demand models were used for these two separate studies, the projections will not be identical. However, the general trends of the projections are similar and the results of the analysis are consistent."

The Draft EIR text explains that there should be differences between the traffic projections of the two projects because the CUA model analysis used for the Community Plan/GUP was initiated after the Cancer Center analysis using new and different data (Projections 2000) that was not available at the initiation of the Cancer Center EIR analysis. Traffic forecasting is a dynamic process that is subject to changes in the availability and updating of data. In preparing an EIR, the lead agency must take advantage of the best and most current information available at the time of document preparation. Section 15144 of the State CEQA Guidelines acknowledges that foreseeing the unforeseeable is not possible. Therefore, each project utilized the best data available at the time that it was initiated. This has resulted in differences in the resulting traffic projections, which were entirely expected given the different analysis results. Different analysis results yield different traffic impacts, which in turn require different mitigation needs. Thus, there is no discrepancy between the analysis for the Community Plan/GUP and the Cancer Center EIR that is not legitimately based on differences in the data (Projections 2000 vs. Projections 1998) that was available at the time of project initiation.

Response to Comment 96-39

Comment Summary: The comment states that an important consideration is the way trips from new development within the GUP area are assigned to the street network. Section 4.4.A.2 indicates that these trips are assigned through the TRAFFIX software rather than through the CUA model. This may have been done in an attempt to overcome certain artificial rigidities in the CUA model regarding trip totals crossing county boundaries that are unrealistic when major developments are built very close to the County boundary. The routes used by new GUP area ٠,

traffic are directly specified by the analyst. They are not distributed by the forecast model. Routes assigned to other traffic in the CUA model are unaffected by any congestion caused by added traffic from the GUP area development. For instance the model might forecast that certain other traffic might divert to Valparaiso Avenue in reaction to added GUP traffic-created congestion on Sand Hill Road, causing as much of an impact as if newly generated GUP area traffic used the diversion route.

In fact, section 4.4.A.2 does not indicate that trips are assigned through the TRAFFIX software. That information was provided on page 4.4-63 in the trip distribution section (4.4.E.4) of the Draft EIR. As indicated in the text on page 4.4-63 of the Draft EIR, use of the TRAFFIX software allowed for modeling of different student and faculty/staff trip distributions (based on detailed zip code data of current Stanford users) which could not have been addressed by the CUA model. Additionally, use of the TRAFFIX model makes it possible to identify on an intersection level exactly which trips are associated with the project, and which are not. The CUA model cannot provide the same level of detail at study intersections.

There are three important reasons why GUP traffic was manually distributed and assigned by the TRAFFIX model. First, the CUA model lacks the ability to refine the points at which GUP trips are assigned from traffic analysis zones (TAZs) to local roads. This has the potential to underestimate the project generated traffic on links or intersections adjacent to the TAZ's. Second, as previously mentioned in Comment 96-38, the CUA model has a feature that scales back peak period trip production to account for regional roadway capacity constraints. This could result in the total number of GUP trips being reduced by the CUA model resulting in an underestimation of the project impacts. In order to maintain a conservative (worst case) analysis the TRAFFIX model was used to be sure that the full GUP trip generation would be assigned to study area roads even if the reality may be that fewer GUP trips are ultimately made due to the increases in background congestion. Third, as indicated in this comment, the CUA model may shift trips to a less congested route in response to added CUA trips. Given that the City of Menlo Park has a policy prohibiting improvements that add roadway capacity, it is likely that the less congested route to which the CUA model would assign traffic might well not be in Menlo Park. This potential shift of traffic away from Menlo Park seems entirely consistent with the end objectives of the City of Menlo Park policies against roadway capacity increases. For example, traffic that this analysis has assigned to Sand Hill Road and Alpine Road, might well be shifted by the CUA model to Page Mill Road. This would result in an underestimation of the potential traffic impacts in the City of Menlo Park. Once again, in order to maintain a conservative (worst case) analysis the TRAFFIX model was used to be sure that the impacts of GUP trips would not be underestimated as a result of traffic shifts that might be imposed by the CUA model.

Response to Comment 96-40

Comment Summary: The comment states that Section 4.4.B describes the existing transportation setting. The paragraphs on transit service include the "Menlo Marguerite" (page 4.4-11) but fail to mention that Stanford is actively considering withdrawing this service. Figure 4.4-3 illustrating bicycle facilities represents the Alma Bike Bridge in a confusing manner, giving the impression that it also provides a grade separated crossing of the Caltrain line rather than just San Francisquito Creek. Please address these matters.

Most transit providers regularly evaluate their operations and consider making changes to routes and services. However, until these changes are made or scheduled, they are assumed part of the future conditions. As indicated by the comment, section 4.4.B describes the existing transportation setting at the study was initiated, not the potential future conditions being considered by transit providers. Given the scale of the study area map in Figure 4.4-3, it is difficult to clearly depict every detail of the bicycle facilities. It should be noted that the bridge crosses San Francisquito Creek, not the Caltrain tracks.

Response to Comment 96-41

Comment Summary: The comment states that the section on TDM asserts that "the effectiveness of TDM measures improved by 62 percent between 1987 and 1998. However, the text fails to that most of the success of the program was realized in the first three years of the old GUP between 1989 and 1991, when fully two thirds of the increase in TDM effectiveness was realized. A comparison of Table 4.4-4 to Table 4.1-6 (which shows a history of campus development under the 1989 GUP) leads to the conclusion that since 1991 the TDM program has not kept pace with development. Stanford University's assertion of meeting its "no net new trips goal" reproduced as Table 4.4-5, may include taking credit for Marguerite rides internal to Stanford Lands and fail to account for peak period trips to/from campus sites by individuals housed in new on-campus housing. The table also fails to indicate that the current formula for computing campus population yields a lower total than the formula used for the base year of the 1989 GUP EIR. For these reasons the representation in Table 4.4-5 that Stanford has met and exceeds its goal of no net new trips over the lifetime of the 1989 GUP may be incorrect or optimistic.

The TDM measures affect all trips to the campus including those to existing facilities built before 1989, not just newly built facilities. Thus, a comparison of the rate of TDM growth to the rate of development growth after 1989 is not a meaningful measure of the effectiveness of TDM measures.

The information contained in Table 4.4-5 includes nothing to imply a lower total campus population for the existing year (1999) than for 1989. To the contrary, the table shows that the existing campus population is greater than the 1989 population by 1,051 persons. This is entirely consistent with the development and growth that has occurred as part of the 1989 GUP.

Response to Comment 96-42

Comment Summary: The comment states that no account is taken of the incremental traffic in surrounding communities caused by the new occupants of housing vacated by Stanford people in favor of on-campus housing. The character of a general population who would replace Stanford people in vacated of-campus housing is one that makes more trips, longer trips, and more automobile trips. Hence, housing on campus, while it may reduce traffic counts at a cordon drawn around Stanford lands, would have a detrimental traffic impact in surrounding communities.

As indicated in the Response to Comment 94-40, the off-campus housing units likely to be vacated by Stanford graduate students and occupied by new residents would be located primarily beyond the boundaries of project study area, as supported by the zip code based trip distribution

data discussed on page 4.4-60 of the Draft EIR. Therefore, although there would be new trips made to and from those units, such trips would not be associated with Stanford and there is no way to predict whether they would enter the study area. The trip pattern of these residents is speculative and cannot be determined with any accuracy. It is also important to note that graduate students do not necessarily generate substantially fewer or shorter automobile trips than the general population. In fact graduate students with more flexible work and school schedules may have opportunity and cause for more automobile trips throughout the day than some members of the general population.

Response to Comment 96-43

Comment Summary: The comment states that the trip generation analysis presumes what appear to be unreasonably low rates of peak travel to/from off-campus sites by campus-resident personnel and requests documentation of the basis for the assumptions regarding this portion of the trip generation in the Draft EIR or revision of the assumptions to more reasonable levels.

As described in section 4.4.E.1 on page 4.4-52 of the Draft EIR, the travel demand rates for various Stanford land uses were determined on the basis of a detailed cordon count and subsequent study conducted by Stanford's consultant and reviewed by the County's consultant. Thus, the trip rates are based on actual observations including travel by spouses and dependents. The proposed changes in the number of on-campus family housing units would not change the rate of trip generation for each individual unit. It is the nature of such trip rates to be the number of trips per unit of the specified type. Determination of the total number of trips is simply a matter of multiplying the trip rate by the number of units.

Response to Comment 96-44

Comment Summary: The comment states that since the land use plan considered in the analysis is only exemplar and Stanford would have broad discretion as to where to locate developments within the GUP the actual traffic experienced in particular areas surrounding the campus could be substantially different than projected for the intersection analysis. As a result the impacts and mitigation measures could be quite different than forecast in the Draft EIR.

Many of the mitigation measures (such as the trip reduction and monitoring programs outlined in TR-5B) are not sensitive to the exact location of GUP component projects. Mitigation measure TR-6B on page 4.4-107 of the Draft EIR, directly addresses this issue. Specifically, it states that Stanford shall be required by the County to prepare site-specific traffic studies for certain projects allowed in the GUP development. These traffic studies will address in detail the traffic generation, trip distribution, project access, safety and the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities as deemed appropriate by the County Planning Office. Appropriate mitigation measures will be developed in the study, conditioned through the County review and approval process, and implemented by Stanford to reduce any new or potentially more severe significant impacts. The County has the discretion to condition distribution of Stanford's development under the GUP.

Comment Summary: The comment states that the analysis shows significant project impacts at eight Menlo Park intersections in the PM peak hour and six in the AM peak hour. The impact at El Camino Real/Middle is particularly noteworthy. This intersection is shown operating at LOS D just above the threshold for LOS C in the existing condition. As Table 4.4-23 shows, it deteriorates to LOS F in the 2010 No Project and Project Conditions.

The comment is correct that the project would impact eight Menlo Park intersections, as stated in the analysis of impact TR-5 on page 4.4-90 of the Draft EIR. However, although there is a change from an existing LOS D to a 2010 No Project LOS F at El Camino/Middle, this is not a project generated impact. It is a result of background growth not associated with Stanford. The impact as shown in Table 4.4-23 on page 4.4-67 of the Draft EIR, is the increase in intersection delay by more than 0.5 seconds for an intersection already operating at LOS E or worse. Specifically the delay at that intersection during the PM peak hour would increase by 1.4 seconds as a result of the project.

Response to Comment 96-46

Comment Summary: The comment states that a system analysis is also performed for the Sand Hill/Santa Cruz/Alpine/Junipero Serra confluence as an integrated complex. The systems analysis shows the counterintuitive result of the complex operating with less delay as a single intersection than if the two parts of the complex were far enough to operate as a single intersection. Menlo Park's practical experience in its efforts to operate this complex as a system has been that the actual system's operation is somewhat worse.

As is noted, the Draft EIR analysis used two methodologies to assess traffic operations at the intersections of Sand Hill Road/Santa Cruz Avenue and of Santa Cruz Avenue/Alpine Road/Junipero Sera Boulevard. The purpose of using TRANSYT-7F to analyze the intersections was to determine the operations of the two intersections as a system, rather than as isolated intersections. In a system each intersection influences the operations of other adjacent intersections in the system. In particular, when analyzed as isolated locations, no benefit is recognized for traffic progressing through both intersections without stopping at both. Therefore analysis of these intersections as a system reaches similar conclusions while showing slightly better operations due to progression.

The primary difference between analyzing a system of closely spaced intersections and a series of isolated intersections is the way in which traffic arrival patterns are considered. These arrival patterns influence the progression of traffic through a system. Traffic arrival patterns on a given roadway may fall into various categories ranging from completely random to highly ordered. In particular, vehicles may arrive independently of one another with the spacing between vehicles following a random pattern. As traffic volumes rise this random pattern would approach a uniform but loosely spaced arrival pattern. The other extreme of traffic flow patterns, is for vehicles to arrive in closely packed platoons or groups alternating with times during which almost no vehicles arrive.

Platoons are commonly formed when a group of vehicles stopped at an upstream red light are discharged together during the green phase. Over a long distance the platoon will tend to disperse as faster moving vehicles get farther ahead and slower moving vehicles lag behind. Other vehicles may leave the platoon by turning onto cross streets or driveways. Over a distance of many miles a platoon would be likely to disperse into a random flow as both ends of it overlap with the ends of other platoons. In the case of closely spaced intersections platoons from one intersection may arrive at the next intersection relatively intact. The arrival of vehicles in platoons can have a substantial effect on the progression of traffic through the system of intersections.

The effect of platoon arrivals on intersection operation depends on the signal phase during which the platoon arrives. A platoon arriving at the beginning of a red phase will be stopped for the maximum amount of time resulting in longer delays at the intersection. This would be a case of poor progression. On the other hand, platoons arriving at the beginning of the green phase would tend to pass through the intersection without having to stop, thus reducing the delays for the intersection. This would result in optimal progression.

The isolated intersection analysis method does not calculate the vehicle arrival type from adjacent intersections. The isolated intersection analysis method uses an average arrival type to determine the effects of progression. However, by analyzing both intersections as a system, TRANSYT-7F determines the arrival types and progression between the two intersections based on intersection spacing and signal timing. In this case the analysis shows that there would be better than average progression, resulting in lower delays than suggested by the isolated intersection analysis method.

The results of the TRANSYT 7-F analysis could be used to modify the input assumptions of the isolated intersection analysis by assuming a better than average arrival type. Changing this input parameter could cause the results of the isolated intersection analysis to more closely match the results of the TRANSYT-7F analysis. However, for consistency with the assumptions used to analyze other intersections this was not done.

The analysis is technically correct and consistent with standard engineering practice.

Response to Comment 96-47

Comment Summary: The comment states that another noteworthy observation is the projected change in delay at Sand Hill Santa Cruz. In the existing condition, average delay per vehicle is estimated at about 34 seconds in the AM and 53 seconds in the PM. In the 2010 No Project condition these delays would increase to about 73 seconds in the AM and 154 seconds in the PM. The results in Table 4.4-23 illogically show that addition of GUP project traffic significantly decreases average delay to about 137 seconds in the PM, a result that appears to be in error. Even with proposed mitigation, which involves the Sand Hill Road widening and additional lanes at the intersection, text on page 4.4-100 indicates that delay would be reduced to about 63 seconds in the AM and 112 seconds in the PM, both still in the LOS F range. Hence, the Draft EIR, though not making this point demonstrates that if the traffic impacts at this location of overall planned developments of the Stanford lands are to be mitigated, something far more than the mitigation measures identified in the Draft EIR must be considered.
Refer to Response to Comment 96-45. No Project conditions are not associated with the project and are not relevant to the determination of project impacts. Project impacts are identified by comparing the No Project and Project scenarios for a given year (in this case, the year 2010). Similarly, mitigation of a project impact is only required to offset the impacts created by the project, not 10 years of background growth that are unrelated to the project. In particular, any mitigation measures for impacts identified in the 2010 Project scenario must only return intersection delays to levels equal to or less than those in the 2010 No Project scenario. The mitigation measure identified for this intersection successfully reduces intersection delays to less than without project levels. Thus, the Draft EIR indicates that the proposed mitigation measure is adequate and the comment that "something far more" would be needed is incorrect.

The result of the PM peak hour calculations was checked during preparation of the Draft EIR and confirmed to be correct. It is possible though not common for the average critical delay at an intersection to decrease as a result of additional traffic at the intersection. The reason for this is that the weighted average delay at an intersection can decrease at the same time that the total delay increases if more traffic is added to a low delay approach. This increases the weighting of the lower delay thus decreasing the weighted average for the intersection as a whole.

There is an additional factor that contributes to the decreased delay at this intersection because of the method used to calculate average critical delay for an intersection. The Santa Clara County CMA sets standards for traffic analyses. At the time this analysis began, and continuing through the present time, the CMA requirement is to use critical movement delay.

Average delay and average critical delay are two methods of determining the LOS of an intersection. They use exactly the same method of calculating delay for each movement at an intersection. However, each method summarizes the delay values for a different set of movements. Both methods are described below.

The whole intersection average delay method determines the average delay per vehicle for all traffic at an intersection. This is done by first identifying the average vehicular delay for each movement (i.e., northbound left, northbound through, etc.). Next the total delay for each movement is determined by multiplying the average delay for that movement by the corresponding hourly traffic volume for the movement. The total delay for all movements is added up and divided by the total hourly traffic volume for the entire intersection. The result is the average delay per vehicle for the entire intersection.

The average critical delay method is similar in most respects to that described above, except for the way that it summarizes the calculations. Instead of providing the average delay experienced by all traffic at the intersection, this method averages only the delay on critical movements. Critical movements are those conflicting movements with the highest combined volume to capacity ratios. Determination of critical movements is based on the methods developed as part of the Transportation Research Board Circular 212. Conflicting movements are any two movements for which vehicles can not simultaneously move through an intersection. An example of conflicting movements would be northbound left turns conflicting with southbound through traffic since these vehicles cross paths and must pass through the intersection separately. On the other hand, northbound left turns do not conflict with westbound right turns since the paths of these two movements do not cross in the intersection. Non-conflicting movements may .

pass through the intersection simultaneously. Of all movements using a given signal phase, the one with the highest (critical) volume to capacity ratio is considered the critical movement for that phase. The average critical delay for the intersection is then calculated using only the delay values and traffic volumes of the critical movements. Thus, this method uses only the delays of the worst approaches causing the average critical delay to be a higher number than the average delay, even though both methods use the same delay values for individual approaches.

Because the delay for the intersection is based on critical movements, it is possible as occurred in this case for the addition of traffic to cause a change in the critical movements at the intersection. In this case the change was to an approach with a lower average delay, thus resulting in the conclusion that the addition of project traffic decreased the average critical delay for the intersection.

Response to Comment 96-48

Comment Summary: The comment states that the Draft EIR indicates that because of the potential for surplus parking to undermine trip reduction efforts, total parking may be limited to 2,267 new stalls which maintains the existing ratio of parking spaces to campus population. Siting of parking supply does not unduly weight parking provided toward the Menlo Park side of campus but could still become a concern as Stanford would be free to reallocate locations of uses within the GUP area in the future.

While there is some freedom to reallocate uses within the GUP, most large projects including the arena expansion and performing arts center are relatively well defined in terms of location and would of necessity affect the location of new parking, so that it would remain primarily as it has now been proposed. The County has the discretion to condition the distribution of parking under the GUP.

Response to Comment 96-49

Comment Summary: The comment states that Section 4.4.F analyzes the proposal to extend Campus Drive West to Alpine Road, and shows dramatic improvement to the Alpine/Junipero Serra/Santa Cruz intersection. However, the assessment is confounded by the apparent error in the 2010 With Project computation for Sand Hill/Santa Cruz. The analysis may not fully reflect the benefits of altered travel routes that the extension would make possible.

As indicated in the Response to Comment 96-47, the analysis of the Sand Hill/Santa Cruz intersection was checked prior to completion of the Draft EIR and confirmed to be correct. Traffic was shifted from this location to the new roadway. However, the average critical delay methodology once again obscures the overall effects of the improvement. The reason that this intersection does not show the improvement that would be expected in conjunction with the shift of traffic to the new road is that the substantial volume of traffic removed from this intersection does not come from any of the critical movements used to calculate the average critical delay for the intersection. Thus, even though the volume and total delay at this intersection do in fact decrease substantially the average critical delay coincidentally remains the same.

Response to Comment 96-50

Comment Summary: The comment states that the freeway impact analysis failed to consider the segments of 101 between Willow and University and between Willow and Marsh. It is true that the analysis as conducted indicated very small increments of project traffic on the segments of 101 that were analyzed and this would have probably also been true of the segments of 101 north and south of Willow. We doubt that even if corrections were made to the CUA model, that significant freeway impacts would be found on the unstudied sections.

The County concurs with the statement that significant freeway impacts would not likely be found on other segments of U.S. 101.

Response to Comment 96-51

Comment Summary: The comment states that significant impacts are found at 17 intersections, eight of which are in Menlo Park. Although mitigation measures are identified for Menlo Park intersections in TR-5D, none of the Menlo Park intersections are affected by TR-5A, which are the Tier 1 improvements. The Draft EIR notes that the County has no authority to require that the mitigation measures in Menlo Park be carried out. The Draft EIR identifies that because Stanford will provide only a fair share portion of mitigation funding, because other jurisdictions must consent to implementing the mitigation measures, and the County cannot mandate trip reduction measures, the intersection impacts must be classified unavoidable.

It should be noted that in addition to having the most impacted intersections, Menlo Park has the most stringent impact standards resulting in impacts at some locations that would not be considered impacts using the impact criteria of other jurisdictions. The comment correctly states that all of the intersection improvements in Menlo Park are Tier 2 improvements that would not be implemented unless Stanford fails to meet the "no net new commute trips policy" established in mitigation measure TR-5B. Even so, implementation of the specified Tier 2 mitigation measures could not be guaranteed unless Menlo Park agrees to build the improvements and secure adequate funding to pay for the costs beyond those covered by Stanford's fair share contributions. However, it should be noted that Menlo Park may accept the fair share contribution and use it towards trip reduction or other programs that may benefit the impacted intersections.

Response to Comment 96-52

Comment Summary: The comment states that the proposed monitoring method for mitigation TR-5B is responsive for Menlo Park's request for such a system. There may be potential loopholes in the adjustments for parking in the Quarry lots and for Medical Center traffic use of Campus Drive West and changes in cordon station location from addition of new roadways. In addition the monitoring system is limited to traffic generation for the GUP area. There is no overall monitoring for the total traffic generated by Stanford lands overall.

The County would be in charge of the monitoring process and would approve the cordon line and the exact method used to conduct the monitoring program. This should prevent loopholes and

allow for any adjustments to the cordon line deemed appropriate by the County. The purpose of the monitoring is to evaluate traffic generated within the GUP/CP area.

Response to Comment 96-53

Comment Summary: The comment states that Mitigation TR-5C involves cooperative trip reduction and crediting Stanford's "no net new trips" achievement for participation in programs that reduce trips in the area surrounding the campus. A potential inequity would be if the "cooperative reductions" were to be concentrated on one side of campus rather than evenly distributed.

As indicated in the text of mitigation TR-5C on page 4.4-97 of the Draft EIR, Stanford's participation and eligibility for any credits would be subject to review and approval by the County Planning Office. Thus, the County would have the opportunity to ensure an even distribution of the benefits of cooperative trip reduction, and determine the equitable level of credits that may be claimed by Stanford for participation in such programs.

Response to Comment 96-54

Comment Summary: The comment states that the Draft EIR statement that "There is no data showing a relationship between Stanford traffic and cut through traffic on neighborhood streets" may lead the reader to infer that Stanford does not cause any cut-through traffic. The TRAFFIX model may not show cut-through traffic unless the analyst has defined paths through neighborhoods. The CUA model has insufficient details on residential roads preventing it for adequately modeling cut through traffic. The Draft EIR indicates that there may be some Stanford cut-through impacts and that they would be mitigated through mitigation TR-6A. First the measure passes the burden of determining Stanford's cut through traffic on to local communities. Second it is difficult to reach consensus on how to achieve mitigation. There is no guarantee that Stanford's participation will result in implementation of an acceptable mitigation. Therefore this impact should be categorized as significant and unavoidable.

It is not the intent of mitigation TR-6A to use TRAFFIX or the CUA model to determine cutthrough traffic. As with the monitoring program direct observations or any methods approved by the County and the neighborhood would be used to determine the cut-through traffic. The burden of determining Stanford traffic is not placed entirely on the neighborhoods. Rather, Stanford would contribute to funding such an operation through the direction of the County. Based on its role in the process, the County would be arbiter of selecting mitigation measures. Thus, this impact can be mitigated as identified in the Draft EIR.

Response to Comment 96-55

Comment Summary: The comment states that Mitigation measure TR-6B would require sitespecific traffic impact studies for large projects within the GUP development. No objective definition of "large" is provided, although examples of some large projects are given. Nothing in this measure would affect a situation where implementing projects in small sized increments, might concentrate much more of the GUP development in a particular sub-area or adjacent sub areas than envisioned in the Draft EIR development scenario, resulting in more extensive and concentrated traffic impacts near the land use concentration. Hence, the impacts should be regarded as significant and unavoidable.

As indicated in mitigation measure TR-6B, the County Planning Office will have the authority over the implementation of this mitigation measure. The County will have the opportunity to determine which projects or combination of projects within the GUP will be considered large. The addition of projects in small sized increments would not result in any unreported impacts to intersections in Menlo Park. These impacts are evaluated and mitigation required through the GUP EIR.

Response to Comment 96-56

Comment Summary: The comment states that the Draft EIR recommended adding a second westbound right turn lane at the intersection of Campus Drive West/Junipero Serra Boulevard. The Cancer Center EIR, recommended adding a southbound left turn lane as the appropriate mitigation. It is unclear how this inconsistency in mitigation proposals will be addressed.

The analysis indicated that the mitigation recommended by the Cancer center would not offset the impacts associated with GUP traffic. Therefore, a different and adequate mitigation was identified as a Tier 2 intersection improvement for this project. The mitigation recommended by this report does not supercede the mitigation recommended by the Cancer Center. Therefore, each mitigation measure may be constructed as required in conjunction with approval and construction of the corresponding development project.

Response to Comment 96-57

Comment Summary: The comment states that Mitigation measures TR-7A through TR-7H are concerned with construction impacts on transportation, but there is no consideration of the impacts on congestion of peak period travel by construction workers. Figure 4.4-17 shows such a limited network of truck routes that a truck U.S. 101 or east of it could not reach the GUP on a truck route without travelling as far north as Woodside Road or as far south as San Antonio Road. Given the out of direction travel required by the very limited truck route network, extensive deviation from truck routes is likely. Hence this impact should be classified as significant and unavoidable.

Mitigation measure TR-7D provides for the project sponsor to prohibit or limit the number of construction workers arriving or departing the site during the peak hour. Mitigation measure TR-7H also provides for a construction impact mitigation plan that will provide details of construction employee arrival and departure schedules, which can be designed to keep construction employees off the road during the peak hour. As indicated in the Responses to Comments 92-7 and 92-8, it is recommended that the County require Stanford to include in its construction contracts a clause requiring the contractor and its sub contractors to follow the truck route policy as defined by the construction management plan for each project. The contract clause would also stipulate a penalty or fine for each infraction involving use of non-truck route streets by trucks associated with the project. The construction management plan for each project would also identify the mechanism by which infractions would be observed or reported.

Response to Comment 96-58

Comment Summary: The comment states that while the 2010 traffic analysis does evaluate the cumulative condition, the only intersection mitigation measures considered are mitigation measures solely of the GUP project impacts, not mitigation measures of the cumulative condition. Furthermore, since a substantial portion of the cumulative intersection traffic impacts and mitigation needs are generated by traffic from Stanford's concurrent developments on Stanford lands, the Draft EIR should quantify Stanford's overall contribution to cumulative traffic impacts and fair share of responsibility for mitigating the full cumulative condition. Finally, many of the mitigation measures the Draft EIR assumes to mitigate the GUP projects are the same intersection measures that Stanford has relied upon to mitigate the impacts of its other concurrent development projects. The benefits of a particular mitigation may be of a scale to offset the impacts of an individual project taken alone, but not the impacts of all projects taken together.

As indicated in the Responses to Comments 96-45 and 96-47, the increase in delay between the existing and 2010 No Project conditions is not associated with the project. Nor is the project responsible for mitigating those increases in delay. Project impacts are identified by comparing the No Project and Project scenarios for a given year (in this case, the year 2010). Similarly mitigation of a project impact is only required to offset the impacts created by the project, not 10 years of background growth that are not specifically generated by the project. In particular, any mitigation measures for impacts identified in the 2010 Project scenario must only return intersection delays to levels equal to or less than those in the 2010 No Project scenario.

Comment 96-56 seemed to indicate disapproval of different mitigation measures for the Cancer Center EIR and the Community Plan/GUP Draft EIR. Yet this comment (96-58), indicates that the City of Menlo Park does not want the same mitigation measures used for different projects. There are two reasons why it is not problematic for the Draft EIR to recommend mitigation measures consistent with past projects. First, the City of Menlo Park has indicated through its policies that it will not construct some of the roadway widenings or intersection improvements that add traffic capacity. Since this specifically prevents the mitigation from being implemented by any project, the City of Menlo Park should not expect a subsequent analysis to assume that the improvement would be built and become a part of the background condition. That is why this Draft EIR has listed such mitigation measures as Tier 2 improvements that would not even be considered unless mitigation TR-5B fails to prevent the impact through achievement of its "no net new commute trip policy". Mitigation measures in other areas that are expected to be built have been included in the future background conditions as appropriate. Second, as indicated in the Responses to Comments 54-2, 65-2, 92-4, 94-38, 94-41, and discussion of mitigation measure TR-5D on page 4.4-98, the jurisdiction receiving Stanford's mitigation funds may choose to use those funds for the designated intersection modifications, for trip reduction measures that benefit the intersection in question, or for alternate mitigation measures that may be designed at the time that the mitigation measures are triggered. If intersection impacts result from more than one project on Stanford lands, it is assumed that Stanford would pay its proportional fair share resulting from all projects, as required by the jurisdictions in which the projects are located.

Response to Comment 96-59

Comment Summary: The comment states that comparison of the analysis for the Sand Hill Projects, the Cancer Center, and the CP/GUP show inconsistencies between the projections. For instance, at El Camino Real/Ravenswood the PM peak year 2000 delay projections for the Sand Hill Corridor projects is exceeded by the 1999 conditions documented by both the Cancer Center and the CP/GUP. More disturbing is the fact that the 1999 "existing conditions" in the Cancer Center and CP/GUP are different despite the fact that they were compiled by the same consultant for the same ultimate project sponsor within the same time frame. Also the year 2000 plus project for the Cancer Center and the 2000 No Project for the CP/GUP should be more or less identical yet they are different.

Model projections and actual traffic counts are different things and should not be expected to be exactly identical. As indicated in the Response to Comment 96-38, traffic forecasting is a dynamic process that is subject to changes in the availability and updating of data. In preparing an EIR, the lead agency must take advantage of the best and most current information available at the time of document preparation. Section 15144 of the State CEQA Guidelines acknowledges that foreseeing the unforeseeable is not possible. The actual rate of land use change may vary from that expected at the time that a model forecast is made. This can be the result of many unpredictable factors.

The fact that 1999 "existing" conditions in the Cancer Center and CP/GUP are different is based on the fact that some of the counts for the CP/GUP were collected more recently than those used in the Cancer Center. In particular, some counts were obtained as recently as November 1999 and April 2000, as indicated in Table 4.4-11 of the Draft EIR. These count dates are after the analysis of the Cancer Center traffic had begun. This was done in an effort to use the most current information available.

It should be noted that there is no year 2000 analysis for the Cancer Center or CP/GUP so it is meaningless to speculate if those scenarios are identical or not. It may however, have been the intent of the comment to indicate differences between the year 2010 scenarios for the two project as was done in Comment 96-38. As indicated in the Response to Comment 96-38, the Draft EIR text makes it clear that there should be differences between the traffic projections of the two projects because the CUA model analysis used for the Community Plan/GUP was initiated after the Cancer Center analysis using new and different data (Projections 2000) that was not available at the initiation of the Cancer Center EIR analysis. Therefore, each project utilized the best data available at the time that it was initiated. This has led to differences in the resulting traffic projections, which were entirely expected given the differences in the initial data. Clearly, different traffic volumes would be expected to result in different analysis results. Thus, there is no discrepancy between the analysis for the Community Plan/GUP analysis and the Cancer Center EIR that is not legitimately based on differences in the data (Projections 2000 vs. Projections 1998) that was available at the time of project initiation.

Response to Comment 96-60

Comment Summary: The comment states that at El Camino Real/Valparaiso/Glenwood there are similar discrepancies between the 1999 existing conditions as documented by the Cancer

ä.,

Center and CP/GUP and 2000 plus Project for the Cancer Center and 2000 No Project for the CP/GUP. The same pattern of discrepancies appears for the Sand Hill/Santa Cruz intersection.

As indicated in the Response to Comment 96-59, some of the counts for the CP/GUP (including those for these two intersections) were collected more recently than those used in the Cancer Center. In particular, the counts for both of these intersections were collected in November 1999, as indicated in Table 4.4-11 of the Draft EIR. These count dates are after the analysis of the Cancer Center traffic had begun. This was done in an effort to use the most current information available.

As indicated in the Response to Comment 96-59, there is no year 2000 analysis for the Cancer Center or CP/GUP so it is meaningless to speculate if those scenarios are identical or not. However, it is likely that the intent of the comment was to indicate differences between the year 2010 scenarios for the two project as was done in Comment 96-38. As indicated in the Responses to Comments 96-38 and 96-59, the Draft EIR text makes it clear that there should be differences between the traffic projections of the two projects because the CUA model analysis used for the Community Plan/GUP was initiated after the Cancer Center analysis using new and different data (Projections 2000) that was not available at the initiation of the Cancer Center EIR analysis. Therefore, each project utilized the best data available at the time that it was initiated. This has led to differences in the resulting traffic projections, which were entirely expected given the different analysis results. Thus, there is no discrepancy between the analysis for the Community Plan/GUP analysis and the Cancer Center EIR that is not legitimately based on differences in the data (Projections 2000 vs. Projections 1998) that was available at the time of project initiation.

Response to Comment 96-61

Comment Summary: The comment states that the Draft EIR does not consider development that could occur outside the areas designated Academic Campus and Campus Residential.

The development that may be proposed to occur outside of the areas designated Academic Campus and Campus Residential is not covered under the General Use Permit or the Draft EIR. The intent of the CP/GUP is to confine development to those areas. The County would have to issue a separate use permit for that development, which would require a separate environmental analysis.

Response to Comment 96-62

Comment Summary: The comment states that Mitigation Measure HWQ-3 (c) requires that Stanford not engage new land use practices that could threaten pollution of the groundwater supply and requests clarification of how this mitigation measure would be implemented or enforced, including how it would be applied to leaseholders.

All Stanford (and Stanford leaseholder) land use practices would have to comply with Santa Clara County General Use Permit requirements. Responses to this and several other comments regarding potential water quality impacts and mitigation measures have been addressed through

revision of Mitigation Measure HWQ-3 Protect Water Quality in the Final EIR. Refer to Response to Comment 2-1. Enforcement and monitoring requirements for this mitigation are presented in the Mitigation Monitoring Program.

Response to Comment 96-63

Comment Summary: The comment states that no reference is made to any programs for notification of accidental release to surrounding property owners/residents or other jurisdictions. The comment asks what procedures are in place for notifying neighbors of accidental releases and how neighboring residents are made aware of these procedures.

The local and state Hazardous Materials Business Plan requirements and California Accidental Release Program requirements are described in the Community Plan document and in the EIR. They address emergency chemical release reporting and community notification and evacuation for chemical release incidents. This is called "Area Planning" in the regulations.

As noted in Section 4.7.A.6, any releases at Stanford facilities with a potential to reach the environment are immediately reported to Stanford's local response agency, the Palo Alto Fire Department. Alarm systems at Stanford are directly linked and report to Palo Alto Central Communications and provide immediate notification to fire response units. In an incident of this type, the Palo Alto Fire Department becomes the "Incident Commander" and makes the determination about whether to warn or evacuate potentially threatened areas, both on and off campus. If the PAFD Incident Command determines that areas of the community need to be notified or evacuated they accomplish this through their pre-established procedures involving their public safety departments and those of neighboring communities or jurisdictions, as necessary.

Response to Comment 96-64

Comment Summary: The comment asserts that California tiger salamander mitigation Option 2 should be incorporated into the project since it is the superior and least damaging alternative

The County specifically developed Option 2 to allow further protection of the salamander. Also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 96-65

Comment Summary: The comment requests data on levels of pollutants compared to State and Federal air quality standards.

The requested data are provided in a new Table 4.11-3(A).

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

4.11-3(A)

Number of Ambient Air Quality Standard Exceedences and 1996-1998 Maximums

			Air Quality Standards		1996		1997		1998		
Pollutant	Units	Averaging Time	State	Federal	Exceedence ¹	Max. Value ²	Exceedence ¹	Max. Value ²	Exceedence ¹	Max. Value ²	
Redwood City Monitoring Station											
Ozone	ppm	1-hour	0.09	0.12	1	0.10	0	0.09	0	0.066	
		8-hour		0.08	• 0	0.07	0	0.07	0	0.05	
Carbon Monoxide	ppm	1-hour	20	35	0	9.0					
		8-hour	9	9	0	3.5	0	4.2	0	4.1	
Nitrogen Dioxide	ppm	1-hour	0.25	3	0	0.09	0	0.084	0	0.063	
		Annual		0.053	0	0.020	NA	0.018	0	0.018	
Particulate matter (PM ₁₀)	$\mu g/m^3$	24-hour	50	150	0	48	2	70	0	49	
		Annual Geometric Mean	30	_	NA	19.2	NA	22	NA	21	
		Annual Arithmetic Mean		50	NA	21.0	NA	24	NA	22	
Mountain View Monitoring Station — Cuesta											
Ozone	ppm	1-hour	0.09	0.12	3	0.11	1	0.114	2	0.097	
		8-hour		0.08	0	0.08	0 ·	0.08	0	0.06	
Source: California Air Resources Board, California Air Quality Data, 1995-1998											

at Monitoring Stations near the Project Area

1 Number of exceedences of the most stringent (State) standard.

2 Maximum concentration measured during the year.

3 — indicates that no ambient air quality standard has been established.

4 NA = Not Applicable

Response to Comment 96-66

Comment Summary: The comment asks if "clean air conditions" were achieved in 1999.

The question of "clean air conditions" would refer to ozone levels. According to the May-June 2000 issue of "Air Currents", the Bay Area exceeded both the national 1-hour and 8-hour standards in 1999.

Response to Comment 96-67

Comment Summary: The comment asks what specific conditions were assumed in the CAL3QHC model regarding stop sign/signal and roadway configurations.

CAL3QHC requires several parameters including roadway geometries, receptor locations, meteorological conditions and vehicular emission rates. In addition, signal timing data and data describing the configuration of the intersection being modeled is also required. The traffic consultant provided specific data such as year 2010 peak hour vehicle volumes and speeds and projected stop sign/signal configurations and timings. The air quality consultant visited the existing intersection locations to collect specific roadway dimensions. The roadway characteristics for the year 2010 were based on a combination of current roadway dimensions and projected future roadway configurations. Please refer to Appendix A for detailed modeling and intersection configuration assumptions. The Draft EIR does not assume the widening of Sand Hill Road within the City of Menlo Park.

Response to Comment 96-68

Comment Summary: The comment asks why the URBEMISg model only used information from residential units and students and did not consider increase in non-residential square footage.

The comment is incorrect in its assumption. As stated on page 4.11-15 of the Draft EIR, "stationary emissions take into account emissions from natural gas usage, landscaping, and consumer product usage (e.g. air fresheners, household cleaners, automotive products from the residential units and emissions from academic facilities." The square footage of academic facilities is considered in the modeling.

Response to Comment 96-69

Comment Summary: The comment asks how the Draft EIR determined that the CP/GUP does not contain any sources that would exceed the BAAQMD permitting threshold.

The discussion of BAAQMD permitting thresholds referred primarily to laboratory permitting requirements. Teaching laboratories used exclusively for classroom experimentation and/or demonstration and laboratories located in buildings with lab space less than 25,000 square feet or with fewer than 50 fume hoods are exempt from permitting requirements. Based on Stanford's description of proposed academic facilities, it is expected that new facilities would not likely require a BAAQMD permit. However, the Draft EIR acknowledges that Stanford may propose facilities that exceed the thresholds and states that compliance with BAAQMD's permit requirements would ensure that impacts would not be significant.

Response to Comment 96-70

Comment Summary: The comment states that the City of Menlo Parks limits on construction hours are more restrictive than those of the County or City of Palo Alto.

Table 4.12-6 on Page 4.12-15 of the Draft EIR included the construction hour restrictions mandated in Menlo Park's noise ordinance. The City's ordinance prohibits construction after 6:00 PM on weekdays. To clarify that construction adjacent to Menlo Park would be subject to greater restrictions this will also be included in mitigation.

The Draft EIR is revised as follows:

Page 4.12-18, add the following after the first bullet in the list of measures in NOISE-1:

• For construction areas with a boundary along the Menlo Park City limit construction hours would be limited to 8:00 AM – 6:00 PM, Monday through Friday, and no work on weekends and holidays.

Response to Comment 96-71

Comment Summary: The comment states that if the traffic study is revised changes to the evaluation of traffic noise will be required, and requests an explanation of why the cumulative traffic noise impact is described as de minimis.

No such changes are expected to be needed. The Draft EIR describes the basis for the statement that the project's impact to the cumulative condition is de minimis. Year 2010 predicted traffic noise levels are shown in Table 4.12-8 on page 4.12-21 of the Draft EIR. As noted there, "future noise levels between No Build and Build would be virtually identical." There are no measurable differences in the noise levels with and without the project.

Response to Comment 96-72

Comment Summary: The comment states that the new roadway alternative extending Campus Drive West to Alpine Road overstates the potential impacts because it uses an alignment three times as long as the most practical alignment and traverses more difficult topography.

In their response to the Notice of Preparation, the City of Menlo Park specifically requested that the Draft EIR evaluate "an alternative in which Stanford develops on its own lands roadway infrastructure linking the central campus to the I-280/Alpine Road intersection". The alternative shown in Figure 7-4 of the Draft EIR uses existing roads (Stock Farm Road and Campus Drive West) north of JSB, and proposes new roadway south of JSB extending from the end of Campus Drive West to the I-280/Alpine Road interchange. It is not clear from the comment how the alternative presented in Figure 7-4 of the Draft EIR could be shortened and still reach the area of the I-280/Alpine Road interchange. A much shorter alignment (as suggested in the comment) would connect to Alpine Road well north of the interchange. This would not comply with the original request of the City of Menlo Park.

A number of potential alignments of this roadway would be possible, but all would require grading and would have some extent of unavoidable impacts to oak woodland and annual grassland. A new roadway would necessarily have some lighting impacts. The alignment would

also affect the Stanford golf course south of JSB. Stanford is proposing realignment of holes north of JSB to accommodate proposed housing, which is evaluated in the EIR. Changes to the golf course south of JSB are not under consideration. The comment is correct that there are mitigation procedures to minimize water quality impacts of roadway construction and operation, but it is difficult conclude that impacts could be avoided altogether, without a detailed design plan.

The Draft EIR explains that a new roadway would open the foothills to additional growth pressures. While land use is controlled by Stanford, this does not mean that the University is not subject to growth pressures. The current CP proposes academic development south of JSB, and while the County has determined that it is environmentally preferable to restrict growth in this area, future applications for changes in land use designations may be more likely if there is a roadway through the area. Pressure for growth is thus a valid concern.

COMMENT LETTER 97, BETTY KOSKI, 8/7/00

Response to Comment 97-1

Comment Summary: The comment requests that Stanford be required to maintain the "open space" zoning for the golf course lands.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 9, Additional Open Space Protection.

Response to Comment 97-2

Comment Summary: The comment requests that Stanford seek housing sites in the core campus area utilizing the principles of "high density housing".

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

COMMENT LETTER 98, KATIE SHOVEN, 8/7/00

Response to Comment 98-1

Comment Summary: The comment requests the inclusion of a specific articulated plan in the final EIR for school commute traffic safety for our children and asks that the County identify a process in the final EIR to ensure that PAUSD, County Roads, and other relevant agencies will provide timely support to Stanford in future efforts to solve school commute safety problems as they affect the Stanford campus residential community.

As discussed in the comment, Stanford supports efforts to maintain a safe commute environment for children traveling to school on local roads. Although programs to ensure school commute traffic safety for children may be included in the neighborhood traffic studies required by mitigation measure TR-6A, the County may wish to add a separate condition for addressing such concerns linked to individual schools or school districts rather than to neighborhoods. The issues

identified in the comment are associated with current concerns, not impacts of the proposed project. The County will continue to work with the Stanford campus residents, but many of the roadways identified in the comment are maintained by Stanford and are not in the jurisdiction of the County.

Response to Comment 98-2

Comment Summary: The comment states that it is important to study current as well as potential increased negative impacts of traffic in and around the internal campus residential neighborhoods and requests that enforceable mitigation measures be included in the EIR. For example residents are subject to escalating noise and pollution from construction trucks despite truck mitigation measures in the 1989 EIR.

Refer to Response to Comment 92-5. As indicated in the Responses to Comments 92-7, 92-8, and 96-52, it is recommended that the County require Stanford to include in its construction contracts a clause requiring the contractor and its sub contractors to follow the truck route policy as defined by the construction management plan for each project. The contract clause would also stipulate a penalty or fine for each infraction involving use of non-truck route streets by trucks associated with the project. This would be used as a tool to enforce the mitigation of trucks as proposed by the EIR.

COMMENT LETTER 99, GAIL SREDANOVIC, 8/7/00

Response to Comment 99-1

Comment Summary: The comment states that Alameda de las Pulgas and University Heights area close to Stanford is heavily impacted by Stanford traffic. This area is omitted from the transportation portion of the Draft EIR, while other areas farther away are included. This is a serious omission.

The study area established for the project was developed based on previous analyses for the immediate area, requirements of the Santa Clara County CMA, the scoping sessions held for this project, and consultation with adjacent jurisdictions. No intersections in the Alameda de las Pulgas and University Heights area were identified for inclusion in the study area at that time. As these neighborhoods do not directly lie between I-280 and the Stanford central campus, GUP-related cut-through traffic is unlikely.

Response to Comment 99-2

Comment Summary: The comment states that Stanford has not constructed enough affordable housing to meet the needs of students and retired professors or maintained the affordability of some existing University-operated housing. In addition, University policies make it difficult for students to look for housing off campus.

Refer to Response to Comment 43-3. Chapter 4.3 discusses the current shortage of affordable housing and the net change in the supply of housing under the Community Plan. The status of

University policies relating to students who wish to move off-campus is beyond the scope of this EIR.

Response to Comment 99-3

Comment Summary: The comment states that the zoning practices utilized on Stanford land need to become consistent with those in its surrounding communities, and that Stanford needs to use their lands more wisely in order to stay out of the lands south of JSB.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 10, Community Plan Description of Density and Intensity of Development and Master Response 3, Intensified Development Alternative.

The comment does not provide any specific comment on the Draft EIR. Therefore, no further response can be provided.

Response to Comment 99-4

Comment Summary: The comment states that toxic waste is a little known issue associated with Stanford University. It states that there are two federal Superfund sites on Page Mill Road and nine "state-supervised toxic leach sites at the Hillview-Porter site near Junipero Serra."

There is one Federal Superfund Site on Stanford lands. It is located within the Stanford Research Park. The site is known as the Hewlett-Packard site and is located at 650 Page Mill Road (formerly 620-640 Page Mill Road). The site also includes an off-site area located at 601 California Avenue. Both the site and the off-site area are within the City of Palo Alto and are not on land within the jurisdiction of the General Use Permit and Community Plan. Groundwater beneath the site became contaminated with volatile organic compounds when a former tank at the site leaked. The most current information for the site indicates that the contamination does not extend beneath land covered by the General Use Permit and Community Plan. There are no other federally listed sites.

There are 17 State Cleanup and Abatement Orders in the Stanford Research Park and one Regional Order for at total of 18 Orders. The Regional Order covers nine of the 18 state orders. All of these orders apply to areas that are within the city limits of Palo Alto. The Regional Order is called the Hillview-Porter Regional Program.

The Hillview-Porter Regional Program includes nine sites within the Stanford Research Park, portions of the Veterans Administration Hospital Property, Matadero Creek, and the Barron Park Neighborhood. The nine sites are located at 3210 Porter Drive, 3215 Porter Drive, the Corner of Page Mill Road and Porter Drive, 3170 Porter Drive, 3400 Hillview Avenue, 3300 Hillview Avenue, 3165 Porter Drive, 3176 Porter Drive and 3333 Hillview Avenue. These groundwater plumes are within the city limits of the City of Palo Alto. The Department of Toxic Substances Control has issued Fact Sheet #18 dated August 2000 regarding the status of the regional program remediation.

A state order has also been issued for Hewlett-Packard, located at 1501 Page Mill Road. This site's groundwater investigation has been divided into five study areas. One of the study areas,

called the North West Area (NWA), covers a portion of the site and extends across Page Mill Road to off-site areas, including Peter Coutts. Four groundwater monitoring wells have been installed at Peter Coutts and are monitored on a regular basis by Hewlitt-Packard.

Other sites with historical environmental releases that are adjacent to, but not within, the county's planning area are several former service stations that had left behind waste oil tanks. The properties were located along Quarry, Arboretum and Sand Hill Road (formerly Willow Road). The waste oil tanks were removed and Stanford has received case closure from the Santa Clara Valley Water District regarding these sites. The closed sites are located at 527 Willow Road, 551 Willow Road and 480 Quarry Road. None of these sites is affected by the CP/GUP.

COMMENT LETTER 100, JEFFREY SEGALL, 8/7/00

Response to Comment 100-1

Comment Summary: The comment states that potential CP development in the Lathrop Development district would conflict with open space and natural resource uses located to the west and southwest of the district.

Refer to Response to Comment 44-6.

Response to Comment 100-2

Comment Summary: The comment states that a definition for the Academic Campus land use designation is not provided.

Refer to Master Response 10, Community Plan Description of Density and Intensity of Development.

Response to Comment 100-3

Comment Summary: The comment states that the Open Space and Academic Reserve land use designation does not define what might constitute "limited low intensity" academic use.

The Draft EIR has defined the Open Space and Academic Reserve land use designation as it was proposed by Stanford. As proposed by Stanford, the intensity and density of any development in areas with this land use designation would be established by a use permit granted by the County. Uses were only limited to those "in keeping with the open space character" and "dependent upon unique open space resources" (page 2-8 of the Draft EIR). To provide an option with more detailed definition of allowable uses, the Draft also evaluated an alternative land use designation, Open Space and Field Research. This designation is specified in alternative components LU-A and LU-C.

Response to Comment 100-4

Comment Summary: The comment states that lack of definition of intensity and density of land use designations is unacceptable.

Refer to Master Response 10, Community Plan Description of Density and Intensity of Development.

COMMENT LETTER 101, ROBERT W. FLOERKE, REGIONAL MANAGER, CENTRAL COAST REGION, CALIFORNIA DEPARTMENT OF FISH AND GAME, 8/7/00

Response to Comment 101-1

Comment Summary: The comment states that the Draft EIR does not adequately describe the acreage boundary of the CP area west [south] of Highway 280.

The comment is correct that the boundary of the CP area is described only generally in the text. The text does, however, clearly indicate that the CP boundary includes all lands in unincorporated Santa Clara County. It was determined that the specific boundary of the CP area was best depicted in a figure, and the intent of Figure 2-3 was to show the entire boundary of the CP area. Figure 2-3 does show the boundary south of Highway 280.

Response to Comment 101-2

Comment Summary: The comment states that the proposed change of land use designation from Academic Reserve and Open Space to Academic Campus for the Lathrop Development District creates significant impacts from encroachment into open space and recommends adopting alternative Academic Growth Boundary B (AGB-B).

The Draft EIR provides analysis of both open space and biological resources impacts associated with the proposed CP/GUP development and land use modifications in the Lathrop Development District. The Draft EIR concludes that open space impacts associated with the CP proposed land use designation of Academic Campus would be significant and unavoidable. Alternative land uses (LU-A and LU-B) and academic growth boundarys (AGB-A and AGB-B) have been identified that would reduce the impact. As mitigation for open space impacts resulting from the proposed 20,000 square feet of development in the Lathrop District the Draft EIR recommends clustering, which would avoid or minimize habitat fragmentation and impacts.

In addition, the Draft EIR states that 20,000 square feet of proposed development in the Lathrop District would impact California tiger salamander. In order to mitigate these impacts, the Draft EIR provides mitigation measure BIO-1(a) through (e) – Options 1 and 2 on page 4.8-32. Any subsequent development in the Lathrop District under the Community Plan land use designation would require a future GUP approval and implementation of the CP-related BIO-1 mitigation measure at a minimum. It would be speculative at this time to suggest that potential future development associated with the CP land use designation would have significant and unavoidable impacts on biological resources. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

The Draft EIR includes LU-A and AGB-A in the Environmentally Superior Alternative, as these alternative components would allow the 20,000 square feet of proposed development only in the

, *****.

•

vicinity of existing development in the Lathrop District and would prohibit any further development south of JSB.

Response to Comment 101-3

Comment Summary: The comment strongly recommends the maximum density build-out of those areas in the currently proposed East Campus, San Juan, and Quarry development areas and strongly recommends eliminating the proposed housing at the Lower Knoll, Gerona Triangle and the Driving Range

Refer to Response to Comment 39-3 regarding higher density development. Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites. Undeveloped portions of Gerona Triangle are not included in Housing Site C.

Response to Comment 101-4

Comment Summary: The comment states that the Draft EIR describes documented presence of California tiger salamander (CTS) in the proposed development areas and that these sites are located in the CTS Management Zone.

The comment is correct in stating that several areas proposed for development are within the CTS Management Zone.

Response to Comment 101-5

Comment Summary: The comment states that the California tiger salamander mitigation program is unacceptable. Mitigation fails to secure mitigation acreage in perpetuity and proposes changes in the June 1988 Management Agreement for the California tiger salamander at Stanford University without the approval of the other signatories.

The County has identified additional mitigation options because Stanford's proposal did not reduce impacts to the salamander to less than significant. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 101-6

Comment Summary: The comment requests that California tiger salamander mitigation Option 2 be incorporated into the project and proposes modifications to Option 2.

Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander. Recommendations for additional CTS protection have been incorporated into a third mitigation option. This mitigation option prohibits development of existing occupied CTS habitat located within 500 meters of Lake Lagunita, including the Lower Knoll, Gerona Triangle, and Lathrop sites. Under Option 2, the Draft EIR requires that successful breeding be documented for at least three *consecutive* years (rather than three years total) before development of the Lower Knoll, Gerona Triangle, or Lathrop district may occur. Due to the delayed breeding behavior of CTS, and the fact that breeding may not occur at all in some years due to drought or other unfavorable conditions, it is likely that it will take several years before three consecutive years of breeding can be documented. It should be noted that, because Option 2 requires dedication of easements on occupied CTS habitat within 500 meters of Lake Lagunita for any development within the CTS Management Zone, these sites are the most viable candidates for easement protection.

Response to Comment 101-7

Comment Summary: The comment asserts that BIO-1 (f)-(k) Rare, Threatened, and Endangered Plant Protection Program measures are inadequate and specifies five distinct problems with the measures.

The comment asserts that focused surveys for special-status plants are not acceptable.

The word "focused" in the context of rare plant surveys was intended to mean site-specific surveys. The Draft EIR is revised below to reflect that special-status plant surveys shall be conducted pursuant to the California Department of Fish and Game's "Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities."

The Draft EIR is revised as follows:

Page 4.8-34. BIO-1(f) is revised to read:

(f) Stanford shall retain a qualified biologist to conduct focused floristically-based surveys for special status plants following the California Department of Fish and Game's "Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities."

The comment asserts that the 30-foot buffer recommendation is insufficient.

The mitigation provides a recommended minimum, and larger buffers may be determined to be necessary based on project-specific environmental review. As the CDFG's own policy states: "Typically, buffers are established on a case-by-case basis depending on the species impacted." Since the GUP EIR is a planning level document, the following change of wording to BIO-1(g) is recommended:

The Draft EIR is revised as follows:

Page 4.8-34. BIO-1(g) is revised to read:

(g) The designated construction zone for new facilities shall be designed to provide, to the extent feasible, an exclusionary buffer from any special-status plant resources discovered (recommend a minimum 30-foot buffer, with exact size of buffer to be determined in consultation with the California Department of Fish and Game on a case-by-case basis, depending upon the species to be impacted).

The comment asserts that transplantation is experimental and prefers translocation through collection of seed and cuttings for broadcast. The comment also requests discussion of replacement ratios for impacts to special-status species habitat on a case-by-case level in subsequent project-level CEQA documents and asks that special-status plant mitigation acreage

be put into a permanent conservation easement. The comment also states that translocation and monitoring should continue until the success criteria are met.

The Draft EIR is revised as follows:

Page 4.8-34. BIO-1(j) is revised to read:

- (j) All special-status plants within the construction zone shall be transplanted (after seed and cuttings have been secured and propagated for translocation) on Stanford lands in consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service. Lost special-status plant habitat shall be replaced and/or known rare plant habitat preserved at a ratio to be determined in consultation with CDFG on a case-by-case basis, depending upon the degree of rarity of the species in question. at a ratio of two acres of replacement habitat for each acre of special-status plant habitat lost. Seed and cuttings shall be used for translocation efforts as needed to meet the minimum success criteria. Stanford shall provide for long-term protection and management of the replacement habitat, through easements or other equally protective mechanism.
- (k) Stanford shall provide funding for the County to retain a qualified biologist to monitor the mitigation sites annually for five years using success criteria developed in coordination with the California Department of Fish and Game and U.S. Fish and Wildlife Service. The success of the transplantation program shall be considered to have been achieved if 80% or more of the transplanted plants have survived five years after transplantation. <u>The translocation and monitoring shall continue until the success criteria are met.</u>

Response to Comment 101-8

Comment Summary: The comment asserts that Mitigation Measure BIO-5 Replacement of Oak Woodland and Riparian Oak Woodland mitigation ratios are unacceptable for both habitats, request adjustments to the ratios, and incorporation of permanent conservation easements into the language in BIO-5.

The mitigation measure calls for long-term preservation of habitat, which could be through an easement or other mechanism. The recommended replacement ratios are a minimum, and can be increased based on project-specific analysis, if warranted. Ratios less than 3:1 may be acceptable if mitigation areas are established in advance of removal of existing habitat. The measure further requires that restoration design, compensation ratios, and monitoring requirements be determined in consultation with the CDFG to ensure that comparable habitat values are attained in the replacement habitat. The measure, as currently written, is responsive to this comment.

COMMENT LETTER 102, BARBARA J. SCHUSSMAN, MCCUTCHEN, DOYLE, BROWN & ENERSON, LLP FOR STANFORD UNIVERSITY, 8/7/00

Response to Comment 102-1

5,00

Comment Summary: The comment states that Stanford disagrees with the Draft EIR's conclusion that approval of the proposed CP/GUP would be inconsistent with the Santa Clara County Trails Master Plan because no development is proposed that would interfere with the locations of the trail routes, and trail dedication is not mandated by the Trails Master Plan policies.

Refer to Response to Comment 95-1. The County Parks and Recreation Department states that Stanford should be required to dedicate and improve the trail corridors based upon the recreational and traffic impacts that will result from additional population associated with the buildout of the proposed GUP. Timing and responsibilities of Stanford for the trail dedication, improvement, and operation identified in mitigation measure OS-3 will be established through the conditions of the GUP.

Response to Comment 102-2

Comment Summary: The comment states that the proposed CP/GUP will preserve the majority of Stanford's land as open space and that no development is proposed in the undeveloped portions of the foothills.

The GUP proposes 20,000 square feet of development for the Lathrop District. Portions of this District are currently undeveloped. As proposed by Stanford, neither the CP or GUP provide restrictions on the use of the 20,000 square feet of proposed development. Therefore, the Draft EIR concludes that development in the Lathrop District could potentially affect undeveloped open space lands. In order to ensure that undeveloped open space lands are maintained to the greatest extent possible, the Draft EIR includes mitigation measure OS-2: Cluster Development in Lathrop Development District.

Response to Comment 102-3

Comment Summary: The comment states that the wording of mitigation measure OS-2 should be worded to encourage clustering rather than requiring clustering in all cases because Stanford may ask to build structures such as field research stations or other academic facilities that need a remote setting.

Mitigation measure OS-2 is intended to ensure that academic, athletic or administrative facilities are not spread throughout the Lathrop Development District. The CP/GUP would allow field research or other academic facilities that require a remote setting to be constructed outside of the Lathrop District. The review for these facilities will allow the County to determine whether the use requires a remote setting and whether it should be located within undeveloped open space lands.

Response to Comment 102-4

Comment Summary: The comment disagrees with the Draft EIR's assumption that the proposed Academic Campus land use designation for the Lathrop District would allow for greater future development in subsequent development proposals because the County would retain the discretion to determine how much additional development would be appropriate.

Although the use permit process provides the County with discretion regarding additional development, the General Plan designation for a location is a primary factor in determining whether or not additional development is appropriate. Therefore, the proposed land use designation of the Academic Campus, which is meant to accommodate intensive academic development, would facilitate granting of future use permits that would not be approved under a more restrictive designation. The County staff has therefore included a more restrictive land use component in the Preliminary Staff Recommendation for the CP. This land use designation would allow for the 20,000 square feet of development proposed for the Lathrop District but would change the remainder of the District to Campus Open Space (golf course) and Open Space and Field Research (undeveloped portions). The Open Space and Field Research designation would allow for field research uses that require a remote setting under a County use permit.

Response to Comment 102-5

Comment Summary: The comment states that the Academic Campus land use designation has been proposed for the Lathrop District because of the existing athletic and research facilities that are located there. Stanford requests that any land use designation in the Lathrop District recognize the continued use of the existing research facilities and golf course.

The land use alternative (LU-A) and Academic Growth Boundary (AGB-A) alternatives proposed in the Environmentally Superior Alternative of the Draft EIR would allow for the continued use of the existing research facilities and the golf course. Further, the alternative components would provide greater protection of the golf course and currently undeveloped portions of the Lathrop District.

Response to Comment 102-6

Comment Summary: The comment states that the dedication of trails is not necessary to accommodate the demand for recreational facilities caused by the projected increase in campus population because existing campus open space and recreational facilities have sufficient capacity. The comment also states that Stanford's conservation and access plan for the "Dish" area is not part of this project. The comment requests clarification that Stanford would "designate" rather than "dedicate" parks in the faculty subdivision.

The comment is correct regarding the fact that Stanford would designate rather than dedicate park lands as part of mitigation measure OS-3. This change has been made to the measure as shown in Response to Comment 1-3.

The comment is also correct that Stanford's conservation and access plan for the "Dish" area is not part of this project. However, the referenced project is included in the Draft EIR existing condition discussion (Setting) and therefore relates to the availability of open space recreational facilities. While the CP/GUP proposes to add approximately 2,200 additional students, faculty and staff, the CP/GUP does not identify any new recreational facilities. The evaluation criteria states that an impact would be significant if it results in a substantial increase in the demand for public recreation resources.

Response to Comment 102-7

Comment Summary: The comment states that Stanford has applied to construct far more housing than is required to accommodate the increase in the number of faculty, staff and students projected to occur over the next ten years. Stanford intends to build all of its proposed housing and asks that the County approve all of the proposed housing sites for housing construction. The comment states that Stanford should not be required to build all proposed housing as a requirement for completion of proposed academic development.

Chapter 4.3 of the Draft EIR (Impact Analysis PH-3) concludes that the amount of the faculty/staff housing proposed by the University will be approximately equal to the housing demand generated by these additional employees based on the County's current employment ratio of 1.56 workers per household. The University proposes to construct additional student housing (primarily graduate student housing) in excess of the projected additional enrollment to achieve its goal of increasing on-campus housing for graduate students, thereby reducing the impact on the local housing market of students who want to live on campus but cannot be accommodated by the University. In view of the cumulative and growth-inducing impacts of increased development at Stanford, which are project-related impacts under CEQA, it is reasonable to require the construction of all of the proposed housing as mitigation.

Response to Comment 102-8

Comment Summary: The comment states that Stanford should not be held accountable for what it cannot control. On and off site requirements may reduce the number of approved feasible housing units on a given site.

Chapter 4.3 of the Draft EIR (Impact Analyses PH-1 and PH-3) recognizes that the University's plans to construct housing represent the maximum number of proposed units, and that actual construction could be less depending on unknown factors and other circumstances beyond the University's control. The County can develop the conditions of the General Use Permit to reflect constraints that may be imposed on Stanford regarding the development of housing. The CP and GUP also provide Stanford the flexibility to relocate housing units within designated sites or to other portions of the campus.

Response to Comment 102-9

Comment Summary: The comment states that Stanford agrees that the County can require Stanford to pay its fair share of the cost of intersection improvements. The fair share associated with net new peak hour vehicles added by the CP/GUP would need to be computed based on the percentage that those new trips represent of cumulative traffic growth. The number of net new trips may be less than the maximum number forecast in the EIR if TDM measures are at least partially successful. Stanford should not be required to contribute additional funds for intersection improvements that Stanford or others have already funded, or for intersection improvements that are alternatives to improvements that Stanford has funded or irrevocably offered to fund (e.g., the Sand Hill Road improvements).

It is noted that Stanford agrees to pay its fair share contributions towards improvements based on their share of cumulative growth, including consideration of adjustments for partial success of TDM trip reduction measures.

Response to Comment 102-10

Comment Summary: The comment states that the EIR recognizes that there are no data showing a relationship between Stanford traffic and cut through traffic on residential streets. The EIR's requirement that Stanford participate in neighborhood studies of cut-through traffic should be triggered only if the "no net new commute trips" goal is not met, since that would imply that there would be no additional cut-through trips. Further, Stanford should be required to participate in the study only if the County Planning office determines that there is a reasonable need for the study based on a review of a proposal presented by a neighborhood group or City.

The statement regarding the lack of data on the relationship between Stanford traffic and cutthrough traffic should not be interpreted to mean that there is no relationship. It simply means that there are no existing data regarding that relationship. Thus, it may not be possible for future neighborhood traffic studies to identify which portion of Stanford's cut-through traffic is an increase resulting from the CP/GUP. The County Planing office will be the arbiter of the need for Stanford to participate in any proposed study initiated by a neighborhood group or city and will participate in the analysis of any study and the identification of mitigation measures.

Response to Comment 102-11

Comment Summary: The comment states that site specific traffic impact studies required by the EIR for Stanford Avenue housing should address access and safety issues in the immediate vicinity of the project site, identify locations of project-related parking, and evaluate effects on established or planned sidewalks, crosswalks, bicycle lanes, paths, transit routes, and transit stops. All other types of off-campus traffic-related impacts are addressed by the "no net new commute trips" monitoring program, the prescribed intersection modifications, and the cut-through traffic mitigation requirements.

The County Planning Office will approve the appropriate scope of each site-specific traffic impact study based on the size, type, and location of the project and existing conditions at the time that the study is initiated.

Response to Comment 102-12

Comment Summary: The comment states that Stanford's policy is to manage parking demand through the price it charges for parking and by providing convenient alternatives to driving. Due to a variety of occasional activities and events on campus, Stanford has occasional need for additional parking and therefore does not control parking demand by limiting parking supply. Furthermore, providing adequate parking for events prevents parking from spilling over onto neighboring streets and private lots as indicated under TR-3 in the Draft EIR. Due to

development and concerns over the health of trees and landscaping, Stanford is shifting more of its event parking from informal areas to formal parking lots. Because housing requires more parking than other academic uses, the ratio of parking spaces to population will need to increase, so that residents will have storage space for cars even if they do not use the cars to commute. Using the more appropriate ratio of non resident parking spaces to population and adjusting for new campus population and the shift of off-campus residents onto the campus results in a balance of 476 new no-residential parking spaces to support day-to-day campus operations. Stanford has proposed 547 additional parking spaces to support the parking demand of the Performing Arts Center (933 spaces) that would exceed the existing 386 parking spaces between Palm Drive and Frost Amphitheater. Use of these spaces during non-event periods would require purchase of a parking permit, thus regulating parking demand.

Although Stanford does not choose to limit parking supply to manage traffic demand, from the county perspective it may be considered inconsistent to approve a substantial increase in parking while promoting trip reduction. The estimated need for 547 parking spaces for the Performing Arts Center represents almost one-half of the entire additional parking approved under the General Use Permit and disregards the availability of parking spaces within reasonable proximity of the sites under consideration for the Performing Arts Center. Stanford's policy of controlling parking demand and corresponding automobile use by charging for parking has been noted. If priced properly this can be a very effective tool for reducing automobile use. Studies have shown that the price of parking may have the greatest influence on the selection of automobile travel as a transportation mode. Thus, high parking prices can greatly reduce the number of drivers.

Response to Comment 102-13

Comment Summary: The comment states that Stanford requests the following modifications to the mitigation measures for construction related traffic. TR-7B: Stanford should be able to limit pedestrian and bicycle access within its own campus, and closure of public paths at the perimeter of the campus should be reviewed by the County Planning office. Covered walkways would not be needed for ground level construction or construction set far back from the sidewalk. TR-7D: Stanford can limit construction deliveries during specified hours, however limitations on workers arriving or departing the construction sites between 4:30 and 6:00 PM may not be feasible in all cases. TR-7F: The main construction access routes to the Stanford campus will be Page Mill Road and El Camino Real which are also used by many large trucks unrelated to the Stanford construction projects. This would make before and after surveys unreliable as a means of determining damage to the roadways caused by Stanford construction traffic.

As indicated in the text of mitigation TR-7B on page 4.4-108 of the Draft EIR, pedestrian access shall not be substantially limited during construction without prior approval from appropriate agencies.

The Draft EIR is revised as follows:

Page 4.4-109. The text of mitigation measure TR-7D shall be modified as follows:

When feasible, the project sponsor shall be required to prohibit or limit the number of construction employees from arriving or departing the site between the hours of 4:30 PM and 6:00 PM.

For streets with a high level of truck traffic unrelated to Stanford's construction activities, Stanford's responsibility relative to damage identified by the before and after survey should be adjusted using a fare share calculation based on Stanford's share of truck volumes or axle loads.

Response to Comment 102-14

Comment Summary: The comment provides detailed background information having to do with California tiger salamander and its management at Stanford, and asserts these main points:

- (1) that the housing proposed in the CTS Management Area would not conflict with the strategies outlined in the CTS Management Agreement;
- (2) that the proposed housing projects in the CTS Management Zone are beyond the scope of the CTS interagency management agreement, and therefore additional mitigation is appropriate;
- (3) Suggests several CTS mitigation measures tailored to the Driving Range Housing, Stable Site Housing, Lower Knoll Housing, Lathrop District Development, and Gerona Triangle Development.

Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Although the CTS Management Agreement provides for management of lands for the benefit of California tiger salamander, it does not provide for habitat protection. The fact that proposed housing in the CTS Management Area would not conflict with the strategies outlined in the CTS Management Agreement is an example of this lack of habitat protection. The CTS Management Agreement was required as mitigation for the Governor's Corner graduate student housing, and specifically states that additional mitigation could be required for projects not identified in the agreement, including GUP-related housing. Given the current status of this species (a candidate for listing under the federal Endangered Species Act), the recent listing of the Santa Barbara population of California tiger salamander, and the USFWS' assertion that the Stanford population of CTS may be genetically distinct and is the only known occurrence of the species remaining on the San Francisco Peninsula, a listing of this population is not unlikely if permanent protection of habitat is not included as a condition of the GUP. Option 2 of the mitigation program for California tiger salamander assures that permanent protection of habitat would occur. It also establishes a mitigation program designed to fully off-set project impacts and provide for the long-term survival of the population at Stanford. By implementing a mitigation program that will guard against a future listing of California tiger salamander, Stanford may retain some level of flexibility in its development program.

Response to Comment 102-15

Comment Summary: The comment requests that Mitigation Measure HA-2b be reworded to state that the County may hire an independent archaeologist for review purposes, but that the County

should not require private consulting archaeologists to conduct excavations on Stanford lands, depriving Stanford of academic opportunities.

The Draft EIR is revised as follows:

Page 4.9-12. The first paragraph of Mitigation Measure HA-2b is revised to indicate:

(b) Should previously unidentified historic or prehistoric archaeological resources be discovered during construction, the contractor shall cease work in the immediate area and the County and Campus Archaeologist shall be contacted. The County may choose to retain an independent archaeologist to evaluate the site. and provide mitigation. Either Stanford's archaeologist or an independent archaeologist retained by the County shall assess the significance of the find and make mitigation recommendations (e.g., manual excavation of the immediate area), if warranted. If performed by Stanford's archaeologist, the assessment shall be forwarded to County planning staff for independent review. If the County deems it appropriate, the County may hire an independent archaeologist to review the finds, proposed treatment plans, and reports prepared by the Campus Archaeologist.

Response to Comment 102-16

Comment Summary: The comment requests that Mitigation Measure HA-2c be reworded to indicate that the County Planning Office is not the agency that makes determinations regarding compliance with laws regarding Native American burials and artifacts under the applicable state laws.

The Draft EIR is revised as follows to provide clarification:

Page 4.9-13. Mitigation Measure HA-2c is revised:

(c) In the event that human skeletal remains are encountered, the applicant is required by County Ordinance No. B6-18 to immediately notify the County Coroner. Upon determination by the County Coroner that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to subdivision (c) of section 7050.5 of the Health and Safety Code and the County Coordinator of Indian affairs. No further disturbance of the site may be made except as authorized by the County coroner in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts. If artifacts are found on the site the Campus Archaeologist a qualified archaeologist shall be contacted along with the County Planning Office. No further disturbance of the artifacts may be made except as authorized by the County coroner in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts.

Response to Comment 102-17

Comment Summary: The comment states that the Draft EIR should recognize that provision of fire and police services are by a negotiated contract, and that Stanford pays for all services

-

provided. The comment also states that the Draft EIR should not require Stanford to pay more than the negotiated amount, nor should it specify who provides services.

As long as adequate service is maintained, the potential impacts would be fully mitigated. The Draft EIR is therefore revised to allow Stanford the flexibility to negotiate as to how services are provided.

The Draft EIR is revised as follows:

Page 4.10-14, Mitigation Measure PS-1B is revised:

(b) Stanford shall provide funding for the PAFD negotiate fire protection services to maintain at least 0.88 fire suppression personnel for each 1,000 additional daytime population at Stanford. The PAFD shall review the need for and to maintain an adequate level of additional equipment in response to the increased population, and Stanford shall fund this new equipment as necessary.

COMMENT LETTER 103, PETER DREKMEIER, EXECUTIVE DIRECTOR, STANFORD OPEN SPACE ALLIANCE, 8/7/00

Response to Comment 103-1

Comment Summary: The comment states that open space protection measures (such as open space dedication, granting of conservation easements, transfer of development rights, use of a development agreement, clustered development) suggested by Supervisor Joe Simitian on January 25, 2000 should be thoroughly studied in the Final EIR.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 103-2

Comment Summary: The comment states that the EIR should study a fourth option for the Academic Growth Boundary that would maintain the existing boundary between Stanford's Academic Campus and Academic Reserve and Open Space. This line is roughly the same as Palo Alto's Urban Growth and Urban Services Boundaries.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary and Response to Comment 55-2.

Response to Comment 103-3

Comment Summary: The comment requests that the FEIR study the long-term protection and habitat enhancement for other special-status species.

Mitigation incorporated in the Draft EIR will afford protection to the referenced species, including species in wetlands and riparian areas. See the discussion of Impact BIO-9 and

Mitigation Measure BIO-9 on page 4.8-40 of the Draft EIR. The studies the comment requests may be undertaken by the County upon reviewing the results of individual project applications.

Mitigation requirements for compensation of oak woodland /riparian woodland habitat address habitat enhancement for species that occur in these areas. Long-term protection of grasslands for CTS will also serve to protect habitat for other species that occur in this habitat. Wetland habitats will be mitigated through U.S. Army Corps of Engineers Section 404 permit process. These are the only natural habitats in the project area.

Response to Comment 103-4

Comment Summary: The comment requests that the FEIR study the Felt Lake area as a possible site for habitat restoration and introduction of special-status wildlife species.

The Draft EIR provides the framework for mitigation for specific projects that may be proposed in the future under the GUP. Mitigation Measure BIO-1 (a) through (e) – Option 2 provides that "Stanford shall provide for the long-term protection and management, through easements or other equally protective mechanism, of an amount of land equal to 3 times the acreage of the site to be developed" (see page 4.8-22 of the Draft EIR. As mitigation plans are developed, opportunities for habitat restoration in the area of Felt Lake and elsewhere may be identified in conformance with the requirements set forth in the Draft EIR (e.g. oak and riparian woodland habitat). This area would first need to qualify as a breeding site. In such instances, on-site mitigation is often more desirable than off-site.

Response to Comment 103-5

Comment Summary: The comment requests that the FEIR explore prohibition of development in the CTS Management Zone; include a biological assessment of the golf course; and inclusion of the golf course in the CTS Management Zone.

Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander, which includes a third option for mitigation for the California tiger salamander (CTS).

Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign for an evaluation of the golf course. The nature of maintenance activities required at the golf course make it largely unsuitable as CTS habitat, and its inclusion in the CTS Management Zone is not deemed appropriate.

Response to Comment 103-6

Comment Summary: The comment states that findings in the EIR should be based upon verification from a qualified biologist.

The findings in the EIR were prepared independently by several qualified biologists, not by Stanford. Section 8.2A of the Draft EIR lists preparers. See page 8-1 of the Draft EIR.

Response to Comment 103-7

Comment Summary: The comment states that the Draft EIR should include an analysis of a maximum build-out plan for Stanford University and should define the long-term developable areas of the campus so that Stanford can plan accordingly with higher density in the core campus.

Refer to Master Response 3, Intensified Development Alternative and Master Response 9, Additional Open Space Protection. The Draft EIR has evaluated the impacts of the CP/GUP as proposed by Stanford, and Stanford has not identified a plan for ultimate build-out. It is beyond the scope of this EIR to determine maximum build-out for the campus.

Response to Comment 103-8

Comment Summary: The comment states that to help determine the extent of Stanford's rights as property owner, the FEIR should include daytime population figures for both Stanford and Palo Alto.

The purpose of the EIR is to evaluate the potential population and housing impacts of the proposed project; Section 4.3 of the Draft EIR presents that evaluation. The County's permit authority over the draft Community Plan only extends to Stanford lands within unincorporated areas and not within the City of Palo Alto.

Response to Comment 103-9

Comment Summary: The comment states that the EIR should evaluate two additional reduced project alternatives: one with no academic development and half the proposed housing, and one with all of the proposed housing and half of the academic development.

Refer to Master Response 2, Reduced Project Alternative for discussion of a Reduced Academic Development Alternative that includes all of the proposed housing and half of the academic development. An alternative with no academic development has not been included because the County cannot require housing to be constructed to address housing impacts if Stanford is not permitted to develop any academic facilities. Without an increase in population there would be no impact requiring the development of housing.

Response to Comment 103-10

Comment Summary: The comment states that housing should be restricted to the existing core campus as defined by the County's designated A-1 zoning and Palo Alto's Urban Growth Boundary. Some of the parking lots should be converted into multi-story parking structures to free up parking areas for housing. There are still many under-utilized sites on the Stanford campus that would be appropriate for higher density housing. All housing construction should be outside the Tiger Salamander Management Zone.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites. Also refer to Responses to Comments 21-1 and 39-3.

COMMENT LETTER 104, DIANNE DRYER, 8/7/00

Response to Comment 104-1

Comment Summary: The comment requests that Stanford be required to contain its new development within the current campus area, and that development not be permitted west [south] of Junipero Serra Blvd.

Refer to Master Response 3, Intensified Development Alternative.

The Draft EIR identified significant impacts associated with proposed land use modifications for the Lathrop Development District located south of JSB. As a result, the Draft EIR included alternative components LU-A, LU-B, AGB-A and AGB-B.

Response to Comment 104-2

Comment Summary: The comment states that Stanford should be required to provide shuttle buses in and out of campus.

The Stanford University Marguerite shuttle provides service in and out of campus as described on page 4.4-10 of the Draft EIR.

Response to Comment 104-3

Comment Summary: The comment states that the Stanford foothills should be designated as permanent open space with some public access.

Refer to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 105, TINA MINELL, 8/7/00

Response to Comment 105-1

Comment Summary: The comment states that more open space needs to be provided for nearby residents and their dogs who will be adversely affected by Stanford's proposed construction.

Refer to Master Response 9, Additional Open Space Protection and Response to Comment 23-1.

COMMENT LETTER 106, HAROLD BOYD, 8/7/00

Response to Comment 106-1

Comment Summary: The comment states that Stanford should increase the density of its current and planned housing to accommodate more people on less land.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites. Also refer to Responses to Comments 21-1 and 39-3.

COMMENT LETTER 107, HERB BOROCK, 8/7/00

Response to Comment 107-1

Comment Summary: The comment states that Table 2-2 on Draft EIR page 2-14 needs to be expanded to show comparable data for existing and proposed gross square footage, existing and proposed GSF of all housing except single family homes, and include all GSF for the entire 2,100,300 GSF entitlements of the 1989 GUP.

Additional gross square footage of student housing can be estimated by assuming 550 square feet per unit of student housing and 1,000 square feet per unit of resident/postdoctoral fellow housing. As noted in footnote 1 of Table 2-2, the figures for Existing GSF include programmed development in gross square feet (GSF) allowable under the 1989 General Use Permit. It should be noted that, consistent with accepted planning practices, the County is analyzing housing in terms of units rather than GSF, except where the actual building size is relevant to the analysis.

The Draft EIR is revised as follows:

Page 2-14, footnote 2 of Table 2-2 is modified to read:

2 Additional gross square feet (GSF) are estimated. Additional gross square footage of student housing can be estimated by assuming 550 square feet per unit of student housing and 1,000 square feet per unit of resident/postdoctoral housing. This would result in an additional 1,450,000 GSF of housing within the Academic Campus area, or a total of 3,485,000 additional GSF (excluding faculty/staff housing).

Response to Comment 107-2

Comment Summary: The comment states that the column "Existing GSF" in Table 2-2 includes "programmed development_ allowable under 1989 [GUP]" and asks if the Total Existing GSF includes all 2,100,300 GSF allowable under the 1989 GUP and if not, how much of the 2,100,300 the Total Existing GSF includes housing.

The Total Existing GSF does include all development allowable under the 1989 GUP.

Response to Comment 107-3

Comment Summary: The comment asks how much of the 1989 GUP allowable GSF shown in Table 2-2 is "Academic Space" not including Housing, and how much of it is Housing.

Of the 2,100,300 GSF allowed under the 1989 GUP, 479,503 GSF is housing, and the remaining 1,620,797 GSF is academic space.

Response to Comment 107-4

Comment Summary: The comment states that Table 2-2 must be revised to add two new columns, so that the table contains separate columns for existing and additional housing and academic space.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

Table 2-2 is not intended to focus on information on existing and future housing. The requested data is partially available in Tables 2-3 and 2-4, which provide information on existing and proposed housing, both for academic campus (student housing) and for staff. The data on numbers of units can be converted to gross square feet (GSF), by using the data in Table 2-3 and an average size of 550 GSF for graduate and undergraduate housing, and 1,000 for residents and postgraduate fellows. These calculations result in the following estimates of GSF:

	Ur	Idergradua	ate		Resident/ Post Grad.				
Development District	Exist ¹ GSF	Add'tl ¹ GSF	Total GSF	Exist ¹ GSF	Add'tl ¹ GSF	Total GSF	Additional GSF		
West Campus									
Lathrop									
Foothills									
Lagunita	1,505,350	0	1,505,350	147,950	508,750	626,700			
Campus Center									
Quarry							350,000		
Arboretum									
DAPER/Admin.									
East Campus	1,496,550	55,000	1,551,550	1,962,400	536,250	2,498,650			
San Juan	245,300	0	245,300	12,100	0	12,100			
Total	3,247,200	55,000	3,302,200	2,122,450	1,045,000	3,167,450	350,000		
	Source: Stanford University General Use Permit Application, November 15, 1999								

Housing GSF – Academic Campus

1. GSF estimated based on 550 GSF per unit for student housing and 1,000 GSF per unit for resident/postgraduates.

Response to Comment 107-5

Comment Summary: The comment states that the EIR must show how the Housing GSF was calculated by showing the product of "number of units" by "GSF per unit" for each category of housing (except single family housing).

Refer to Response to Comment 107-4, which includes estimates of GSF per unit.

Response to Comment 107-6

Comment Summary: The comment states that the housing categories identified by the applicant must be divided into more categories to perform the calculation of housing GSF and that the EIR must distinguish when the calculation of a component of Additional Housing GSF is using the size of a group housing unit occupied by more than one student, resident, or fellow, and must reconcile the number of units with the number of population category occupying the units.

Dividing housing into the two categories: student housing (which includes undergraduates and graduate students) and resident/postgraduate housing is sufficient for the impact analysis. For purposes of the EIR analysis, it has been assumed that one student occupies each unit. Housing has been assumed to be occupied by the type of occupant for which it was designed.

Response to Comment 107-7

Comment Summary: The comment states that the EIR must also include a table that compares the Existing GSF and Additional GSF for attached faculty and staff housing that includes all attached housing that is consistent with the definition of single family homes that Stanford used to exclude Ryan Court housing from being charged against the allowable GSF in the 1989 GUP. The revised Table 2-2 and the second table would then contain all existing and proposed faculty and staff housing except single-family detached homes.

The County has not tracked gross square footage of single family homes because Stanford may construct such homes to the extent consistent with the A-1 zoning of the core campus area. The housing at Ryan Court is defined as single family homes, which are excluded from the GUP, because they are allowed under the A-1 zoning entitlement. The requested information is not necessary to describe the proposed project or assess its impacts.

Response to Comment 107-8

Comment Summary: The comment states that the EIR must also include a table that compares the number of Existing and Additional single-family detached faculty and staff homes.

It is not possible to compare the number of existing and proposed single-family housing units because the University has not prepared detailed development plans at the present time for all of the faculty/staff housing that it proposes to construct over the next ten years. Under the Community Plan, additional faculty/staff housing will be a mixture of single-family homes, townhouses, condominiums, and apartments (see Chapter 4.3, Impact Analysis PH-1). The University has not specified the exact number of each type of dwelling unit to allow flexibility for changing needs and market conditions. There are 989 existing faculty staff housing units. Additional information is not necessary to describe the proposed project or assess its impacts.

Response to Comment 107-9

Comment Summary: The comment states that Figure 2-5 on Page 2-11 of the Draft EIR must be corrected to show that housing sites H and I can be used by young faculty, and that some graduate student housing at sites B, C, D, F, G and J can be used by postgraduate fellows.

The figure is intended to show areas proposed for types of housing. Although it is true that Stanford has indicated that there may be some flexibility in the actual assignments of housing members of the Stanford community, this would not change the character of the housing itself. The housing designations in Figure 2-5 accurately reflect the housing type proposed by Stanford.

Response to Comment 107-10

Comment Summary: The comment states that all of this housing that can be used by more than one group is apartment housing, rather than group housing, and Figure 2-5 must be changed to designate sites H, I, and the relevant portions of sites B, C, D, F, G, and J the same color as Faculty/Staff (Moderate Density).

Figure 2-5 is intended to reflect the types of housing proposed by Stanford. The student housing proposed by Stanford at sites H, I, B, C, D, F, G, and J is accurately reflected in the figure. No change is deemed necessary.

Response to Comment 107-11

Comment Summary: The comment states that the EIR must separate land use designations for apartment housing and group housing.

There are no material differences in the environmental impacts associated with apartment housing and group housing. Both types of housing have been proposed for students, and would be located within the Academic Campus land use designation. Separate designations are not necessary.

Response to Comment 107-12

Comment Summary: The comment states that Table 4.3-7 on Draft EIR Page 4.3-8 must be expanded, must use internally consistent data, must be consistent with the text in housing subsection "Affordability and availability of Housing" on Draft EIR Pages 4.3-10 through 4.3-12, must use the most current data, and must be consistent with the data in Stanford University's Santa Clara County General Use Permit Annual Report # 11.

The comment does not specify how Table 4.3-7 should be expanded. Specific comments regarding the table are addressed below.

Data for Table 4.3-7 are internally consistent with respect to available information. To compare dwelling units on the Stanford campus only, University records were used for 1990 and 1999 (in contrast to the U. S. Census Bureau-defined Stanford CDP, which includes more than the Stanford campus). 1990 housing stock information for Palo Alto, Menlo Park, and Santa Clara county are based on the same information source: the 1990 Census. 1999 housing stock information for Palo Alto, Menlo Park, and Santa Clara county are also based on the same information source: the Department of Finance's May 1999 E-5 Report (City and County Population and Housing Estimates).

Page 4.3-12 contains inconsistent numbers (5,904 plus 3,859 units for a total of 9,763) compared to Table 4.3-7 (9,354 units) regarding the number of graduate and undergraduate housing "units" in 1999. According to Santa Clara County General Use Permit Annual Report #11, there were 5,839 undergraduates and 3,515 graduate students housed on campus in 1999, or 9,354 total. The data cited in Table 4.3-7 was the most current available at the time of the preparation of the Draft EIR. The number of housing units cited in Table 4-3.7 is consistent with page 10 of General Use Permit Annual Report #11.

Response to Comment 107-13

Comment Summary: The comment states that the 1989 GUP set limits on total Stanford population, regardless of which jurisdiction has that population. Thus, the 1989 GUP population limit includes S.L.A.C. population in San Mateo County and Medical Center population Palo Alto. The EIR must consistently refer to all population using the same standards that are use in the 1989 GUP.

The proposed project is a new Community Plan and General Use Permit. The standards by which population are defined and limited are described in the Community Plan. Because the project is a new proposed plan, it may or may not be consistent with population measurements in the 1989 GUP. The County has determined that these measurement procedures are not effective and has chosen not to use them in the future. The EIR evaluates the standards contained in the proposed Community Plan because this is the proposed project. The proposed CP/GUP does not propose setting limits on total (including non-Santa Clara County) Stanford population, so this Draft EIR has not included evaluation of changes in population outside the project area.

Response to Comment 107-14

Comment Summary: The comment states that Faculty, Staff and Student population must include everyone at the General Campus, Medical Center, and S.L.A.C.

Refer to Response to Comment 107-13.

Response to Comment 107-15

Comment Summary: The comment states that the number of 1990 and 1999 Housing Units for Stanford in Table 4.3-7 is taken from GUP Annual Report #11, but the numbers for 1990 are inconsistent.

The Draft EIR is revised as follows:

Table 4.3-7 on page 4.3-8 and Table 5-1 on page 5-3 are revised as follows to reflect the 1989-1990 academic year for both faculty/staff housing units and students housed:
Table 4.3-7

Growth in the Housing Stock 1990 - 2000

Jurisdiction	1990 Housing Units	1999 Housing Units*	
Stanford	956 faculty/staff units	989 faculty/staff units	
	8,658 - <u>8,564</u> students housed	9,354 students housed	
City of Palo Alto	25,188	25,952	
City of Menlo Park	12,428	12,723	
Santa Clara County	540,240	581,532	

Finance; Stanford University

*Data for Stanford is from 1999 Annual Report #11 for the period September 1998 through August 1999.

(Note: Stanford housing unit data are based on academic years. 1990 Census housing unit data for Palo Alto, Menlo Park, and Santa Clara County are as of April 1990. 1999 housing unit data for Palo Alto, Menlo Park, and Santa Clara County are from California Department of Finance estimates as of January 1, 1999.)

Table 5-1

Population and Housing Growth at Stanford and Nearby Jurisdictions (1990-2000)

Jurisdiction	1990 Population	1990 Housing Units	2000 Population	1999 Housing Units***
Stanford CDP*	18,097	956 faculty/staff units 8,658-8,564 students housed	12,358**	989 faculty/staff units 9,354 students housed
Palo Alto	55,900	25,188	61,500	25,952
Menlo Park	28,403	12,428	31,800	12,723
Santa Clara County	1,497,577	540,240	1,736,700	581,532

Sources: U.S. Census Bureau, 1990 Census California Department of Finance, Stanford University web site

* The Stanford Census Designated Place (CDP), a U. S. Census Bureau geographical designation that includes lands within the City of Palo Alto, thus the population number for 1990 is higher than the actual population of the campus.

** Estimate of the 2000 Stanford campus resident population (See Table 4.3-1). This is not the same geographic area as the Stanford CDP defined in the 1990 Census. Year 2000 Census data for the Stanford CDP was not available as of June 2000.

*** 2000 housing unit information not available from the Department of Finance as of June 2000.

Ξ.

Response to Comment 107-16

Comment Summary: The comment states that Table 4 on page 11 of the Annual Report uses academic years, and Table 4.3-7 of the EIR should also use academic years.

The Draft EIR is revised as follows:

Page 4.3-8. To clarify the time period covered by the different data sources used in preparing Table 4.3-7, the following footnote should be added:

Stanford housing unit data are based on academic years; 1999 data are for the period September 1998 through August 1999. 1990 Census housing unit data for Palo Alto, Menlo Park, and Santa Clara County are as of April 1990. 1999 housing unit data for Palo Alto, Menlo Park, and Santa Clara County are from California Department of Finance estimates as of January 1, 1999.)

Response to Comment 107-17

Comment Summary: The comment states that the EIR must replace 1999 with 1998-99, unless data are available for 1999-2000, which should be used instead.

The footnote to Table 4.3-7 will be amended to add that 1999 housing unit data from Stanford is for the period September 1998 through August 1999. Refer to Response to Comment 107-16.

Response to Comment 107-18

Comment Summary: The comment states that the number of student housing units for 1999 in the EIR is the same as the number shown on Annual Report page 10, but the number of graduate students in Table 4 on Page 11 is a different number than the number on page 10 and would yield a different total for students housed if used.

Table 4 on page 11 of GUP Annual Report #11 contains a typographic error pertaining to the number of graduate students housed in 1998-99. The correct number was 3,515 as shown on page 10. The net increase in graduate students between 1988-89 and 1998-99 was 585, not 740 as shown in Table 4 (3,515 less 2,930).

Response to Comment 107-19

Comment Summary: The comment states that the number of faculty housing units for 1990 in EIR Table 4.3-7 is the same as Annual Report Table 4 for 1989-90, but the number of student housing units for 1990 is the same as 1990-91.

Refer to Response to Comment 107-15.

Response to Comment 107-20

Comment Summary: The comment states that the academic year 1989-90 must be used consistently.

References to the year 1989-1990 in Chapter 4.3-7 that relate to Stanford housing or population data provided by the University have been noted as the 1989-1990 academic year.

Response to Comment 107-21

Comment Summary: The comment states that Table 4.3-7 must be broken into two tables; one table for housing units for faculty and staff eligible to live on campus, and one or more tables for other categories of population.

Table 4.3-7 provides consistency between the EIR and the 1989 General Use Permit and associated annual reports, which track student housing "units," even though most of these "units" are individual students.

Response to Comment 107-22

Comment Summary: The comment states that the categories of "Hospital Residents" and Postgraduate Fellow" must be shown separately and must be cross-referenced to the appropriate line item in Table 1 on page 3 of GUP Annual Report #11.

References to population and housing units in Chapter 4.3 are consistent with section I of Table 1 in GUP Annual Report #11, which divides total daytime population into students, faculty, and staff. Detailed information on residents/postdoctoral fellows would not change the impact analysis.

Response to Comment 107-23

Comment Summary: The comment states that the table for eligible faculty and staff must show for each year:

- The total eligible population
- The total units on campus
- The total units without an eligible person
- The difference between number 2 and number 3 above.
- The number, based on substantial evidence, of non-resident eligible faculty and staff that want to move on campus to occupy the existing or proposed units.

The analysis compares employment with estimated housing to be provided by the University (current and projected) to develop a market analysis of the potential housing gap and the extent to which that gap will be addressed by additional housing proposed in the draft Community Plan. Some of the housing proposed by the University could be occupied by more than one type of faculty or staff employees, so the analysis recommended in the comment may not provide an accurate comparison of housing availability versus potential demand.

1.40

Response to Comment 107-24

Comment Summary: The comment states that the EIR must include an estimate for the 2010 of the number of units without an eligible person.

It is beyond the scope of the EIR and the relevancy of the evaluation of housing need versus availability to speculate on the projected occupants of university housing and the number that are not "eligible" persons.

Response to Comment 107-25

Comment Summary: The comment states that the table for other population categories must provide the following information for each of the categories of undergraduate students, graduate students, postgraduate fellows, hospital residents, and all other staff:

- 1. The total population
- 2. The total units (or beds for group housing) on campus
- 3. The number, based on substantial evidence, of non-residents in the population category who want to move on campus to occupy the existing or proposed units (that is, the housing deficit)

The Draft EIR (Chapter 4.3) already documents the relevant population and housing stock for the purpose of evaluating the potential project impact on housing demand and supply. Santa Clara County is unaware of any current, reliable information on non-residents that would aid in the evaluation of housing supply and demand impacts from the proposed project, aside from the figures regarding the level of graduate student interest in the on-campus "lottery" and the survey conducted by graduate students in 1998.

Response to Comment 107-26

Comment Summary: The comment states that the number in the EIR for the housing deficit for each population category must be based on substantial evidence, that is, facts, reasonable assumptions based on fact, or expert opinion based on fact.

The discussion in Chapter 4.3 (Impact Analysis PH-3) is based on substantial evidence provided by the University, the City of Palo Alto, Santa Clara County, the Association of Bay Area Governments, and other public agencies regarding the shortage of housing in the vicinity of the University and how that shortage could be affected by the draft Community Plan in light of other known projects proposed in the area.

Response to Comment 107-27

Comment Summary: The comment states that the EIR must evaluate mechanisms to guarantee that any off-campus housing used to satisfy mitigation measures for numbers of housing units, or for other purposes, is permanently reserved for use by Stanford students faculty and staff before building other housing.

Santa Clara County could add a condition to its approval of the Community Plan that students, faculty, and staff be given the right of first refusal for housing to be constructed by the University. A further condition of approval could be that the University report annually to the County on the occupants of housing it owns, manages, or develops to ensure that the intent of the Community Plan is being achieved. However, no housing that currently exists or is being constructed could count towards reduction of any deficit because that housing is assumed to exist as part of the setting.

Response to Comment 107-28

Comment Summary: The comment states that the EIR must evaluate an alternative that builds the amount of housing units required to eliminate the housing deficit, without adding to the population of students, faculty, and staff.

It would be difficult for the County to require construction of housing to address the existing housing deficit if no further academic development is permitted because development of housing is linked to future growth of academic facilities. The suggested alternative is thus not feasible.

Response to Comment 107-29

Comment Summary: The comment states that some of the proposed additional academic gross square footage (GSF) is independent of population growth of students, faculty, and staff, and some of the additional academic GSF is related to the project's proposed growth in population. The EIR must identify which projects and how much additional academic GSF would be built if no increase is allowed in the number of students, faculty and staff. The EIR must evaluate an alternative that is composed of this fixed additional academic GSF, no population growth, and the housing units required to eliminate the housing deficit.

Additional population is largely related to proposed additional development. This can be seen in the definition of the reduced project alternative, which includes half of the academic GSF (1,017,500 square feet instead of 2,035,000 square feet), and roughly half of the population (1,280 instead of 2,201). The reduction is less than half because elimination of the basketball arena and performing arts center have negligible impacts on the number of faculty, staff and students. Development of housing is linked to future growth of academic facilities. The suggested alternative is thus not feasible.

Response to Comment 107-30

The EIR must evaluate strategies for alternatives to these housing sites, including alternatives locations for the housing and required Stanford to occupy housing at other sites before building on sites that are outside of Palo Alto's Urban Service Area.

Refer to Master Response 4, Alternative Housing Sites and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 107-31

Comment Summary: The comment states that the EIR must evaluate the alternative of building four-story wood frame buildings at housing site C to accommodate the housing proposed for the El Camino Real frontage.

Refer to Master Response 4, Alternative Housing Sites, which discusses building additional units in multi-story buildings at Escondido Village. Page 7-46 of Draft EIR contains an evaluation of Alternative components HOUS-D and HOUS-F, which eliminate development of housing along the El Camino Real frontage (Sites D and I).

Response to Comment 107-32

Comment Summary: The comment states that if it is unavoidable to build housing outside Palo Alto's Urban Service Area then the EIR must evaluate the alternative of building housing in the interior of campus, instead of on the edge of campus in the open space area.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 3, Intensified Development Alternative; Master Response 4, Alternative Housing Sites and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 107-33

Comment Summary: The comment states that the EIR should evaluate the mitigation of requiring Stanford to build on all other housing sites before building on site D, I, and E. The EIR should also evaluate the mitigation of requiring Stanford to use all 628 apartments at Stanford West in Palo Alto for faculty, student, and staff before building on sites D, I, and E.

Refer to Master Response 4, Alternative Housing Sites, and Response to Comment 107-31. Alternative HOUS-C, which would eliminate development of housing along Stanford Avenue (Site E) is evaluated in the Draft EIR on page 7-46. Stanford's use of a priority system for Stanford employees at Stanford West is an existing condition.

Response to Comment 107-34

Comment Summary: The comment states that the secondary effects of moving current uses located on proposed golf course alternative sites must be included in the evaluations of those alternative golf course sites.

Refer to Response to Comment 58-4. As noted in Response to Comment 58-4, the Draft EIR does not need to include analysis of proposed golf course relocation sites. Therefore, the Draft EIR does not need to include analysis of secondary effects of moving the current uses on those sites.

COMMENT LETTER 108, HERB BOROCK, 8/7/00

Response to Comment 108-1

Comment Summary: The comment states that the EIR must evaluate the alternative of building taller than four stories at housing site C to accommodate the housing proposed for the El Camino Real frontage, even if it requires replacing wood frame construction with steel frame construction.

Refer to Master Response 4, Alternative Housing Sites and Response to Comment 107-31.

COMMENT LETTER 109, SUSAN COLE, 8/7/00

Response to Comment 109-1

Comment Summary: The comment expresses unhappiness with the abrupt policy changes regarding use of the "Dish" area. The ban on dogs will effectively ban hundreds of community members from hiking in this area.

Refer to Master Response 9, Additional Open Space Protection and Response to Comment 23-1.

Response to Comment 109-2

Comment Summary: The comment states that Stanford is requesting approval of plans to relocate California tiger salamander without any proof that it will succeed.

The Draft EIR requires that any new habitat areas for California tiger salamander (CTS) be demonstrated to be successful before construction on existing CTS habitat is allowed. Refer to Mitigation Measure BIO-1(a) through (e) on pages 4.8-28 through 4.8-33. Both options require that replacement habitat be demonstrated to be successful before construction on existing habitat areas starts. Stanford's proposal for management of the "Dish" area is not part of the CP/GUP. Refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

COMMENT LETTER 110, ERIC FERTIG, 8/7/00

Response to Comment 110-1

Comment Summary: The comment notes that two letters were delivered to the SCC Planning desk without a return address. A return address is provided.

The letters referenced in the email are included in the comments as letter numbers 23 and 79.

COMMENT LETTER 111, JOHN BACA, 8/7/00

Response to Comment 111-1

Comment Summary: The comment suggests that the CP should include policies regarding baseline data, data validation, thresholds of inaccurate data provided, and remedial action when thresholds are exceeded.

The County's requirements for environmental review of projects no longer allow project applicants such as Stanford to retain consultants to prepare environmental documents. The County now retains an independent consultant who reports directly to the County, and who is responsible for development of baseline data and verification of any data submitted by project applicants. Stanford would be required to follow these procedures, so a specific policy regarding baseline data, data validation and remedial actions in environmental review is not necessary in the CP. In addition, the County proposes to revise the annual report process under the new General Use Permit. Under the new process the County would prepare annual reports under its own direction, rather than allowing that Stanford prepare and submit the report. Data will thus be independently verified under this new process. Compliance with all required mitigation measures will be assured through implementation of the mitigation monitoring and reporting program.

Response to Comment 111-2

Comment Summary: The comment suggests that the Hydrology section and any other parts that are similarly inadequate be removed from the Program EIR.

The Draft EIR is intended to present a program-level analysis of potential project impacts on the environment. Consequently, as noted in Response to Comment 94-44, the storm runoff estimates presented in the Draft EIR are order of magnitude estimates since site-specific information is not yet available. Mitigation Measure HWQ-1 requires that Stanford prepare site-specific hydrology calculations for improvements that will result in the creation of additional impervious surfaces.

Responses to this and several other comments regarding the hydrologic analyses have also been addressed through revision of the Draft EIR to clarify the requirements included as part of Mitigation Measure HWQ-1: Manage Stormwater Runoff. Refer to Response to Comment 14-11.

Response to Comment 111-3

Comment Summary: The comment requests that the Draft EIR analyze whether the CP policies are sufficient to provide accurate verifiable data.

The County has existing policies regarding verification of information during the environmental review process. The CP is a planning tool. The primary means of assessing and mitigating environmental impacts of the GUP is through the CEQA process.

Response to Comment 111-4

Comment Summary: Within policy SCP-LU 6 the following is stated: "Assist Stanford in responding to land use implications arising from the changing Silicon Valley environment". Is the "Silicon Valley environment" defined anywhere?

The comment does not address the Draft EIR or the project description.

Response to Comment 111-5

Comment Summary: The comment asks how County policies will deal with conflicting information.

The comment refers to a project that was analyzed separately from the CP/GUP. Refer to Responses to Comment 111-1 and 111-3. Data provided by Stanford will be verified by independent experts.

Response to Comment 111-6

Comment Summary: The comment states that mitigation and monitoring should not be left without consideration in CP policies.

A Mitigation Monitoring and Reporting Program is included in the Final EIR. Also refer to Response to Comment 111-3.

Response to Comment 111-7

Comment Summary: The comment states that Hydrology section in the Draft EIR is incomplete and was not prepared in accordance with the scope described in the Notice of Preparation (NOP).

In accordance with the NOP, the available information regarding the project site and the affected watersheds is presented in the Draft EIR.

Responses to this and several other comments regarding the hydrologic analyses have also been addressed through revision of the Draft EIR to clarify the requirements included as part of Mitigation Measure HWQ-1: Manage Stormwater Runoff. Refer to Response to Comment 14-11.

Response to Comment 111-8

Comment Summary: The comment states that the proposed mitigation is limited to preventing Stanford from causing downstream flooding due to increased storm runoff discharges.

The intent of the Draft EIR is to identify how existing conditions could be affected by the Stanford project. Responses to this and several other comments regarding downstream flooding have been addressed through revision of the Draft EIR to clarify the requirements included as

÷

part of Mitigation Measure HWQ-1: Manage Stormwater Runoff. Refer to Response to Comment 14-11.

Response to Comment 111-9

Comment Summary: The comment states that the Hydrology section in the Draft EIR is incomplete since the results from the East Campus Drainage Study are omitted.

As noted in Response to Comment 46-1, the East Campus Drainage Study, which is still being prepared by Stanford, is not yet complete. It was therefore not used as a source of information.

Response to Comment 111-10

Comment Summary: The comment states that areas subject to flooding as shown in the CP are based on outdated 1996 Federal Emergency Management Agency (FEMA) mapping that was prepared before the flood in 1998.

Post-1996 FEMA mapping that shows revised flood prone areas is not available. However, responses to this and several other comments regarding downstream flooding have been addressed through revision of the Draft EIR to clarify the requirements included as part of Mitigation Measure HWQ-1: Manage Stormwater Runoff. Refer to Response to Comment 14-11.

Response to Comment 111-11

Comment Summary: The comment states that there is no way to determine if significant impacts can be mitigated since the Draft EIR provides very little description of the Stanford drainage system.

Existing storm drainage patterns in the project area are shown in Figure 4.5-1 in the Draft EIR. The watershed subareas and discharge locations shown in the figure are based on an analysis of the Stanford storm drainage system. The detention basin capacity estimates in Table 4.5-2 demonstrate that based on the development assumptions in the Draft EIR, Stanford can mitigate the post-development flood impacts that would result from a 100-year 24-hour storm by providing 22,300 cubic feet of detention basin capacity. Refer to Response to Comment 52-11 for a discussion regarding the availability of Stanford land for construction of the required detention basin facilities.

Response to Comment 111-12

Comment Summary: The comment asks for further information regarding the modeling parameters used in estimating pre- and post- development storm flows.

On page 4.5-9, the Draft EIR indicates that the 100-year precipitation used to estimate storm runoff was 4.32 inches over 24 hours. The hydrologic analyses were also based on the information presented in section 4.5.A.2, which begins on page 4.5-2, and the information shown in Tables 4.5-1 and 4.5-2. Refer also to Response to Comment 94-54 for a correction to the referenced text.

In addition, Table 4.5.2 in the Draft EIR has been revised as follows to show the estimated times of concentration that were used for modeling purposes, and to correct the SCS Runoff Curve Numbers (CN) for Subarea M-7. Based upon this change, the estimated detention basin capacity requirement for Subarea M-7 is slightly increased.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

Table 4.5-2

1.

		Estimated Existing Pre-GUP Condition			<u>Es</u>	<u>timated</u> Pro	posed Post	-GUP Conditi	on	
Subarea	Total Area (acres)	Existing Imper- vious Area (acres)	SCS Runoff Curve No. (CN)	<u>Total</u> <u>Time of</u> <u>Concen-</u> <u>tration</u> (hours)	Peak 100- Year, 24- Hour Runoff. Q _{pre} (cfs)	Additional Imper- vious Area (acres)	SCS Runoff Curve No. (CN)	<u>Total</u> <u>Time of</u> <u>Concen-</u> <u>tration</u> (hours)	Peak 100- Year, 24- Hour Runoff, Q _{post} (cfs)	Detention Basin Capacity Requireme nt (cubic feet) ¹
S-1	380	10	77	<u>0.26</u>	174	1	78	<u>0.26</u>	185	8,300
S-2	520	51	64	<u>0.19</u>	72	19	65	<u>0.19</u>	79	8,000
Subtotal, San Francisquito Creek Watershed	900	61			246	20			264	16,300
M-3	440	117	85	<u>0.17</u>	246	1	85	<u>0.17</u>	246	None ²
M-4	110	30	86	<u>0.19</u>	56	5	87	<u>0.19</u>	58	1,600
M-5	390	209	87	<u>0.41</u>	225	7	87	<u>0.41</u>	225	None ²
M-6	140	34	70	<u>0.27</u>	26	1	70	<u>0.27</u>	26	None ²
M-7	270	47	67 <u>64</u>	<u>0.51</u>	39	5	68 <u>65</u>	<u>0.51</u>	43	4 ,400 <u>4,800</u>
Subtotal, Matadero Creek Watershed	1,350	437			592	19			598	<u>6,400</u> 6,000
Totals:	2,250	498			838	39			862	<u>22,700</u> 22,300

Estimated 100-Year 24-Hour Storm Runoff and Detention Basin Requirements

1. Estimated detention basin storage capacity required to prevent Qpost from exceeding Qpre.

2. Although some additional impervious area will be constructed in this subarea, the increase in impervious area is not sufficient enough to cause an increase in the SCS Runoff Curve number and thus an increase in the peak storm runoff discharge.

Response to Comment 111-13

Comment Summary: The comment asks for clarification regarding the sub-watersheds modeled, and questions the use of the TR-55 model to estimate storm runoff.

The hydrologic analysis was only performed on the seven watershed subareas described in Table 4.5-2, where it has been assumed that development will occur. The seven watershed subareas are all within the Stanford lands and do not encompass the entire watersheds for Matadero Creek or San Francisquito Creek.

The Draft EIR is intended to present a program-level analysis of potential project impacts on the environment. Consequently, as noted in Response to Comment 94-44, the storm runoff estimates presented in the Draft EIR are order of magnitude estimates since site-specific information is not yet available. The TR-55 model is suitable for development of order of magnitude estimates.

The County will require that Stanford prepare site-specific hydrology calculations for improvements that will result in the creation of additional impervious surfaces. At that time the County may require that Stanford use other more complex models to estimate storm runoff based on site-specific conditions. Stanford's conclusions will be independently verified as part of project review.

Response to Comment 111-14

Comment Summary: The comment notes that the region in the vicinity of the Palo Alto Water Quality Control Plant is not in compliance with the 4.9 ppb copper standard for discharges to San Francisco Bay. The comment asks for data showing the quality of samples in the San Francisquito Creek watershed.

Table 4.5-3 in the Draft EIR shows the range of concentrations determined from analyses of 9 to 10 stormwater samples collected at each sampling point by Stanford between 1993 and 1999. Each of the sampling points shown in the Draft EIR table is within the Matadero Creek watershed.

Additional data showing the results for samples of stormwater discharges to San Francisquito Creek are being provided by revising Table 4.5-3 (see following page) in the Draft EIR to list two additional sample points which were also monitored by Stanford during the same period.

The combined analyses show that copper concentrations in storm water samples ranged from a low of ND (not detected) to a high of 230 parts per billion (ppb).

The Draft EIR is revised as follows:

Page 4.5-13. Table 4.5-3 is revised to include additional information.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

Table 4.5-3

Storm Water Runoff Quality in Project Area Vicinity (1993 through 1999)

	Sampling Point		Specific	pH (units)	Total	Copper	Lead (mg/l)	Oil and
No.	Description	Collected	Conductance (umhos/cm)		Suspended Solids (mg/l)	(mg/l)		Grease (mg/l)
1	Stanford Ave at Dartmouth St	10	51 to 1,100	6.9 to 8.8	4 to 230	ND to 0.055	ND to 0.022	ND
2	Stanford Ave at El Camino Real	10	34 to 110	6.5 to 8.6	9 to 210	ND to 0.047	ND to 0.025	ND to 11
3	Sierra St at El Camino Real	10	46 to 110	7 to 9.1	11 to 200	0.014 to 0.07	ND to 0.062	ND to 18
4	Football Stadium at El Camino Real	10	81 to 910	6.8 to 8.9	34 to 230	ND to 0.064	ND to 0.04	ND to 14
5	Galvez St at El Camino Real	9	51 to 180	6.6 to 8.8	15 to 180	0.015 to 0.035	ND to 0.015	ND
<u>6</u>	<u>90-inch Storm Drain at San</u> <u>Francisquito Creek (200 feet</u> <u>upstream of El Camino Real)</u>	<u>10</u>	<u>44 to 850</u>	<u>7.1 to 8.9</u>	<u>ND to 54</u>	<u>ND to 0.23</u>	<u>ND to 0.029</u>	<u>ND to 5.5</u>
7	42-inch Storm Drain at San Francisquito Creek (600 feet upstream of El Camino Real)	<u>10</u>	<u>27 to 170</u>	<u>6.6 to 8.6</u>	<u>3 to 82</u>	<u>ND to 0.16</u>	<u>ND to 0.027</u>	<u>ND to 17</u>
	Source: Stanford University							

ND = Not detected

Response to Comment 111-15

Comment Summary: The comment indicates that historic stream flow and gaging data is available to a certain extent in project vicinity.

Although stream flow records were sought, none were found for the streams located in the Stanford vicinity. Detailed characterization of historic streamflows was not necessary because the performance standard for the project is no increase in peak 100-year storm runoff to creeks. The focus of the analysis was thus on the design of mitigation for runoff from the project, not on detailed description of historic streamflows.

Response to Comment 111-16

Comment Summary: The comment requests additional detail regarding potential BMPs to prevent water quality impacts.

Responses to this and several other comments regarding mitigation measures to prevent potential water quality impacts have been addressed through revision of Mitigation Measure HWQ-3: Protect Water Quality and Mitigation Measure HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution in the Final EIR. Refer to Response to Comment 2-1.

Response to Comment 111-17

Comment Summary: The comment asks whether the County wishes to accept liability in the event of more flooding in the Stanford vicinity.

Responses to this and several other comments regarding the measures that the County will require Stanford to take to prevent downstream flooding have been addressed through revision of Mitigation Measure HWQ-1: Manage Stormwater Runoff in the Final EIR. Refer to Response to Comment 14-11.

Response to Comment 111-18

Comment Summary: The comment states that the Draft EIR cannot examine the CP proposed Open Space and Academic Reserve land use designation without a list of what activities are currently occurring and what would be allowed in these areas.

The Draft EIR assumptions are that no projects with additional land coverage would be allowed under the land use designation. However, page 2-8 of the Draft EIR states that limited lowintensity academic use consistent with the allowable land uses may be allowed at intensities and densities established through a use permit granted by the County. Therefore, the County is recommending that the land use designation be changed to Open Space and Field Research (as defined in the Preliminary Staff Recommendations for the Stanford University CP). This proposed land use designation would ensure that development is limited to uses consistent with research related activities that are dependent on the undeveloped foothill environment. Pages 29 through 30 of the County staff's Preliminary Community Plan provide a detailed description of the allowable uses. Allowable agricultural uses are defined through the County's Zoning Ordinance.

Response to Comment 111-19

Comment Summary: The comment notes that EPA recently developed new standards for fine particulate matter $(PM_{2.5})$

The Federal standard for $PM_{2.5}$ is listed in Table 4.11-1 on page 4.11-4 of the Draft EIR. Mitigation measure AQ-1 on page 4.11-10 addresses construction PM emissions.

COMMENT LETTER 112, ANN NORTON PORTER AND RICHARD P PORTER, 8/7/00

Response to Comment 112-1

Comment Summary: The comment states that there are other housing alternatives available other than the ones suggested. Adding parking structures to free up space and semi high-rise structures are other options.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

Response to Comment 112-2

Comment Summary: The comment states that the availability of golf courses in the Stanford vicinity are limited when compared to the dense population, and that the Stanford golf course is similar to public courses in the amount of play that it receives annually. The course should be protected because of its recreational and historic values to the community.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign and Master Response 8, Historical Significance of Golf Course.

Response to Comment 112-3

Comment Summary: The comment expresses concern about noise impacts of trucks delivering horse feed at the Red Barn and odors from horse manure affecting proposed housing adjacent to the stable area.

New housing directly facing the Red Barn may receive intermittently high noise levels from trucks. However, other mobile noise sources such as Campus delivery trucks and trash pick-up trucks would be more dominant than feed trucks. Therefore, the noise contribution from trucking horse feed is not considered to be significant. There is no documented history of odor complaints for Stanford facilities (see Draft EIR page 4.11-15), which include the existing equestrian use of the Red Barn. Odor impacts are thus not expected to be associated with continued operation of the equestrian facilities

COMMENT LETTER 113, WINTHROP S. REIS, 8/7/00

Response to Comment 113-1

Comment Summary: The comment states that the County should not grant Stanford its request to re-zone the golf course from open space to developable land. The comment continues that it is not necessary to develop on the golf course to meet the housing and academic needs of the University. The comment recommends that the area between the Football Stadium and Stanford Shopping Center, bounded by El Camino Real, Galvez, Quarry, and Campus Drive, with the exception of the Stanford family mausoleum, be developed before the golf course.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

Response to Comment 113-2

Comment Summary: The comment states that the Draft EIR provides no specifics about relocation of golf course Hole #1, and that relocation will impact recreation, biological resources and historic resources.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign and Master Response 8, Historical Significance of the Golf Course.

COMMENT LETTER 114, BILL KREPICK, 8/7/00

Response to Comment 114-1

Comment Summary: The comment opposes the University's proposal to rezone the first 7 holes of the golf course from open space to academic use because of its historic, environmental protection, and recreational values.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, Master Response 7, Biological Impacts of Golf Course Redesign, and Master Response 8, Historical Significance of Golf Course.

Response to Comment 114-2

Comment Summary: The comment states that other alternative for housing includes lands adjacent to the golf course that are being used for landfill, occasional equestrian events. The lands near the intersection of Junipero Serra and Page Mill, on the Palo Alto side of the #2 golf hole, and the north side of intersection of Junipero Serra and Campus Drive are all reasonable sites.

Refer to Master Response 4, Alternative Housing Sites. An alternative to locate housing at the intersection of Page Mill and Junipero Serra is discussed on page 7-58 of the Draft EIR. It was rejected because of open space and potential biological impacts. Land on the Palo Alto side of

÷.

Golf Course Hole #2 is in an area where housing is currently precluded by the Sand Hill Road Development Agreement. The area north of the intersection of Campus Drive West and Junipero Serra is the driving range and golf course, which are proposed as a housing sites (Sites F and O).

Response to Comment 114-3

Comment Summary: The comment states that alternative sites within the inner campus should be used for development to reduce environmental impacts that will result from use of golf course and open space lands.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

Response to Comment 114-4

Comment Summary: The comment states that changes in the open space designation of the golf course affect not only Santa Clara County, but San Mateo County as well, and as such, potential impacts should be taken to the San Mateo County Planning Commission.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign and Master Response 8, Historical Significance of Golf Course.

The effects of golf course reconfiguration will not result in any impacts in San Mateo County that cannot be mitigated to a less than significant level. If necessary, project-specific review of the golf course reconfiguration will be referred to San Mateo County for comment.

COMMENT LETTER 115, KENNETH R. STALDER, PH.D., 8/7/00

Response to Comment 115-1

Comment Summary: The comment states that the Stanford golf course should not be tampered with because of its environmental habitat, recreational open space, and value as one of America's classic courses. Further, development of Hole #1 would lead to further development on each of the next six holes.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign, Master Response 7; Biological Impacts of Golf Course Redesign and Master Response 8, Historical Significance of Golf Course.

Response to Comment 115-2

Comment Summary: The comment states that the Stanford golf course driving range provides an essential fresh-air recreational facility for Stanford students, faculty and staff, and the general public.

Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign. The CP/GUP proposes a site for the relocation of the driving range immediately north of the existing holes 3 and 4 (Figure 7-3). Relocation of the driving range and reconfiguration of holes one through seven would not result in any environmental impacts that could not be mitigated to less than significant levels.

Response to Comment 115-3

Comment Summary: The comment states that Stanford should pursue alternatives, including redeveloping other areas within the campus, near the campus, and along other undeveloped corridors near Junipero Serra Blvd. and Willow Road to avoid alteration of the golf course.

Refer to Master Response 3, Intensified Development Alternative and Master Response 4, Alternative Housing Sites.

COMMENT LETTER 116, KIRSTEN FLYNN, 8/7/00

Response to Comment 116-1

Comment Summary: The comment expresses concern that added trips generated by the CP/GUP would send traffic into gridlock.

Section 4.4 of the Draft EIR has modeled traffic impacts of the project and has proposed mitigation measures, including a "no net new commute trips" standard that would reduce traffic impacts at most intersections. Nevertheless the Draft EIR has concluded that traffic impacts are a significant unavoidable impact of the project.

Response to Comment 116-2

Comment Summary: The comment questions the efficacy of present California tiger salamander mitigation strategy being conducted by Stanford.

The Draft EIR requires that any new habitat areas for California tiger salamander (CTS) be demonstrated to be successful before construction on existing CTS habitat is allowed. Refer to Mitigation Measure BIO-1(a) through (e) on pages 4.8-28 through 4.8-33. Option 2 requires that replacement habitat be demonstrated to be successful before construction on existing habitat areas starts. Also refer to Master Response 11, Biological Resource Impacts to California Tiger Salamander.

Response to Comment 116-3

Comment Summary: The comment states that the Carnegie Foundation Project should be considered together with the GUP.

The Carnegie Foundation Project is considered as part of the analysis of cumulative impacts of the GUP.

Response to Comment 116-4

Comment Summary: Stanford needs to at least entertain the idea of providing support for a new middle school.

Stanford has identified a potential school site on Stanford lands. It is beyond the scope of this EIR to evaluate the adequacy of specific sites for schools or whether the University should provide a site or other support for a middle school. Refer to Response to Comment 80-3.

Response to Comment 116-5

Comment Summary: The comment states that the area west [south] of JSB should be permanently protected as open space.

Refer to Master Response 9, Additional Open Space Protection.

COMMENT LETTER 117, JOHN (LAST NAME NOT PROVIDED), 8/7/00

Response to Comment 117-1

Comment Summary: The comment states that alternative sites should be considered for housing instead of Hole #1 of the golf course. If Hole #1 is indeed sacrificed, the hole must be replaced.

Refer to Master Response 3, Intensified Development Alternative and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 118, AMY LARSON, 8/7/00

Response to Comment 118-1

Comment Summary: The comment states that Stanford open space should remain open.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 9, Additional Open Space Protection.

Response to Comment 118-2

Comment Summary: The Academic Growth Boundary should be consistent with Palo Alto's Urban Service Boundary (along Junipero Serra Blvd. and excluding the golf course) and should be made permanent.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

Response to Comment 118-3

Comment Summary: The comment states that the area outside of the Academic Growth Boundary should be changed from "Academic Reserve and Open Space" to "Open Space and Field Research" as recommended by County staff. Refer to Master Response 1, Statement for or Against the Project or Project Components.

The Draft EIR includes an alternative component (LU-C) that would change the CP proposed Open Space and Academic Reserve land use designation with the Open Space and Field Research land use proposed in the comment.

Response to Comment 118-4

Comment Summary: Stanford should continue its policy of no net new commute trips.

The County is proposing to continue the no net commute trips policy. Refer to traffic mitigation measure TR-5 on pages 4.4-92 through 4.4-97.

COMMENT LETTER 119, RICHARD STULTZ, 8/7/00

Response to Comment 119-1

Comment Summary: The comment states that Stanford could build up by replacing parking lots with multi-story parking structures to free up room for more housing.

Refer to Master Response 3, Intensified Development Alternative aned Master Response 4, Alternative Housing Sites.

Response to Comment 119-2

Comment Summary: The comment opposes development on the golf course and recommends concentration of development in the core campus.

Refer to Master Response 1, Statement for or Against the Project or Project Components; Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign; Master Response 7, Biological Impacts of Golf Course Redesign; Master Response 8, Historical Significance of the Golf Course and Master Response 3, Intensified Development Alternative.

COMMENT LETTER 120, KAY CORNELIUS JEANQUARTIER, 8/7/00

Response to Comment 120-1

Comment Summary: The comment states that the golf course should be preserved because of its historic value.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 8, Historical Significance of the Golf Course.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

Response to Comment 120-2

Comment Summary: The comment states that the golf course provides a serene place of beauty where both the body and mind can be exercised and that other plans should be developed to keep the course intact.

Refer to Master Response 3, Intensified Development Alternative and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

COMMENT LETTER 121, DEBORAH CLARK, 8/7/00

Response to Comment 121-1

Comment Summary: The comment states that development should not be allowed outside of the City and County's urban growth boundary and expresses concern over the impact that the CP/GUP will have on housing, traffic congestion, air quality, infrastructure, threatened species and open space.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.

The Draft EIR addresses each of the issue areas of concern and recommends mitigation measures or alternatives to reduce identified impacts.

Response to Comment 121-2

Comment Summary: The comment states that the open space area near the "Dish" is a precious place for people to relieve stress and should be permanently protected.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 121-3

Comment Summary: The comment requests more stringent mitigation, or reduction in project scale and permanent protection of the foothills.

The Draft EIR has considered feasible mitigation measures for the identified impact of the CP/GUP. A Reduced Project alternative was evaluated in Chapter 7 of the Draft EIR. Refer to Master Response 2, Reduced Project Alternative and Master Response 9, Additional Open Space Protection regarding protection of the foothills.

COMMENT LETTER 122, KATHERINE ABU-ROMIA, 8/7/00

Response to Comment 122-1

Comment Summary: The comment states that there are high vehicle volumes and speeds on Hawthorne Avenue, presenting a danger residents and expresses concern that with continued extensive development of Stanford, the situation will degrade even further.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

As indicated in the Responses to Comments 14-1, 14-6, 62-1, 98-2, and mitigation TR-6A on page 4.4-106 of the Draft EIR, Stanford shall participate in any future neighborhood traffic studies initiated by the City. Stanford will then be responsible for its fair share of any mitigation measures. These mitigation measures could include traffic calming.

COMMENT LETTER 123, CHRIS STROMBERG, 8/7/00

Response to Comment 123-1

Comment Summary: The comment states that in figure 4.4-16 of the Draft EIR, the placement of cordon intersection 12 on Escondido Road just north of Stanford Avenue will mean counting a significant number of trips that are generated by Escondido Elementary School and day care facilities on Escondido Road. Escondido Road is blocked off just north of the Elementary school and the only access to the campus is via Olmsted Road. If the cordon is moved to Olmsted Road, all of the campus trips will continue to be counted, but trips from the elementary school and day care facilities will not be counted.

This information is appreciated and may lead to an adjustment of the exact cordon point. It should also be noted that license plate matching should be able to eliminate pick-up/drop-off type trips from the count. This would not, however, eliminate counting of employees at the school or day care facilities.

Response to Comment 123-2

Comment Summary: The comment states that Figure 7-2 is mislabeled.

The comment is correct. Land use designations LU-B, LU-C and LU-D were all incorrectly labeled. A revised Figure 7-2 is included in the Draft EIR Errata Chapter.

Response to Comment 123-3

Comment Summary: The comment states that the reduction in traffic due to 1,200 graduate students moving seems to be questionable. The net reduction was only 65 peak hour peak hour trips per day. This seems to assume that graduate students do not commute to campus during the peak times, yet that they make local runs during peak times. If the assumption is going to be made that graduate students avoid commute times for getting to campus, it would seem reasonable that the same assumption be made about their local trips.

No specific assumptions were made about the commute or local trip behavior for graduate students. Instead, a trip generation study was performed based on cordon line counts as discussed on page 4.4-52 of the Draft EIR.

Response to Comment 123-4

Comment Summary: The comment states that the County is strongly encouraged to find that housing site D and I, with the proposed mitigation, are appropriate housing for graduate students, (site D) medical residents and post-doctorate (site I).

This comment recommends County action in approving the University's General Use Permit and does not directly relate to the adequacy of the Draft EIR. Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 4, Alternative Housing Sites. It should be noted that, while the Environmentally Superior Alternative included elimination of the Lower Knoll (Site J), it also recommended that these 200 units be relocated to Escondido Village.

Response to Comment 123-5

Comment Summary: The comment states that it is not clear that all of this housing will be able to be built, especially given the densities at some sites. The number of faculty/staff units that would be required within 6 years is larger than the low-end range that Stanford proposed. The "triggers" on faculty/staff housing must be looked at very carefully so that they aren't unrealistic, given Stanford's proposal.

The County will have discretion to develop General Use Permit Conditions that consider constraints on developing housing, and credit Stanford for reasonable efforts to develop housing.

Response to Comment 123-6

Comment Summary: The comment states that the assumption that every housing site that is proposed will available is not valid. Some consideration must be given to the very likely case that some of these sites will become unavailable, either in the EIR process or later.

Refer to Response to Comment 123-5. The EIR has also looked at additional housing options. Refer to Master Response 4, Alternative Housing Sites.

Response to Comment 123-7

Comment Summary: The comment states that Stanford should be held accountable for what Stanford has control over and not hold Stanford accountable for things that Stanford cannot control. This will release Stanford's responsibility for delays and law suites that might be filed against then.

Mitigation PH-3 in Chapter 4.3 of the Draft EIR contains recommended conditions that link housing production to the construction of academic space. The EIR recognizes that the University should identify additional sites for housing. Refer to Response to Comment 123-5.

Response to Comment 123-8

Comment Summary: The comment states that one way to take some of the burden off Stanford would be require it to apply for the housing and to show that it has the funding for the housing.

Refer to Responses to Comments 123-5 and 123-7. As part of the condition that Stanford construct housing prior to, or concurrently with, the development of academic space, the County can also permit the University to provide evidence of circumstances beyond its control that will delay the construction of housing.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

COMMENT LETTER 124, JASON MARSHALL, ASSISTANT DIRECTOR, DEPARTMENT OF CONSERVATION, OFFICE OF GOVERNMENTAL AND ENVIRONMENTAL RELATIONS, DIVISION OF MINES AND GEOLOGY, 8/7/00

Response to Comment 124-1

Comment Summary: The comment states that Section 4.6 does not state what the earthquake ground motion for the plan area is predicted to be, but that the Draft EIR includes a description of the Modified Mercalli Scale (Table 4.6-2) which has no value for structural design. The comment cites an authoritative journal article for correlating MMI with Peak Ground Acceleration, recommends that MMI be replaced with specifically calculated ground motion, and recommends that the maximum MMI of VIII in the Draft EIR should be corrected to a MMI of IX.

The review comments are incorporated into the Final EIR and, thereby, become part of the planning documentation that must be considered in engineering design for future Stanford campus buildout projects. It is not the function of an EIR, especially a program level EIR, to accomplish engineering design tasks or exhibit design details such as response spectra. On the other hand, the EIR should demonstrate the process that will be used to plan and design future projects. The design process required by the UBC is described in more detail in this Final EIR. Refer to Responses to Comments 124-2 and 124-4 below. The Modified Mercalli Intensity (MMI) has value in that it describes earthquake damage to the public in human perception terms. MMI is de-emphasized by eliminating some of the discussion and modifying the Draft EIR as follows in response to the second paragraph of the comment.

The Draft EIR is revised as follows:

Page 4.6-5. The text of the first paragraph is revised to read:

The intensity of on-site shaking is a function of the potential magnitude of an earthquake and the distance of the project area from the event. In the event of a large earthquake on either the San Andreas, Calaveras, or Hayward fault, the project area could experience "very strong" seismic shaking (ABAG 1999 and Borcherdt, Gibbs, and Lajoie 1975). This rating corresponds generally to maximum levels of VIII to IX on the Modified Mercalli (MM) Scale, which relates to human perception and amount of damage. ...

Page 4.6-5. The text of the second paragraph is revised to read:

The project area experienced widespread MM intensity VII and localized MM VIII shaking during the Loma Prieta earthquake in 1989 and probable MM intensity VIII in 1906. MM VIII is the intensity at which major structural damage begins to take place. However, major financial losses due to damage of building contents can occur at Intensity VII. In 1989, extensive and very costly damage occurred on the Stanford Campus due to an earthquake of less severity than the anticipated maximum earthquake for the San Andreas fault. A recent publication developed new equations relating site ground motion parameters of Peak Ground Acceleration (PGA) and Peak Velocity (PGV)

OCTOBER 2000

with MMI (Wald and others 1999). According to this work, MMI IX correlates with site PGA in the range of 0.65g to 1.24g and PGV in the range of 60 to 116 centimeters per second.

While not intended as seismic ground motion criteria for engineering design, Table 4.6-1 provides estimates of maximum probable magnitudes for earthquakes originating on the capable faults in the project area and fault classifications suitable for determining seismic ground motion criteria for project engineering design. Seismic parameters for the Design Basis Earthquake (DBE = 10% probability of exceedance in 50 years) for the Stanford vicinity will be calculated using procedures of UBC 1997/CBC 1998.

Page 4.6-9. The text is revised to read:

Seismic Hazards Co Seismic Deformation

Seismic hazards include ground shaking, surface rupture and related ground deformation along active faults, liquefaction, and shaking-induced differential settlement. Strong ground shaking can damage structures, their foundations, and contents as well as cause injury to occupants. Strong ground shaking may also trigger secondary effects such as liquefaction or ground settlement in some areas. Ground shaking intensity of VIII on the Modified Mercalli Scale (Table 4.6-2) could damage well built structures.

Damage due to surface rupture and related ground deformation (e.g. cracking, bending, and buckling) is limited to the actual surface location of the fault rupture, unlike damage from ground shaking that can occur at significant distances from the source fault. Surface rupture can damage buried pipelines that have not been especially protected where they cross fault traces.

A zone of special consideration for possible coseismic ground deformation has been established along the lower hinge of the Stock Farm Monocline where it crosses the Stanford Campus. The cause of the deformation would be coseismic slip on a blind thrust fault at depth below the Stock Farm Monocline. Several centimeters of deformation along the trace of the lower hinge were predicted in a study by Dames and Moore (1995a). The effects, which could damage building foundations, would be several centimeters of uplift, tilting and crumpling (shortening) of the ground surface.

Liquefaction

A hazard related to severe ground shaking...

The following items are added to the References section of Chapter 8 of the Draft EIR:

CDMG 1996. Probabilistic Seismic Hazard Assessment for the State of California, CDMG Open-File Report 96-08. 18 December

Wald, D.J., Quitoriano, V., Heaton, T.H., and Kanamori, H. 1999. Relationships between Peak Ground Acceleration, Peak Ground Velocity, and Modified Mercalli Intensity in California, Earthquake Spectra, V. 15, No. 3, pp. 557-564. August

OCTOBER 2000

Response to Comment 124-2

Comment Summary: The comment states that the earthquake ground motion for the Stanford campus is high due to proximity to several major faults, most notably the San Andreas fault and cites the UBC 1997 data from USGS Open-File Report 99-517.

The comment is correct. These parameters and references will be incorporated in the text and shown in Table 4.6-1.

The Draft EIR is revised as follows:

Pages 4.6-1 through 4.6-2 the text starting with the section on Active Faults is revised to read:

Active Faults

The San Francisco Bay Area is a seismically active region dominated by movement along active, predominantly right lateral, strike-slip, northwest-trending faults of the San Andreas system. Three major active branches of this fault system, the San Andreas fault, the Hayward fault, and the Calaveras fault are located close enough to the Stanford campus to produce strong seismic ground motions in the project area. Figure 4.6-1 shows the location of the project area relative to the major faults. Table 4.6-1 summarizes data on active faults in the area. Throughout the following discussion, earthquake magnitudes reference the Moment Magnitude Scale, which has been found in recent years to best describe large earthquakes (M \geq 6.5). Richter Magnitude measures the amount of shaking generated by the earthquake, while Moment Magnitude measures the extent of rupture produced by a seismic event.

San Andreas Fault

In the past, the San Francisco Peninsula segment of the fault ruptured with large magnitude earthquakes in 1838 (estimated Richter magnitude 7) and in 1906 (magnitude $7.9 \, 8.25$). In 1989, the magnitude 6.95 Loma Prieta earthquake was centered on a closely related subordinate fault and caused severe damage and loss of life in Oakland and San Francisco more than 60 miles from the epicenter. The 1906 and 1989 earthquakes also caused extensive property damage on the Stanford campus. Damage to some buildings on campus from the 1989 earthquake has yet to be repaired.

Despite the occurrence of the Loma Prieta earthquake, the probability of another magnitude 7 event occurring on the San Andreas fault in the San Francisco Bay Area in the next 30 years is estimated to be 21 percent (Working Group on California Earthquake Probabilities 1999). The maximum eredible earthquake magnitude is considered to be 7.1 for the Peninsula segment of the San Andreas (CDMG 1996) and 7.9 for the 1906 rupture segment . Slip rates for these two segments of the San Andreas fault are assessed as 17+3mm/year and 24+3mm/year, respectively. magnitude 8.3 to 8.5.

Hayward Fault

The Hayward fault is approximately 65 miles long and extends from San Pablo Bay to southeastern San Jose where it probably converges with the Calaveras fault. The total ongoing seismic fault strain accumulation which is periodically released in earthquakes has been evaluated to be 9.0 mm per year (Working Group on California Earthquake Probabilities 1999). Magnitude 7 earthquakes occurred on the Hayward fault in 1836 and 1868. Little is known about the first of these events except that it ruptured the northern part of the fault in the vicinity of Berkeley and Oakland. The October 21, 1868 earthquake had 3 feet of horizontal fault displacement and had a total rupture length of at least 20 miles. The 1868 earthquake was centered in Hayward and caused soil liquefaction and severe damage to communities situated along the fault as well as in San Jose and San Francisco. The probability of a magnitude 7 earthquake occurring again on the Hayward fault in the next 30 years has been assessed as 23 percent (Working Group on California Earthquake Probabilities 1999). The maximum eredible earthquake is considered to be about magnitude 7.<u>1</u>5.

Calaveras Fault

The Calaveras fault extends about 100 miles from Concord to Hollister where it merges with the San Andreas fault zone. The Calaveras fault is considered to be capable of generating a magnitude <u>6.87.3</u> maximum credible earthquake (<u>CDMG 1996Slemmons and Chung 1982</u>) for the fault segment north of Calaveras Reservoir. In recent decades moderate earthquakes and rapid fault creep have been associated with the segment south of San Jose. The April 24 1984, magnitude 6.2 Halls Valley earthquake and the August 10, 1979, magnitude 5.9 Coyote Lake earthquake originated on the Calaveras fault. The Calaveras fault is also considered to be the source of the July 3, 1861 earthquake of estimated magnitude 6, which caused ground rupture in the San Ramon and Amador valleys.

San Gregorio Fault

The San Gregorio fault lies about 10 miles to the southwest of the San Andreas fault and is capable of an earthquake of <u>maximum</u> magnitude 7.3, <u>but with a longer recurrence</u> interval than the other major faults in the Bay Area (Table 4.6-1). This fault generated several moderate earthquakes in the Monterey Bay area in 1926, but the northern portion in San Mateo County has caused only microearthquakes in historic time.

Page 4.6-5. Table 4.6-1 is revised to read:

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

Table 4.6-1

Active Faults in the Project Area

Fault	Distance ¹ (miles)	<u>Maximum</u> <u>Magnitude³ (Moment <u>Magnitude</u> <u>Scale)</u> Probable Large Earthquake <u>Magnitude</u> (Richter Scale)</u>	Fault Slip <u>Rate³ (mm/yr)</u>	Estimated Recurrence Interval ³ (years)	<u>Seismic</u> <u>Source</u> <u>Type⁴</u>
San Andreas	2 to 5	7.2 >7	<u>17+4</u>	<u>220</u> 170	A
Hayward	12	<u>7.1</u> 7.0	<u>9+2</u>	<u>236</u> 200	A
Calaveras	17	<u>7.0</u> 6.3	<u>6+2</u>	<u>324</u> 100	A
Monte Vista	<1	<u>6.8</u> 6.5+	<u>0.4+0.3</u>	<u>2410</u> 1000?	<u>B</u>
Blind (Concealed) Thrust Fault Beneath Stock Farm Monocline	5 ²	5.5	<u>0.1 to 0.5</u>	200	<u>C</u>
San Gregorio	14	<u>7.3</u> 7.5	<u>5+2</u>	<u>438</u> 800	A
Greenville	30	<u>6.9</u> 6.8	<u>2+1</u>	<u>1057</u> 3500	<u>B</u>
Rogers Creek	50	$\frac{7.1}{6.9}$ Sources of	<u>9_2</u>	236 250 Pames & Moore (1995), Wo	<u>A</u> odward-
	Clyde Consultants (1995a), Kovach and Page (1995), Jim Baker, Santa Clara County Geologist (personal communication 2000)				

1. Distance from fault to nearest portion of project area; for the San Andreas fault the distances shown are to the nearest and farthest corners of the Stanford Community Plan boundary.

2 Distance of Blind Thrust is vertical (depth beneath the site)

3. Information mostly from WGCEP (1999) except Monte Vista and Blind Thrust Fault. Recurrence time is for any large earthquake M> 6.7

4. Seismic Source Type for use in seismic design according to UBC 1997/CBC 1998

Response to Comment 124-3

Comment Summary: The comment suggests that the document refer to the California Division of Mines and Geology's Special Publication 117 (Guidelines for Evaluating and Mitigating Seismic Hazards in California) for liquefaction and strong ground motion.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR RESPONSE TO COMMENTS

The publication has been reviewed and is cited as appropriate guidance for project-specific site investigations, seismic hazard evaluations, and hazard mitigation in the Final EIR in Table 4.6-B as a guidance document and in Section 4.6.C analyses paragraphs for Impacts G&S-2 (seismic ground shaking) and G&S-4 (liquefaction) as follows:

The Draft EIR is revised as follows:

Pages 4.6-13 and 4.6-14 Table 4.6.3 is revised to include the following references as justification:

Table 4.6-3

Evaluation Criteria	As Measured By	Point of Significance	Justification
1. Will project facilities be damaged by ground surface rupture and related fault deformation?	Hazards associated with location of facilities within an Alquist-Priolo Earthquake Fault Zone or other designated surface rupture zone	Greater than 0 structures without appropriate seismic design features located within an earthquake fault zone	Santa Clara County Geologic Hazard Zone Maps Alquist-Priolo Earthquake Fault Zones Act. CDMG mapping of other fault zones Santa Clara County Environmental Evaluation Checklist Item F(a)(i)
2. Will earthquake-induced strong ground shaking damage Project facilities?	Structural design and construction not in conformance with requirements of seismic design standards	Greater than 0 structures not in compliance with the provisions of the Uniform Building Code Greater than 0 structures of unique design not covered by the ordinary provisions of the Uniform Building Code	Santa Clara County Building Permit Dept. plan review Santa Clara County URM Ordinance Uniform Building Code (1997) with California amendments (1998) Santa Clara County Environmental Evaluation Checklist Item F(a)(ii) <u>California Division of Mines and Geology (CDMG) Guidelines (1997)</u> <u>Chapter 4</u>

Table 4.6-3

Evaluation Criteria with Points of Significance – Geology and Seismicity

Evaluation Criteria	As Measured By	Point of Significance	Justification
3. Will project facilities be damaged by co-seismic ground deformation?	Hazards associated with location of facilities within Stock Farm Monocline zone	Greater than 0 structures without appropriate seismic design features located within designated zone of potential co- seismic deformation	Santa Clara County Geologic Hazard Zone Maps Dames and Moore (1995) map Stock Farm Monocline Agreement (Zone map maintained by Santa Clara County Planning Department) Santa Clara County Environmental Evaluation Checklist Items F(a)(iii)
4. Will project facilities be damaged by liquefaction or settlement during an earthquake?	Hazards associated with CDMG rating of potential for liquefaction, or more detailed geo- technical assessment of liquefaction potential (CDMG Guidelines 1997)	Greater than 0 structures without appropriate seismic design features located within an area high risk for liquefaction or settlement	Santa Clara County Geologic Hazard Zone Maps (1978) Santa Clara County Environmental Evaluation Checklist Items F(a)(iii) State Seismic Hazard Map Program Maps (pending) <u>CDMG Guidelines (1997) Chapter 6</u>
5. Will project facilities be damaged by unstable slope conditions?	Hazards associated with location in an area of moderate to high landslide risk, defined by Santa Clara County, including roads with slopes greater than 20% and buildings on slopes greater than 30 percent	Greater than 0 structures located within an area of moderate to high landslide risk without appropriate slope stabilization	Santa Clara County Geologic Hazard Zone Maps Santa Clara County Environmental Evaluation Checklist Items F(a)(iv) and (c) and G(k) and (l) State Seismic Hazard Map Program Maps (pending) <u>CDMG Guidelines (1997) Chapter 5</u>

Table 4.6-3

Evaluation Criteria with Points of Significance – Geology and Seismicity

Evaluation Criteria	As Measured By	Point of Significance	Justification
6. Will project facilities be exposed to damage due to expansive soils or soils with moderate to high erosion potential?	Shrink-swell potential and erosion potential as rated in Santa Clara County Soil Survey (Soil Conservation Service)	Greater than 0 structures not covered by the Uniform Building Code located on soils with a rating of moderate to high for shrink-swell or high for erosion potential	Site-Specific Geotechnical studies USDA Soil Conservation Service (SCS) Report Santa Clara County Environmental Evaluation Checklist Items F(b) and (d)

The following item is added to the References section of Chapter 8 of the Draft EIR:

California Division of Mines and Geology (CDMG) 1997. Guidelines for Evaluating and Mitigating Seismic Hazards in California, CDMG Special Publication 117.

Response to Comment 124-4

Comment Summary: The comment states that the Stanford campus is subject to high earthquake ground motions at two levels derived from the 1997 Uniform Building Code (UBC) and 1998 California Building Code (CBC): the Design Basis Earthquake (DBE, applicable to commercial and residential buildings) with PGA = 0.79g and 10% probability of occurrence in 50 years and the Upper Bound Earthquake (UBE, applicable to public schools, hospitals, and essential services buildings) with PGA = 1.02g (10% probability in 100 years). The comment states that the UBE applies to the Stanford Hospital and because it is under permit by the State of California OSHPD.

The Stanford Hospital is not part of the Community Plan/General Use Permit EIR as shown on Figure 2-3, which depicts the CP/GUP boundary. The Hospital is located within the city limits of the City of Palo Alto and the EIR applies only to developments on Stanford property in unincorporated Santa Clara County. Therefore, the higher Upper Bound Earthquake is not required per 1998 CBC Section 1631.6. Stanford complies with the UBC as a minimum requirement and can choose to exceed the requirements at its discretion. Each building permit issued by the County to Stanford is documentation that the building complies with UBC. However, Stanford buildings do not fall into the category of "public schools" as defined by UBC and the County. Any elementary and intermediate public school facilities built on Stanford property would be built and owned by the Palo Alto Unified School District.

Discussion of possible design ground accelerations has been added to Section 4.6.A.2. Refer to Response to Comment 124-1 above.

Response to Comment 124-5

Comment Summary: The comment objects to the use of terms such as "maximum credible earthquake" and requests use of terminology of the Uniform Building Code.

In Section 4.6.A Setting and in Table 4.6-1, the terminology for maximum earthquakes has been revised to be consistent with the current UBC terminology. Refer to Responses to Comment 124-1 and Comment 124-2.

Response to Comment 124-6

Comment Summary: The comments states that the problem of liquefaction on the Stanford campus needs to be adequately quantified. Campus buildings will suffer vertical settlements (total and differential) during a seismically-induced event that includes liquefaction. The comment refers to Chapter 5 of the Division's Special Publication 117 with respect to liquefaction assessments.

The Final EIR will cite CDMG publication SP117 (Chapter 6, Analysis and Mitigation of Liquefaction Hazards) as guidance for scoping liquefaction assessments and add text. Reference will be made in the following locations in the Final EIR: in Table 4.6-3, item 4 and in Section 4.6C, Impacts and Mitigation Measures, as described in Response to Comment 124-7 below.

Response to Comment 124-7

Comment Summary: The comment states disagreement with the conclusions of Section 4.6C, Impacts and Mitigation Measures; i.e. that the ground motion and liquefaction impacts of this project are reduced to 'less than significant' levels. The structural impacts from the 1989 Loma Prieta earthquake on Stanford campus buildings were significant. Yet the campus will be subjected to double or triple the 1989 ground motion when the earthquake is centered on the nearby San Andreas Fault. The comment recommends that the seismic impacts of this project be identified as 'potentially significant unless mitigation incorporated.' Earthquake ground motion and seismically-induced liquefaction are serious geologic hazards for the Stanford campus and should be addressed as such in the final EIR and the Community Plan.

The County does not agree that seismic impacts associated with new development under the CP and GUP are potentially significant, or that special mitigation measures are required for the Stanford campus. Numerous studies have shown that with appropriate design liquefaction is not a hazard at Stanford, and County procedures and ordinances are in place that ensure that seismic hazards will not pose a significant risk. As described on page 4.6-12 of the Draft EIR, the County maintains geologic hazard maps that map hazards including liquefaction, and any project in a high hazard zone must have an engineering geologic report submitted to the County before approval. Thus, County procedures determine when liquefaction assessments are needed. The County's policy for identification of impacts does not consider impacts to be significant if there are established procedures and regulatory requirements that would prevent those impacts. To clarify these requirements, additional language is added to the impact discussion.

The Draft EIR is revised as follows:

Pages 4.6-15 and 4.6-16, Section 4.6.C, Impacts and Mitigation Measures, Impacts G&S-2 and G&S-4, are revised to read:

IMPACT: G&S-2: Will earthquake-induced strong ground shaking damage project facilities?

Analysis: Less than Significant

Large earthquakes caused extensive property damage at the project site in 1906 and in 1989. There is a high probability that another major earthquake event will occur within the next 30 years. However, planning, design, and construction of all new structures and support facilities are carried out <u>on a project-specific basis</u> according to California and Santa Clara County standards. These include the Santa Clara County Unreinforced Masonry Ordinance and the 1997 UBC with 1998 California amendments with stringent peer review for major structures. The main objectives of seismic design measures are to prevent building collapse, limit property damage, and minimize risk to human life and health. Assuming that these objectives are met, seismic shaking hazards would be less than significant. The residual damage level would be acceptable within California standards. <u>Compliance with existing County procedures and regulatory requirements make the impact less than significant.</u>

IMPACT: G&S-4: Will project facilities be damaged by liquefaction or settlement during an earthquake?

Analysis: Less than Significant

Portions of the project site, particularly the northern third of the project site, are designated as having moderate to high potential for liquefaction due to shallow groundwater and/or low-density, compressible soils. Areas immediately adjacent to creeks <u>and lakes may also</u> be susceptible to liquefaction-caused lateral spreading resulting in inward movement on properties <u>adjacent to water</u> bodiesalong creek banks. Project-specific, localized screening investigations to assess liquefaction potential will be performed, as needed, followed by more-detailed investigation, testing, and geotechnical analyses following State guidelines (CDMG 1997, Chapter 6).

Engineering designs required by the County Geologist and/or the County Building Inspection Office will include foundation design measures, for example, distributed loadings, deep supports, earthwork, or dewatering to prevent or compensate for deformations that could occur due to liquefaction or earthquakeinduced settlement. With incorporation of these standard measures the impact would be <u>reduced to an acceptable level of risk and is thus</u> less than significant.

COMMENT LETTER 125, DAVID T. SMERNOFF, PH.D., PROJECT DIRECTOR, ARASTRADERO PRESERVE STEWARDSHIP PROJECT, 8/5/00

Response to Comment 125-1

Comment Summary: The comment states that the County should reduce the total square footage of development allowed under this permit.

Refer to Master Response 1, Statement for or Against the Project or Project Components.

Response to Comment 125-2

Comment Summary: The comment states that the County should require long-term (25 year minimum) or permanent dedication of open space.

Refer to Master Response 9, Additional Open Space Protection.

Response to Comment 125-3

Comment Summary: The comment states that the County should withhold determination on the Carnegie Institute application until the CP/GUP are completed.

However, the comment does not address the Draft EIR. Therefore, no response can be provided. The Carnegie project is considered in the EIR's cumulative impact analyses.

Response to Comment 125-4

Comment Summary: The comment states that the County should require dedication of public trail easements through the Stanford foothills to serve as mitigation for unavoidable traffic impacts.

Page 4.2-22 of the Draft EIR includes mitigation measure OS-3: Improvement of Parks and Dedication of Trails. This mitigation measure includes the dedication of trail easements for the trail corridors shown on the County Trails Master Plan.

Response to Comment 125-5

Comment Summary: The comment requests that the housing components include affordable (as distinct from below market rate) units made available to Stanford and other local service employees (teachers, fire fighters, non-profit employees, etc.)

The EIR (Chapter 4.3) evaluates the current affordability of housing and refers to the University's goal that housing it develops for students, faculty, and staff be affordable to those groups (Strategy 1 in the Housing chapter of the draft Community Plan). Neither the draft Community Plan nor the alternatives evaluated in the EIR propose that the University will construct housing for anyone other than students, faculty, and staff, and housing for other must be annexed to the City of Palo Alto under existing requirements. The County could consider

requiring that housing constructed by the University specifically be affordable to students, faculty, and staff as a condition of the GUP.

Response to Comment 125-6

Comment Summary: The comment states that the County should require specific traffic demand management programs, including no net new trips, intersection mitigation money, residential impact study and avoidance plans, and improvements to regional bicycle commute corridors.

Pages 4.4-92 through 4.4-104 of the Draft EIR traffic section include mitigation programs designed to reduce intersection impacts and to meet the "no net new commute trips" goal at Stanford. The measures include intersection improvements and trip reduction programs and monitoring. These measures are considered adequate to reduce impacts to less than significant levels. However, because the effectiveness of the program and the implementation of physical mitigation measures in other jurisdictions cannot be guaranteed by the County, the impact is significant and unavoidable.

Response to Comment 125-7

Comment Summary: The comment states that the County should require a change in underlying zoning of all County controlled land from agriculture to more carefully defined zoning designations that accurately reflect current land use and proposed land use changes.

Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 10, Community Plan Description of Density and Intensity of Development.

Response to Comment 125-8

Comment Summary: The comment states that the County should not permit development in the foothills area, nor permit re-designation of the Lathrop District to core campus. Specifically, the County is legally bound to respect the City of Palo Alto's urban growth boundary in this area.

Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary and Master Response 9, Additional Open Space Protection.

Response to Comment 125-9

Comment Summary: The comment states that the County should require full compliance with Federal and State laws protecting species such as the California tiger salamander and red-legged frog.

Pages 4.8-32 through 4.8-33 of the Draft EIR include mitigation measures designed to protect the California tiger salamander. No impacts have been identified for red-legged frog based upon the land use and development proposals included in the CP/GUP.
Response to Comment 125-10

Comment Summary: The comment states that the County should extend the open space mitigation aspects to include all Stanford foothills property, including current agricultural and grazing leases.

Refer to Master Response 9, Additional Open Space Protection. With the exception of the Lathrop District, the CP proposes the Open Space and Academic Reserve or Special Conservation land use designation for all County lands south of JSB. These lands include current agricultural and grazing leases within County jurisdiction.

Response to Comment 125-11

Comment Summary: The comment states that the County should require the University to engage in a foothills master planning process (including inventory and analysis of all biological resources, trails and public access issues) prior to changes in policies regarding public access.

The CP/GUP does not propose any policies that would result in changes to public access in the Stanford foothills; the Conservation and Use Plan for the Dish area is not a component of the CP/GUP. Therefore, there is no nexus between the recommended plan and the impacts associated with the CP/GUP, and such a plan is outside the scope of the Draft EIR.

Response to Comment 125-12

Comment Summary: The comment states that the County has not done a sufficient job in requiring mitigation for the growth of Stanford over the past several decades, and Stanford should be held to the same standards as any County applicant.

The Draft EIR provides an evaluation of the CP/GUP using the same standards that are used for review of all other County projects. The Draft EIR discloses the impacts associated with the proposed CP/GUP and recommends mitigation measures or alternatives to reduce impacts wherever feasible.

COMMENT LETTER 126, MARY DAVEY, 8/6/00

Response to Comment 126-1

Comment Summary: The comment states that the Draft EIR talks much about the impact for all proposed development – specifically traffic. The comment asks whether it would be possible to tease out the impact/mitigation for all the 3,000 housing units only.

Refer to Master Response 2, Reduced Project Alternative for discussion of a Reduced Academic Development Alternative that includes all of the proposed housing and half of the academic development. An alternative with no academic development has not been included because, without an increase in population, there would be no impact requiring the development of housing.

OCTOBER 2000

COMMENT LETTER 127, TERRY BURNES, PLANNING ADMINISTRATOR, COUNTY OF SAN MATEO PLANNING AND BUILDING DIVISION, 8/9/00

Response to Comment 127-1

Comment Summary: The comment states that the Draft EIR fails to include two San Mateo County projects in the cumulative impact analysis, including the Hewlett Foundation headquarters office building and the Chargin office project, both located near the intersection of Sand Hill Road and Santa Cruz Avenue.

These projects would not change the analysis of impacts presented in the Draft EIR. Environmental review for both projects resulted in a determination that they did not have any significant environmental impacts, and Negative Declarations were issued for both projects. The primary effect of these projects would be an increase in traffic in the area (which was determined not to be significant for either project), and the traffic analysis in the Draft EIR already considers total future cumulative traffic growth in the area. This analysis was based on regional projections, rather than a listing of specific projects, and thus was not affected by the omission of these two projects. Noise and air quality impacts were based on this cumulative traffic scenario, so they would also not be affected by the additional projects. Impacts of these two projects in the areas of land use, geology, biotic resources, water quality, visual and cultural resources are all fully mitigated. The Hewlett Foundation project would remove two large oak trees but would relocate or replace both trees.

The Draft EIR is revised as follows:

Page 6-5. Section 6.3 of Draft EIR (Cumulative Impacts) is revised to include the following projects:

6.3.F San Mateo County Projects

The following large-scale projects were identified within the San Mateo County limits near the Stanford Community Plan boundary.

- <u>Hewlett Foundation Headquarters office building at the Southwest corner of Sand Hill Road</u> and Santa Cruz Avenue is a 48,000 square-foot office building located on a 6-acre site immediately west of the Community Plan boundary. The San Mateo Planning Commission recently approved a use permit for this project and the County expects construction to proceed within approximately six months.
- <u>Chargin office project at the Northwest corner of Sand Hill Road and Santa Cruz Avenue</u> includes remodeling of an existing 2,500-square foot house and construction of 1,400 square feet office of new commercial space located immediately west of the Community Plan boundary. The County recently circulated a Negative Declaration for this project. Hearings will be held before both the San Mateo Planning Commission and Board of Supervisors for this project.

OCTOBER 2000

COMMENT LETTER 128, DONALD A. PHILLIPS, ED.D., SUPERINTENDENT OF SCHOOLS, PALO ALTO UNIFIED SCHOOL DISTRICT, 9/15/00

This letter was sent to the County to replace the School District's original letter (Letter 91 in this Response to Comments Chapter). Responses to Letter 91 have been modified based on this updated letter. No response to this letter is necessary.

COMMENT LETTER 129, DAVID J. NEUMAN, UNIVERSITY ARCHITECT AND VICE PROVOST FOR PLANNING, STANFORD UNIVERSITY, 9/27/00

This letter was sent to document the how Stanford intends to conduct the reconfiguration of the golf course. The reconfiguration would only be needed if faculty/staff housing is proposed for Hole #1. The provisions in this letter are referenced in Master Response 7, Biological Impacts of Golf Course Redesign. No response to this letter is necessary.

12.4 ORAL COMMENTS

On August 3, 2000, The County of Santa Clara Planning Commission held a public hearing on the Stanford University CP/GUP Draft EIR. Forty-six persons commented on the Draft EIR at the hearing. The comments of each speaker are provided in the table below along with a response.

Speaker Comment	Response
Walter Hays, Peninsula Conservation Center Foundation	
• Open Space - Lathrop Development would be significant and unavoidable. Academic growth boundary should be modified and no development should occur.	Alternative components have been identified that would avoid the significant impacts of the proposed project on open space.
• Modify AGB-should be same as Palo Alto urban services boundary.	Refer to Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.
• Travel demand system must retain trips at current levels.	The Draft EIR includes the no new net commute trips goal as part of the mitigation program.
• Traffic-require TDM and no net new commute trips.	Per law, the County cannot mandate employee TDM measures. However, the no new net commute trips goal is included in the mitigation program.
• Housing - make Stanford provide housing for all people that will come with new plan.	The Draft EIR states that Stanford should be required to provide housing for all people that will come with the new plan.
• Development should not be allowed on CTS habitat until new habitat is successful. The 2 ponds created in past have not worked.	CTS mitigation option 2 includes this requirement.
• Housing – indirect job growth should be mitigated to maximum extent possible.	The Draft EIR proposes the indirect job growth should be mitigated, however impacts are still significant.
Laura Stuchinsky, Silicon Valley Manufacturing Group and Housing Action Coalition	
• Support housing portion of the plan.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
• Stanford should "grow prudently"-provide housing.	The GUP includes housing sites proposed by Stanford.
• Housing would reduce traffic.	Housing does reduce burden on regional traffic.
• More dense housing would help preserve open space.	Refer to Master Response 4, Alternative Housing Sites and Master Response 10, Community Plan Description of Density and Intensity of Development.
Mark Sabin, Palo Alto Chamber of Commerce	Refer to letter 20.
• Provided a summary of Stanford's importance to the area	
• Support's CP housing components	

	Speaker Comment	Response
ø	Wants Stanford to help solve school overcrowding issue.	
Ro the	ger Smith, President, Committee to Save Stanford Golf Course	
8	Told that the golf course would be "safe" as late as March 2000.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
*	A July 25 th forum was held to get Stanford side of issue.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
8	Wants other alternatives studied for housing at Stanford- higher density.	Refer to Master Response 4, Alternative Housing Sites.
	Can't just reconfigure a course like Stanford.	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
9	Wants golf course designated as open space.	Refer to Master Response 9, Additional Open Space Protection.
То	m Jordan, Committee for Green Foothills	Refer to letter 55.
۲	Population count is 34,000 + 2,200	
*	Population cap- CP must deal with population density	
•	Zoning – Existing A1 zone is for single family or agricultural uses. Can't put the proposed density on A1 lands.	
•	Stanford is more dense than surrounding community, has to be dealt with in the EIR.	
٠	AGB-what is current dividing line- it is the line between A1 and A1-20. Why should it be changed? What is the reason?	
\$	Define land use designations in the CP (i.e. OS, etc.)	
•	Alternatives project is insufficient. Should have all housing and ½ academic as an alternative. Not enough analysis of the existing reduced project.	
٠	Schools – Draft EIR should put true impact on schools in document even though the impact may be mitigated by fees according to the law.	
Ma	ary-Lee Kimber, Graduate Student Council	
٠	In favor of more affordable housing, not enough housing for Grad students	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Housing need is personal and affects lives.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Pr As	ia Graves, College Terrace Residents sociation	Refer to letter 14.
٠	Feels that 1989 GUP build out mitigation measures were not effective	

2

	Speaker Comment	Response
•	NNCT – may help commute trips but not trips from new residents	
•	Growth will effect many other issues	
•	Stanford must be held responsible for a quantified standard - these don't exist in the Draft EIR	
•	Research center is not just research uses anymore.	
٠	Research Park use not adequately studied	
•	Parking is a problem in their neighborhood and the cordon line does not capture their neighborhood.	
•	Flooding already occurs today from Stanford flows into the Palo Alto system	
•	Must mitigate the existing problem and then new runoff on top of that	
•	Mid peninsula carrying capacity may have been reached already.	
Pe All	ter Drekmeier, Stanford Open Space iance	Refer to letter 103.
•	Wants permanent protection of the foothills	
•	Pretty good job on GUP, shallow on CP analysis	
•	Need better consideration of long term preservation of California red-legged frog, Steelhead, other candidate species, and Felt Lake	- -
•	Read quote from Supervisor Simitian about possible open space protections	
•	Need higher density development	
•	Need maximum build out plan	
•	Need another alternative for the AGB, make consistent with Palo Alto USB	
•	4.2-1 limit academic development	
•	Need housing sites outside of CTS habitat (i.e., DAPER, West Campus, use of ground level parking areas, Old Mayfield school site, and Research park)	
•	Make housing affordable to faculty and staff	
•	Limit academic development and encourage redevelopment	
•	Housing demand will become worse from indirect impacts	
٠	Stanford is 40% denser than Palo Alto	

	Speaker Comment	Response
9	A one-third increase in campus size would be allowed by GUP in ten years	
8	Should require permanent open space protection	
Sa Pa	lly Probst, League of Women Voters of lo Alto	
8	Support of housing and its benefits	Refer to Master Response 1, Statement for or Against the Project or Project Components.
8	Work to increase density	Refer to Master Response 3, Intensified Development Alternative.
8	Wants to provide housing to all Stanford groups.	The GUP proposes new housing to all Stanford groups.
	Should not be limited by public opinion	Refer to Master Response 1, Statement for or Against the Project or Project Components.
8	CP should look at alternatives to the proposed sites	Refer to Master Response 4, Alternative Housing Sites.
	Should require only good faith effort to build housing before academic expansion.	Refer to Response to Comment 102-8.
8	On campus child care should be required as well to help reduce transportation impacts	For purposes of CEQA, demand for child care is not considered an environmental impact to be analyzed within an EIR (see Draft EIR page 4.10-3).
8	Some limited onsite commercial should also be included	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Be	tty Koski	
•	Was not told about Stanford's desire to develop the golf course.	Refer to Letter 97.
	Keep the golf course as open space	
	Put high density housing in the core campus	
Ge	rry Plunkett	Refer to Letter 57.
	Opposed to loss of hole #1 of golf course	
	Please don't support golf course development	
•	Golf course is a wildlife sanctuary	
•	The golf course provides a wildlife zone for a movement corridor	
•	Golf course serves the community	
٠	Golf course cannot be replaced	
	First hole of golf course is historic	-
Ja	n La Fetra	
•	Club house needs to be close to the first hole	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
•	If the first hole is developed, the next six will follow soon after. Don't let the camel get its nose under the tent.	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.

	Speaker Comment	Response
•	Can't develop next to the creek - keep housing away from creek.	The CP includes a buffer along the creek, which is analyzed in the Draft EIR.
•	More residents will affect Sand Hill Rd. traffic and Menlo Park residents – not adequately addressed in the Draft EIR.	Refer to traffic section of Draft EIR. Increased traffic from proposed housing is factored into the traffic analysis.
Dia	ana Sworakowski, Golf Course Member	
•	Compares Stanford golf course to Yosemite and Yellowstone as a work of art	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
•	Hole #1 is unforgettable and majestic	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
•	Would completely destroy original design and ruin integrity of remaining 17 holes.	Refer to Master Response 8, Historical Significance of Golf Course.
•	Look at other alternatives for housing.	Refer to Master Response 4, Alternative Housing Sites.
•	Preserve golf course as open space.	Refer to Master Response 9, Additional Open Space Protection.
Ma	ry Shaw	
•	Read a passage from a book about the Stanford golf course.	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
•	Don't let Stanford nibble away at the golf course.	Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
На	nk Lawrence	Refer to letter 63.
•	Stanford is a city	
•	Needs to build better infrastructure on their lands (energy, roads, water, etc.).	
•	Opposed to new road alternative	
•	Road to connect traffic from Campus Drive to 280	
•	Stanford should connect Campus Drive West and a new interchange near Alpine using a tunnel under the open space foothills. The tunnel entrance should be placed on the north side of JSB. Submitted a map to diagram the proposal.	
Ar	chie Robinson	
•	The Draft EIR portrays non-compliance with the modern urban land development principals (i.e., infill and redevelopment).	Refer to Master Response 3, Intensified Development Alternative.
•	Should use infill to meet goals.	Refer to Master Response 3, Intensified Development Alternative.
•	Stanford is proposing sprawl, which would affect the golf course.	Refer to Master Response 3, Intensified Development Alternative.

	Speaker Comment	Response
8	The golf course is a legitimate historic resource.	Refer to Master Response 8, Historical Significance of the Golf Course.
9	The golf course meets requirements of CEQA for historic resources (i.e., associated with famous people like Tiger Woods and Mickie Wright and designed by a famous golf course designer - George Thomas).	Refer to Master Response 8, Historical Significance of the Golf Course.
•	If the EIR is certified, the environment will suffer, such as impacts to California tiger salamader.	Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign.
0	Use parking lots or Eucalyptus groves for development instead.	Refer to Master Response 4, Alternative Housing Sites.
Eri	c Jones	
•	Draft EIR does not address the historic significance of Stanford golf course.	Refer to Master Response 8, Historical Significance of the Golf Course.
Dr.	Lyman Van Slyke	Refer to Letter 61.
	Removal of golf course hole #1 can be avoided with alternatives	
•	Draft EIR is inadequate because: Golf course supports California tiger salamander and California red-legged frog, wildlife habitat is significant, and the golf course provides an intermediary between the campus and open space.	
•	Draft EIR fails to show how the golf course would be reconfigured and what impacts would occur from the reconfiguration	
Ma	rk Harrison	
•	Opposed to alteration of golf course.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Heritage oak trees could be removed or damaged with reconfiguration, this needs to be studied further.	Refer to Master Response 7, Biological Resource Impacts of Golf Course Redesign.
Wa	alter Stewart	
•	Other housing alternatives are viable. They include: surface parking lots (i.e. stock farm site), intensify core campus development, redevelop existing sites (i.e., Wilbur hall, Stern, Searsville, or Escondido village), develop arboretum area (because the eucalyptus trees are a fire hazard and are not worthy of historic designation and this area could support other uses).	Refer to Master Response 4, Alternative Housing Sites.

÷

.

	Speaker Comment	Response
•	Reevaluate use of off-campus lands. Off- campus housing is recommended as mitigation, but is not part of the GUP.	The Draft EIR evaluates development in unincorporated Santa Clara County. Off-campus housing is identified as a mitigation measure for growth-inducing impacts. Refer to Response to Comment 94-22.
Ro	bert Hoover	
•	Save the golf course for the young people who get to play the Stanford golf course during the annual golf camp.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Ric	chard Harris	Refer to Letters 13 and 84.
•	Stanford golf course is a shrine, and should be protected.	
•	Stanford should grow up, not out (infill development)	
•	Draft EIR inadequate because there are no details about the golf course reconfiguration/relocation.	
•	What will the new driving range look like?	
•	Will Heritage Oaks be affected?	
٠	Will CTS be protected?	
•	Will road widening affect golf course further?	
•	Inadequate analysis of golf course impacts throughout Draft EIR.	
La	rry Taylor	
•	Unfair to require open space protection.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Sta	an Christensen	
•	Open Space - County can keep Stanford from developing their open space, it has been done other places.	Refer to Master Response 9, Additional Open Space Protection.
•	Permanent AGB at JSB.	Refer to Master Response 9, Additional Open Space Protection.
•	Dish area, need parking, trails, restoration, access points, etc.	Recreational use of the Dish area is discussed in Section 4.2 of the Draft EIR, but this is not part of the proposed CP/GUP.
•	Reduced project alternatives-impacts are not the same.	Refer to Master Response 2, Reduced Project Alternative.
•	One-half housing and no academic development should be analyzed.	Refer to Master Response 2, Reduced Project Alternative.
•	Project is way too big, no justification.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Require structured parking.	Refer to Master Response 3, Intensified Development Alternative.

•

.

	Speaker Comment	Response
8	County has discretionary approval authority, and they should use it.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Ed	ward Holland	
\$	Stanford is doing a good job.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Stanford needs to be able to grow to respond to current problems (i.e., housing).	Refer to Master Response 1, Statement for or Against the Project or Project Components.
8	County and Palo Alto should take care of their own problems (i.e. traffic congestion outside of core campus).	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Go	ordon Newell	
9	Supports League of Women Voters.	Comment noted.
•	General Plan needs to address the needs of Stanford's people: faculty, staff, and especially its students.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Look at other open areas for development of housing, such as next to San Francisquito Creek near the Sand Hill Road development.	Refer to Master Response 4, Alternative Housing Sites.
Je	ffrey Segall	
•	Chapter 4.1 Land Use, page 4.1-18. Draft EIR concludes that no significant impacts regarding land use conflicts would occur. How can golf course serve as buffer if it's moved? There would be potential land use conflicts between the Lathrop district and adjacent uses.	Refer to Response to Comment 84-21.
•	How was the AGB defined? The AGB was proposed by Stanford.	The Draft EIR evaluates two alternatives to the AGB proposed by Stanford.
3	Looks like land use conflict could occur between Lathrop and Special Conservation.	The Draft EIR recognizes that development of the Lathrop District has the "potential to conflict with natural resources protection and open space uses that are afforded in the surrounding area". However, there would not be a conflict with adjacent non-Stanford land uses.
•	Size of GUP and further development is unclear. Should provide statement of population density.	Refer to Master Response 10, Community Plan Description of Density and Intensity of Development.
Pa	ul Lomio, College Terrace	Refer to Letter 59.
•	Cut through traffic is a problem	
•	50% of traffic on certain streets is cut through traffic	
٠	College Terrace is 850 units	
•	Stanford proposes 1000 new units in area	
٠	Wants a comprehensive traffic study for College Terrace	

	Speaker Comment	Response
Ka	thy Durham	Refer to Letter 74.
•	School children have to cross Stanford Ave. to get to school	
٠	Need to monitor traffic on Stanford	
•	Traffic has increased with 1989 GUP Development, the last EIR said that it would not increase significantly	
•	Traffic volumes need to be monitored on Stanford Ave. to see who generates them	
•	The County needs to mitigate the traffic impacts from 1989 GUP development and further development	
•	Trip reduction for all campus residents, not just commuters. Implement traffic calming for College Terrace	
Ра	ul Hartke	Refer to Letter 43.
•	Graduate student housing needs to be provided	
Ly at	nn Orr, Dean of School of Earth Sciences Stanford	
٠	Define requirements for providing housing (i.e., "good faith effort").	Refer to Response to Comment 102-8.
•	Must consider restriction on housing sites when considering mandatory housing requirements (#s) before building academic uses.	Refer to Response to Comment 102-8.
Ne	il Struthers	
•	Supports Stanford plan.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Housing vs. open space.	Refer to Master Response 3, Intensified Development Alternative.
De	ennis Reinhardt	Refer to Letter 90.
•	There is conflict between needs for housing and open space protection	
•	The Arboretum ("Aussie weed patch") should be considered for development	
•	Take Stanford from a farm to a village	
Ma	ary Davey	Refer to Letters 1 and 60.
•	Adhere to Palo Alto USB along JSB – No development beyond this boundary	
•	With this AGB boundary – no development on golf course and no development at Carnegie Foundation	
٠	Build housing in core campus in village format	
•	Affordable housing is needed	

	Speaker Comment	Response
	Tie GUP to no net new commute trips	
8	Draft EIR refers to a housing linkage – housing should be completed before more academic development occurs, academic development should be reduced	
Ed	ie Keating	
•	Make Stanford be creative, provide them some constraints (i.e., no new net commuter trips, reduced proposed parking, reduced project size, require parking structures, enforce Palo Alto USB).	Refer to Master Response 3, Intensified Development Alternative, Master Response 2, Reduced Project Alternative, and Master Response 5, Project Conformity with Palo Alto Urban Service Area Boundary.
•	Preserve Lake Lagunita and golf course.	Refer to Master Response 1, Statement for or Against the Project or Project Components. Lake Lagunita is designated as Campus Open Space. The Draft EIR evaluates an alternative that designates the golf course as Campus Open Space.
	Further define a reduced project (more detail).	Refer to Master Response 2, Reduced Project Alternative.
9	Need to look at long term preservation of the foothills as Supervisor Joe Simitian said earlier on in this process.	Refer to Master Response 9, Additional Open Space Protection.
Sta	anley Peters	
•	Stanford's impacts are outweighed by their benefit.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
	Significant impacts are modest, Stanford benefits area, growth proposals are moderate.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Certify the EIR.	Comment noted.
Ka	thleen Much	
•	Supports the CP and GUP and feels the EIR is adequate.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Housing is infill and responsibly designed.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	How can people ask for the housing to be moved and still ask for open space preservation?	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Lathrop is not pristine, it has been developed for over 100 years.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Ro	bert Augsburger	Refer to Letter 21.
•	Identify additional housing sites, condition academic space on housing	
	Stanford has virtually no control on housing and development. Could result in blocking critical academic development	
	Palo Alto and others have historically blocked housing development	

ãar.

41

	Speaker Comment	Response
•	Relocate housing sites. The Draft EIR did not look at sites along Page Mill Road that were suggested during scoping	
•	Alternatives inadequate-see rejected alternative #2	
Ch	ristopher Stromberg	Refer to Letter 123.
•	Graduate students need more housing	
•	Housing linkage is a problem	
٠	Make sure that they are possible	
٠	Where else can housing be built?	
•	Allow housing on ECR frontage. No impacts from this housing.	
Не	rb Borock	Refer to Letters 32, 58, 107 and 108.
•	Draft EIR mitigation for open space has to include adjacent Palo Alto areas	
•	Prezone "alienable" land to open space	
•	Stanford should have to so that zone changes in Palo Alto are consistent with adjacent lands	
•	East of open space lands (Coyote Hill, lots 1, 2, and 3) also needs to be considered for protection	
•	Look at where golf course would go if moved. Look at other options. This needs to be studied	
•	Prohibit realignment of Campus Drive West, because it would open up foothill development	
•		
То	m Wyman	
•	2,000,000 sq. feet of new academic space will drain natural resources.	The Draft EIR has evaluated impacts on natural resources, including power and water.
•	Specifically water (Hetch Hetchy). Stanford's allocation of Hetch Hetchy water is nearly exhausted.	The Draft EIR evaluates impacts on water supply and finds that Stanford's allocation could be exceeded. However, water conservation and recycling could reduce water demand to less than the current allocation (see mitigation measure PS-1C on page 4.10-14).
•	Should not be able to exceed water supply.	If Stanford exceeds their current allocation they would have to apply for an increase from the San Francisco Water Department.
Ni	ck Spaeth	
•	Supports CP and GUP.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Need balanced perspective.	Refer to Master Response 1, Statement for or Against the Project or Project Components.

	Speaker Comment	Response
8	Stanford supplies housing for employees, provides transportation and incentives to reduce vehicle use, and provides golf course.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
8	Should not be punished because Stanford is the only one left who has open space.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Treat Stanford as other applicants are treated.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Ma	tt Lacey	
•	Golf course provides a recreational need.	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
•	Its location is positive for students.	Refer to Master Response 6, Recreational and Open Space Impacts of Golf Course Redesign.
•	Protect the golf course.	Refer to Master Response 1, Statement for or Against the Project or Project Components.
Ga	il Sredanovic	Refer to Letter 99.
*	Alameda DeLas Pulgas not included in the traffic study and should be	
ġ	Stanford has had other chances to provide housing and has not. Now Stanford is using students as pawns to pressure for more development in the GUP	
•	Need more detailed zoning-consistent with adjacent communities	
٠	Senior housing constructed in the past is not affordable	
Jea	annie Siegman	Refer to Letters 54 and 65.
•	Draft EIR traffic section states that if TDM doesn't work, we have to build intersection enlargements, etc. These mitigation measures would effect bikes, pedestrians, etc.	
*	Be more creative if Tier 2 traffic mitigation measures are needed, build in more flexibility. Don't be so specific	
Hu	nter Tart	
•	Housing may have some physical impacts, but it will have some benefits (commute trips, etc.).	The EIR has evaluated environmental impacts and benefits of housing.
0	Best, it will reduce hardships of students (people impacts).	Refer to Master Response 1, Statement for or Against the Project or Project Components.
•	Accept all 6 graduate student sites. Can't eliminate proposed sites without proposing some acceptable replacement sites.	Refer to Master Response 1, Statement for or Against the Project or Project Components and Master Response 4, Alternative Housing Sites.

•

13 CHANGES TO THE TEXT OF THE DRAFT EIR

CHAPTER 2

Page 2-14. Footnote 2 of Table 2-2 is modified to read:

2 Additional gross square feet (GSF) are estimated. <u>Additional gross square footage of student housing can be estimated by</u> <u>assuming 550 square feet per unit of student housing and 1,000 square feet per unit of resident/postdoctoral housing. This</u> would result in an additional 1,450,000 GSF of housing within the Academic Campus area, or a total of 3,485,000 additional GSF (excluding faculty/staff housing).

CHAPTER 4

Page 4.2-8. The fourth sentence in the first paragraph is revised to read:

The Stanford Equestrian Center at the Red Barn is a <u>2</u>5-acre on-campus site proposed for Campus Open Space designation.

Page 4.2-16. The last sentence of the second complete paragraph will be revised as follows:

The following areas would be changed from Academic Reserve and Open Space to Academic Campus (Figure 4.2-4). <u>The acreage of these areas is provided in Table 4.2-3 for the CP/GUP and Alternative land use components.</u>

Table 4.2-3

Academic Reserve and Open Space Lands Proposed for Academic or Residential Use¹

Site Location	Proposed CP Land Use	Approx. Acreage Converted	Alternative LU-A Land Use ²	Approx. Acreage Converted
Lathrop District ³	<u>E-SC</u>	<u>130</u>	<u>E-SC, E-SCO and</u> <u>E-SFR</u>	<u>20</u>
West Campus District	E-SC and E-SR-2	<u>105</u>	E-SCO and E-SR-2	<u>30</u>
Arboretum Corner	<u>E-SC</u>	<u>22</u>	<u>E-SC</u>	<u>22</u>
<u>El Camino</u> <u>Frontage</u>	<u>E-SC</u>	<u>18</u>	<u>E-SC</u>	<u>18</u>
Quarry District	<u>E-SC</u>	<u>6</u>	<u>E-SC</u>	<u>6</u>
Campus Center	<u>E-SC</u>	3	<u>E-SC</u>	<u>3</u>
Total		<u>284</u>		<u>99</u>

Source: Parsons, September 2000

<u>1</u> Refer to Figure 4.2-4 for a depiction of the Academic Reserve and Open Space lands proposed for academic or residential use in the CP/GUP.

2 Alternative LU-B would reduce conversion in the Lathrop District to 0 acres, and would include the same acres as the CP/GUP in all other areas, for a total conversion of 154 acres.

3 The Lathrop District acreage does not include the Special Conservation land use designation along San Francisquito Creek.

Page 4.2-22. The text is revised as follows:

Mitigation: OS-3: Improvement of Parks and Dedication of Trails

In addition to dedicating designating lands for use as parks, Stanford shall improve parks in the faculty area in such a way as to provide suitable recreational opportunities for the campus population and shall continue to provide neighborhood recreation opportunities in new residential areas. At a minimum, the park improvement shall provide facilities equal or greater to those lost from development of proposed GUP housing sites. To replace and expand recreational opportunities in the foothills, Stanford shall also dedicate the trail easements shown on the County Trails Master Plan. Stanford will work with the County Parks Department to clarify the process for developing the easement agreement, to identify the general location and type of uses that will be permitted for the trails being dedicated, and to discuss future construction and management considerations. The proposed location of the trail corridors will need to address conflicts with existing agricultural leases and sensitive riparian habitats along the adjacent creeks. Dedication of the trail corridors does not include a requirement

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

for Stanford to make any improvements to the trail corridors at this time, but such improvement may be agreed to by Stanford and the County Parks Department. Dedication could <u>shall</u> be phased as <u>academic and residential</u> development under the GUP proceeds.

Page 4.3-8. Table 4.3-7 is revised as follows:

Table 4.3-7

Jurisdiction	1990 Housing Units	1999 Housing Units	
Stanford	956 faculty/staff units	989 faculty/staff units	
	8,658-<u>8,564</u> students housed	9,354 students housed	
City of Palo Alto	25,188	25,952	
City of Menlo Park	12,428	12,723	
Santa Clara County	540,240	581,532	

Growth in the Housing Stock 1990 - 2000

Sources: U. S. Census Bureau; California Department of Finance; Stanford University

*Data for Stanford is from 1999 Annual Report #11 for the period September 1998 through August 1999.

(Note: Stanford housing unit data are based on academic years. 1990 Census housing unit data for Palo Alto, Menlo Park, and Santa Clara County are as of April 1990. 1999 housing unit data for Palo Alto, Menlo Park, and Santa Clara County are from California Department of Finance estimates as of January 1, 1999.)

Page 4.4-97. The last sentence in the second paragraph is revised to read:

Only programs that would lead to trip reduction in the area bounded by US 101, Willow Road/Sand Hill Road, Interstate 280, and Page Mill Road, and the Stanford Research Park may be considered for this credit.

Page 4.4-98. The second sentence in the first full paragraph is revised to read:

The jurisdiction may choose to use funds that Stanford contributes for the intersection modifications, Θr for trip reduction measures that benefit the intersection in question, or for equally or more effective alternate mitigation measures that may be available at the time that the mitigations are triggered.

Page 4.4-103. The text is revised as follows:

Junipero Serra Boulevard and Page Mill Road (Congestion Management Plan in Palo Alto). Mitigation at this intersection would require adding a second southbound right turn lane. This mitigation is considered technically feasible. This improvement is

within the jurisdiction of the City of Palo Alto, and Santa Clara County, which has no authority to require improvements the implementation of mitigation measures at this location. This improvement should be considered a Tier 2 improvement.

Page 4.4-109. The text of mitigation measure TR-7D shall be modified as follows:

<u>When feasible</u>, the project sponsor shall be required to prohibit or limit the number of construction employees from arriving or departing the site between the hours of 4:30 PM and 6:00 PM.

Page 4.5-1. Starting on this page Sections 4.5.A.1, 4.5A.2, and Table 4.5.1 are revised to read:

4.5.A.1 General

Within Santa Clara County, the 4,017-acre Stanford Community Plan area (project area) is located primarily within the San Francisquito Creek and Matadero Creek watersheds. San Francisquito Creek and Matadero Creeks discharge into the southern portion of San Francisco Bay. A small portion of the project area is also located within the Arastradero Creek watershed. The approximate watershed boundaries within the project area are shown in Figure 4.5.1.

- Approximately 1,800 acres of the project area are located within the San Francisquito Creek watershed. Major surface waters in this area include San Francisquito Creek and Los Trancos Creek, Felt Lake (irrigation supply for the campus) and Lake Lagunita (seasonal recreational lake for the campus). San Francisquito Creek and Los Trancos Creek flow in a northerly or northeasterly direction. San Francisquito Creek forms the boundary between Santa Clara and San Mateo Counties.
- Approximately 2,200 acres of the project area are located within the Matadero Creek watershed. The major surface water in this area is Matadero Creek, which flows in a northeasterly direction. A small portion of the watershed drains in an easterly direction towards Deer Creek, which flows in a northerly direction to Matadero Creek. <u>Another small portion of the watershed drains in a southerly direction towards Arastradero Creek, which flows in a southerly direction towards Arastradero Creek, which flows in a southerly direction towards Arastradero Creek, which flows in a southerly direction to Matadero Creek. After leaving the project area, Matadero Creek flows through Palo Alto and is channelized toward the Bay.</u>
- Approximately 100 acres of the project area are located in the Arastradero Creek watershed. Arastradero Creek flows in a southerly direction.

4.5.A.2 Surface Water Hydrology

Matadero Creek Watershed

Subareas M-1 through M-7 drain to Matadero Creek, and Subarea D-1 drains to Deer Creek, which flows into Matadero Creek, and Subarea A-1 drains into Arastradero Creek, which also flows into Matadero Creek.

- Subarea M-1 is traversed by Matadero Creek. Storm runoff from Subarea M-1 enters Matadero Creek upstream of Junipero Serra Boulevard.
- Storm runoff from Subarea M-2 enters an existing drainage conduit located in Page Mill Road and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-3 enters an existing drainage conduit located near the intersection of Stanford Avenue and Dartmouth Street and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-4 enters an existing drainage conduit located in El Camino Real near Stanford Avenue and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-5 enters an existing drainage conduit in El Camino Real near Sierra Street and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-6 enters an existing drainage conduit at El Camino Real near the Stadium and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea M-7 enters an existing drainage conduit at El Camino Real near Galvez Street and is ultimately conveyed to Matadero Creek.
- Storm runoff from Subarea D-1 enters Deer Creek upstream of its confluence with Matadero Creek.
- <u>Storm runoff from Subarea A-1 flows in a southerly direction away from the project</u> area and enters Matadero Creek near the intersection of Arastradero and Page Mill <u>Roads.</u>

Arastradero Creek Watershed

• Storm runoff from Area A-1 flows in a southerly direction away from the project area.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

Table 4.5-1

Watershed Characteristics

				Area in Proposed CP Land Use Designations (acres)					
Watershed Subarea	Total Area ¹ (acres)	Existing Developed Area (acres)	Existing Undeveloped Area (acres)	Academic Campus or Public School	Campus Residential	Campus Open Space	Open Space & Academic Reserve or Special Conservation	Total Developable Area ² (acres)	
San Francisquito Creek									
S-1	380	40	340	30	40	40	270	70	
S-2	520	50	470	360	40	30	90	400	
S-3	30	30	0	30	0	0	0	30	
L-1	220(300)	0	220	0	0	0	220	0	
L-2	650	0	650	0	0	0	650	0	
Matadero Creek									
M-1	540(980)	0	540	0	0	0	540	0	
M-2	50	50	0	0	50	0	0	50	
M-3	440	295	145	20	290	20	110	310	
M-4	110	100	10	100	10	0	0	110	
M-5	390	330	60	360	30	0	0	390	
M-6	140	40	100	120	0	20	0	120	
M-7	270	55	215	100	0	170	0	100	
D-1	160	0	160	0	0	0	160	0	
Arastradero Creek									
A-1	100	0	100	0	0	0	100	0	

1. Includes those portions of the watershed subarea within the project area. Where the watershed includes lands outside the project area, the larger total is shown in parenthesis.

2. Developable area includes areas designated as Academic Campus or Campus Residential

Page 4.5-9 The second sentence in the first paragraph is revised to read:

Based on the *Drainage Manual* for the County of Santa Clara, the 100-year precipitation used for estimating storm runoff was 4.32 inches (or $0.17 \ 0.18$ inches per hour over a 24-hour period). The peak storm runoff estimates are presented in Table 4.5-2. The hydrologic analysis was performed using the Technical Release 55 (TR-55) model developed by the United States Department of Agriculture Soil Conservation Service (SCS).

Pages 4.5-10 and 4.5-13. Tables 4.5-2 and 4.5-3 are revised as follows:

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

Table 4.5-2

		Estimated Existing Pre-GUP Condition			Es	<u>timated</u> Pro	posed Post	-GUP Conditi	on	
Subarea	Total Area (acres)	Existing Imper- vious Area (acres)	SCS Runoff Curve No. (CN)	<u>Total</u> <u>Time of</u> <u>Concen-</u> <u>tration</u> (hours)	Peak 100- Year, 24- Hour Runoff. Q _{pre} (cfs)	Additional Imper- vious Area (acres)	SCS Runoff Curve No. (CN)	<u>Total</u> <u>Time of</u> <u>Concen-</u> <u>tration</u> (hours)	Peak 100- Year, 24- Hour Runoff, Q _{post} (cfs)	Detention Basin Capacity Requireme nt (cubic feet) ¹
S-1	380	10	77	<u>0.26</u>	174	1	78	<u>0.26</u>	185	8,300
S-2	520	51	64	<u>0.19</u>	72	19	65	<u>0.19</u>	79	8,000
Subtotal, San Francisquito Creek Watershed	900	61			246	20			264	16,300
M-3	440	117	85	<u>0.17</u>	246	1	85	<u>0.17</u>	246	None ²
M-4	110	30	86	<u>0.19</u>	56	5	87	<u>0.19</u>	58	1,600
M-5	390	209	87	<u>0.41</u>	225	7	87	<u>0.41</u>	225	None ²
M-6	140	34	70	<u>0.27</u>	26	1	70	<u>0.27</u>	26	None ²
M-7	270	47	67 <u>64</u>	<u>0.51</u>	39	5	68 <u>65</u>	<u>0.51</u>	43	4,400 <u>4,800</u>
Subtotal, Matadero Creek Watershed	1,350	437			592	19			598	<u>6,400</u> 6,000
Totals:	2,250	498			838	39			862	<u>22,700</u> 22,300

Estimated 100-Year 24-Hour Storm Runoff and Detention Basin Requirements

1. Estimated detention basin storage capacity required to prevent Qpost from exceeding Qpre.

2. Although some additional impervious area will be constructed in this subarea, the increase in impervious area is not sufficient enough to cause an increase in the SCS Runoff Curve number and thus an increase in the peak storm runoff discharge.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

Table 4.5-3

Storm Water Runoff Quality in Project Area Vicinity (1993 through 1999)

Sampling Point		Samples	Specific	pH (units)	Total	Copper	Lead (mg/l)	Oil and
No.	Description	Collected	Conductance (umhos/cm)		Suspende d Solids (mg/l)	(mg/l)		Grease (mg/l)
1	Stanford Ave at Dartmouth St	10	51 to 1,100	6.9 to 8.8	4 to 230	ND to 0.055	ND to 0.022	ND
2	Stanford Ave at El Camino Real	10	34 to 110	6.5 to 8.6	9 to 210	ND to 0.047	ND to 0.025	ND to 11
3	Sierra St at El Camino Real	10	46 to 110	7 to 9.1	11 to 200	0.014 to 0.07	ND to 0.062	ND to 18
4	Football Stadium at El Camino Real	10	81 to 910	6.8 to 8.9	34 to 230	ND to 0.064	ND to 0.04	ND to 14
5	Galvez St at El Camino Real	9	51 to 180	6.6 to 8.8	15 to 180	0.015 to 0.035	ND to 0.015	ND
<u>6</u>	<u>90-inch Storm Drain at San</u> <u>Francisquito Creek (200 feet</u> <u>upstream of El Camino Real)</u>	<u>10</u>	<u>44 to 850</u>	<u>7.1 to 8.9</u>	<u>ND to 54</u>	<u>ND to 0.23</u>	<u>ND to 0.029</u>	<u>ND to 5.5</u>
<u>7</u>	<u>42-inch Storm Drain at San</u> <u>Francisquito Creek (600 feet</u> <u>upstream of El Camino Real)</u>	<u>10</u>	<u>27 to 170</u>	<u>6.6 to 8.6</u>	<u>3 to 82</u>	<u>ND to 0.16</u>	<u>ND to 0.027</u>	<u>ND to 17</u>
	Source: Stanford University							

ND = Not detected

Page 4.5-16. Mitigation Measure HWQ-1: Manage Stormwater Runoff is revised to read:

Mitigation: HWQ-1: Manage Stormwater Runoff

In order to prevent site development from <u>contributing to</u> causing increased downstream flooding-<u>due to an</u> increase in <u>peak 100 year storm runoff</u>, <u>Stanford</u> <u>shall accomplish the following:</u>

- <u>Construct and operate</u>, the project would require construction and operation of storm drainage detention facilities within the project area; <u>It is estimated that</u> approximately-22,000 cubic feet (0.5 acre feet) of detention basin capacity would be required.
- Consider site design features that would decrease post-development runoff, including features presented in the Bay Area Stormwater Management Agencies' "Start at the Source – Design Manual for Stormwater Quality Protection and Site Planning for Urban Stream Protection"; and
- Consider the use of diversion of parking lot and building runoff to vegetated swales, pervious pavement, reduced building foot prints, infiltration of storm runoff, and other similar measures to reduce peak runoff rates and increased runoff volumes.

The detention facilities and other site features and measures designed, constructed, and implemented by Stanford shall be sufficient to assure that there is no increase in peak downstream storm runoff following development and that the increased post-development runoff volume does not cause downstream flooding. Santa Clara County shall specify the criteria (including the storm event or events and models) that shall be used by Stanford to design detention facilities, site features, or other measures used to prevent impacts caused by increases in postdevelopment storm runoff. The facilities shall be designed to only temporarily store the storm water runoff and not create extended ponding that could result in mosquito breeding. In establishing the appropriate design criteria (e.g., 100 year, 24 hour storm event), Santa Clara County shall consult with Santa Clara Valley Water District regarding the storm events that Stanford shall use in designing facilities that have sufficient capacity to prevent impacts on downstream storm drainage facilities.

Two alternative approaches are possible for implementation of this <u>mitigation</u> measure:

(a) Stanford shall prepare a site-specific hydrology and drainage study for each individual building project. Based on the results of this study, Stanford shall design, construct, and maintain project specific storm drainage system improvements, site features, or measures include detention facilities that are sufficient to assure that the peak 100-year storm runoff leaving the project area does not increase and that the increased runoff leaving the project area does not cause downstream flooding. Individual detention facilities, site features, or measures may serve more than one building project, but Stanford must

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

demonstrate adequate detention capacity to <u>prevent contain</u> increased runoff as part of the project application. The <u>All</u> detention facilities shall be designed to only store the storm water runoff temporarily and not create extended ponding that could result in mosquito breeding. Prior to storm water facility construction, Santa Clara County shall approve the proposed improvements.

(b) As an alternative to preparing site-specific studies for each project, Stanford can elect to prepare a hydrology and drainage study for all or a specified portion of a particular watershed area. Based on the results of this study, Stanford shall design, construct, and maintain storm drainage improvements that include on-site detention facilities, site features, or measures sufficient to assure that the peak 100year storm runoff leaving Stanford lands covered by the study does not increase as a result of new development, and that the increased runoff does not cause downstream flooding. After approval of such stormwater facility construction by Santa Clara County, no further site-specific hydrology and drainage studies would be required for new development the sites covered by the study, provided that the stormwater facility is in place prior to issuance of new building permits in the subarea addressed by the study.

Page 4.5-18. Mitigation Measure HWQ-2: Maintain Groundwater Recharge is revised to read:

Mitigation: HWQ-2: Maintain Groundwater Recharge

(a) Stanford shall prepare a site-specific groundwater recharge study for each project that is proposed to occur within the unconfined zone.

(b) Alternatively, Stanford could prepare a recharge study for development proposed to occur in all or a portion of the unconfined zone. The study or studies may be conducted in conjunction with hydrology and drainage studies as appropriate. The study shall identify the extent that new development will occur in the unconfined zone and the estimated average annual groundwater recharge that occurs in that area under pre-development conditions. Based on the results of this study, Stanford shall design, construct, and maintain facilities (e.g. shallow infiltration basins) that offset "lost" groundwater recharge by increasing recharge in other portions of the unconfined zone. The recharge facilities shall be designed to only temporarily store the storm water runoff and not create extended ponding that could result in mosquito breeding. Prior to construction, Santa Clara County shall approve the "replacement" groundwater recharge facilities. Storm drainage facilities that detain runoff within the project area may also serve as groundwater recharge facilities.

(c) So as to not pollute the groundwater resource, Best Management Practices and site design features shall be used to maintain the quality of storm runoff diverted by Stanford to groundwater recharge facilities shall be equal or better in quality to the runoff that would have recharged naturally at the developed site.

Stanford's Hetch Hetchy allocation may be reduced, Stanford shall develop and implement a plan for responding to such a supply shortage. The plan shall include identification of conservation methods, and an evaluation of other potential sources of supply sources, including any treated water supply that may be soon available to Stanford through Santa Clara Valley Water District.

Page 4.5-19. Mitigation Measure HWQ-3: Protect Water Quality is revised to read:

Mitigation: HWQ-3: Protect Water Quality

(a) Stanford shall submit a Notice of Intent (NOI) to the State Water Resources Control Board for the construction activities allowed by the GUP to be covered under NPDES General Permit CAS000002. <u>As an alternative, Stanford may also submit additional NOIs for specific major projects.</u> Stanford <u>shall will</u> be required to comply with the terms of the NPDES permit for each construction site at all construction sites (even sites where less than 5 acres are disturbed). that includes more than 5 acres. This includes preparation of Storm Water Pollution Prevention Plans (SWPPP) <u>covering all projects involving land disturbance that will be constructed pursuant to the General Use Permit for the construction site</u>. The SWPPPs shall identify effective Best Management Practices (BMPs) for preventing groundwater pollution caused by any construction activities. <u>The</u> <u>SWPPPs It shall also identify BMPs that have been demonstrated to be effective in</u> preventing storm water pollution caused by runoff occurring during construction.

(b) Prior to any new construction, Stanford shall perform a survey where development is proposed to occur to determine the location of wells that have not been properly abandoned within the proposed site. If any such wells are located on the site proposed for development, Stanford shall perform an investigation to verify that the well was properly abandoned. If Stanford cannot confirm that the well was properly abandoned, Stanford shall take steps to locate and abandon the well in accordance with State and local standards. <u>Stanford shall request assistance and information from the Santa Clara Valley Water District to locate existing inactive wells on sites to be developed and to confirm procedures for properly destroying inactive wells.</u>

(c) Prior to any construction, demolition, grading, or landscaping within 50 feet from the top of a bank of a Santa Clara Valley Water District watercourse, Stanford shall obtain a permit from the District.

(d) During construction, Stanford shall monitor the effectiveness of storm water pollution prevention best management practices at all construction sites during and after storm events.

(e) As a General Use Permit condition, Santa Clara County shall require that, <u>W-within</u> the boundaries of the unconfined zone, Stanford shall not engage in new land uses or practices (e.g. storage of chemicals in single wall tanks, application of pesticides that could be transported down to the groundwater supply) that could STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

pose a threat to the groundwater supply. If <u>Stanford leases portions of its</u> property in the unconfined zone is leased and maintained by others, <u>Stanford shall notify and</u> require that the leaseholders comply with the restriction education regarding <u>land</u> use practices that could threaten the groundwater supply pesticide use shall be provided to leaseholders. <u>Santa Clara County will enforce Stanford's compliance</u> with this restriction.

Page 4.5-21, Mitigation Measure HWQ-4 Best Management Practices for Preventing Post-Construction Urban Runoff Pollution is revised to read as follows:

Mitigation: HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution

(a) Stanford shall implement site improvements for new buildings and parking lots shall that include BMPs that are effective for preventing post-construction storm water and groundwater pollution caused by urban runoff, including grassy swales and vegetated filter strips. Parking lot runoff BMPs considered shall include grassy swales or vegetated filter strips.

(b) Prior to construction, Santa Clara County Land Development Engineering shall review and approve the proposed post-construction BMPs to assure conformance with the Santa Clara County Urban Runoff Management Plan (URMP).

Pages 4.6-1 through 4.6-2. The text starting with the section on Active Faults is revised to read:

Active Faults

The San Francisco Bay Area is a seismically active region dominated by movement along active, predominantly right lateral, strike-slip, northwest-trending faults of the San Andreas system. Three major active branches of this fault system, the San Andreas fault, the Hayward fault, and the Calaveras fault are located close enough to the Stanford campus to produce strong seismic ground motions in the project area. Figure 4.6-1 shows the location of the project area relative to the major faults. Table 4.6-1 summarizes data on active faults in the area. Throughout the following discussion, earthquake magnitudes reference the Moment Magnitude Scale, which has been found in recent years to best describe large earthquakes (M \geq 6.5). Richter Magnitude measures the amount of shaking generated by the earthquake, while Moment Magnitude measures the extent of rupture produced by a seismic event.

San Andreas Fault

In the past, the San Francisco Peninsula segment of the fault ruptured with large magnitude earthquakes in 1838 (estimated Richter magnitude 7) and in 1906 (magnitude $7.9 \, 8.25$). In 1989, the magnitude 6.95 Loma Prieta earthquake was centered on a closely related subordinate fault and caused severe damage and loss of life in Oakland and San Francisco more than 60 miles from the epicenter. The 1906 and 1989 earthquakes also

caused extensive property damage on the Stanford campus. Damage to some buildings on campus from the 1989 earthquake has yet to be repaired.

Despite the occurrence of the Loma Prieta earthquake, the probability of another magnitude 7 event occurring on the San Andreas fault in the San Francisco Bay Area in the next 30 years is estimated to be 21 percent (Working Group on California Earthquake Probabilities 1999). The maximum credible earthquake magnitude is considered to be 7.1 for the Peninsula segment of the San Andreas (CDMG 1996) and 7.9 for the 1906 rupture segment . Slip rates for these two segments of the San Andreas fault are assessed as 17+3mm/year and 24+3mm/year, respectively. magnitude 8.3 to 8.5.

Hayward Fault

The Hayward fault is approximately 65 miles long and extends from San Pablo Bay to southeastern San Jose where it probably converges with the Calaveras fault. The total ongoing seismic fault strain accumulation which is periodically released in earthquakes has been evaluated to be 9.0 mm per year (Working Group on California Earthquake Probabilities 1999). Magnitude 7 earthquakes occurred on the Hayward fault in 1836 and 1868. Little is known about the first of these events except that it ruptured the northern part of the fault in the vicinity of Berkeley and Oakland. The October 21, 1868 earthquake had 3 feet of horizontal fault displacement and had a total rupture length of at least 20 miles. The 1868 earthquake was centered in Hayward and caused soil liquefaction and severe damage to communities situated along the fault as well as in San Jose and San Francisco. The probability of a magnitude 7 earthquake occurring again on the Hayward fault in the next 30 years has been assessed as 23 percent (Working Group on California Earthquake Probabilities 1999). The maximum eredible earthquake is considered to be about magnitude 7.<u>15</u>.

Calaveras Fault

The Calaveras fault extends about 100 miles from Concord to Hollister where it merges with the San Andreas fault zone. The Calaveras fault is considered to be capable of generating a magnitude <u>6.87.3</u> maximum credible earthquake (<u>CDMG 1996Slemmons and Chung 1982</u>) for the fault segment north of Calaveras Reservoir. In recent decades moderate earthquakes and rapid fault creep have been associated with the segment south of San Jose. The April 24 1984, magnitude 6.2 Halls Valley earthquake and the August 10, 1979, magnitude 5.9 Coyote Lake earthquake originated on the Calaveras fault. The Calaveras fault is also considered to be the source of the July 3, 1861 earthquake of estimated magnitude 6, which caused ground rupture in the San Ramon and Amador valleys.

San Gregorio Fault

The San Gregorio fault lies about 10 miles to the southwest of the San Andreas fault and is capable of an earthquake of <u>maximum</u> magnitude 7.3, but with a longer recurrence interval than the other major faults in the Bay Area (Table 4.6-1). This fault generated

OCTOBER 2000

several moderate earthquakes in the Monterey Bay area in 1926, but the northern portion in San Mateo County has caused only microearthquakes in historic time.

Page 4.6-5. Section 4.6.A.2 and Table 4.6-1 are revised to read:

4.6.A.2 Seismicity

The intensity of on-site shaking is a function of the potential magnitude of an earthquake and the distance of the project area from the event. In the event of a large earthquake on either the San Andreas, Calaveras, or Hayward fault, the project area could experience "very strong" seismic shaking (ABAG 1999 and Borcherdt, Gibbs, and Lajoie 1975). This rating corresponds generally to maximum levels of VIII to IX on the Modified Mercalli (MM) Scale, which relates to human perception and amount of damage. Table 4.6-2 describes the Modified Mercalli Scale. Because of Stanford's proximity to the San Andreas fault, an event on this fault could result in the highest intensity of on-site shaking.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

Table 4.6-1

Fault	Distance ¹ (miles)	<u>Maximum</u> <u>Magnitude³ (Moment <u>Magnitude</u> <u>Scale</u>) Probable Large Earthquake Magnitude (Richter Scale)</u>	<u>Fault Slip</u> <u>Rate³ (mm/yr)</u>	Estimated Recurrence Interval ³ (years)	<u>Seismic</u> Source Type⁴	
San Andreas	2 to 5	<u>7.2</u> > 7	<u>17+4</u>	<u>220</u> 170	A	
Hayward	12	<u>7.1</u> 7.0	<u>9+2</u>	<u>236</u> 200	A	
Calaveras	17	<u>7.0</u> 6.3	<u>6+2</u>	<u>324</u> 100	A	
Monte Vista	<1	<u>6.8</u> 6.5+	<u>0.4+0.3</u>	<u>2410</u> 1000?	B	
Blind (Concealed) Thrust Fault Beneath Stock Farm Monocline	5 ²	5.5	<u>0.1 to 0.5</u>	200	<u>C</u>	
San Gregorio	14	<u>7.3</u> 7.5	<u>5+2</u>	<u>438</u> 800	A	
Greenville	30	<u>6.9</u> 6.8	<u>2+1</u>	<u>1057</u> 3500	B	
Rogers Creek	50	<u>7.1</u> 6.9	<u>9 2</u>	<u>236</u> 250	A	
Sources of Information: Dames & Moore (1995), Woodward- Clyde Consultants (1995a) Koyach and Page (1995) Jim Baker, Santa						

Active Faults in the Project Area

Sources of information: Dames & Moore (1995), Woodward-Clyde Consultants (1995a), Kovach and Page (1995), Jim Baker, Santa Clara County Geologist (personal communication 2000)

1. Distance from fault to nearest portion of project area; for the San Andreas fault the distances shown are to the nearest and farthest corners of the Stanford Community Plan boundary.

2 Distance of Blind Thrust is vertical (depth beneath the sit e)

3. Information mostly from WGCEP (1999) except Monte Vista and Blind Thrust Fault. Recurrence time is for any large earthquake M> 6.7

4. Seismic Source Type for use in seismic design according to UBC 1997/CBC 1998

The project area experienced widespread MM intensity VII and localized MM VIII shaking during the Loma Prieta earthquake in 1989 and probable MM intensity VIII in 1906. MM VIII is the intensity at which major structural damage begins to take place. However, major financial losses due to damage of building contents can occur at Intensity VII. In 1989, extensive and very costly damage occurred on the Stanford Campus due to an earthquake of less severity than the

anticipated maximum earthquake for the San Andreas fault. A recent publication developed new equations relating site ground motion parameters of Peak Ground Acceleration (PGA) and Peak Velocity (PGV) with MMI (Wald and others 1999). According to this work, MMI IX correlates with site PGA in the range of 0.65g to 1.24g and PGV in the range of 60 to 116 centimeters per second.

While not intended as seismic ground motion criteria for engineering design, Table 4.6-1 provides estimates of maximum probable magnitudes for earthquakes originating on the capable faults in the project area and fault classifications suitable for determining seismic ground motion criteria for project engineering design. Seismic parameters for the Design Basis Earthquake (DBE = 10% probability of exceedance in 50 years) for the Stanford vicinity will be calculated using procedures of UBC 1997/CBC 1998.

Page 4.6-9. The text is revised to read:

Seismic Hazards Co Seismic Deformation

Seismic hazards include ground shaking, surface rupture and related ground deformation along active faults, liquefaction, and shaking induced differential settlement. Strong ground shaking can damage structures, their foundations, and contents as well as cause injury to occupants. Strong ground shaking may also trigger secondary effects such as liquefaction or ground settlement in some areas. Ground shaking intensity of VIII on the Modified Mercalli Scale (Table 4.6-2) could damage well built structures.

Damage due to surface rupture and related ground deformation (e.g. cracking, bending, and buckling) is limited to the actual surface location of the fault rupture, unlike damage from ground shaking that can occur at significant distances from the source fault. Surface rupture can damage buried pipelines that have not been especially protected where they cross fault traces.

A zone of special consideration for possible coseismic ground deformation has been established along the lower hinge of the Stock Farm Monocline where it crosses the Stanford Campus. The cause of the deformation would be coseismic slip on a blind thrust fault at depth below the Stock Farm Monocline. Several centimeters of deformation along the trace of the lower hinge were predicted in a study by Dames and Moore (1995a). The effects, which could damage building foundations, would be several centimeters of uplift, tilting and crumpling (shortening) of the ground surface.

Liquefaction

A hazard related to severe ground shaking...

Pages 4.6-13 and 4.6-14. Table 4.6.3 is revised to include the following references as justification:

Table 4.6-3

Evaluation Criteria with Points of Significance – Geology and Seismicity

Evaluation Criteria	As Measured By	Point of Significance	Justification
1. Will project facilities be damaged by ground surface rupture and related fault deformation?	Hazards associated with location of facilities within an Alquist-Priolo Earthquake Fault Zone or other designated surface rupture zone	Greater than 0 structures without appropriate seismic design features located within an earthquake fault zone	Santa Clara County Geologic Hazard Zone Maps Alquist-Priolo Earthquake Fault Zones Act. CDMG mapping of other fault zones Santa Clara County Environmental Evaluation Checklist Item F(a)(i)
2. Will earthquake-induced strong ground shaking damage Project facilities?	Structural design and construction not in conformance with requirements of seismic design standards	Greater than 0 structures not in compliance with the provisions of the Uniform Building Code Greater than 0 structures of unique design not covered by the ordinary provisions of the Uniform Building Code	Santa Clara County Building Permit Dept. plan review Santa Clara County URM Ordinance Uniform Building Code (1997) with California amendments (1998) Santa Clara County Environmental Evaluation Checklist Item F(a)(ii) <u>California Division of Mines and Geology (CDMG) Guidelines (1997)</u> <u>Chapter 4</u>
3. Will project facilities be damaged by co-seismic ground deformation?	Hazards associated with location of facilities within Stock Farm Monocline zone	Greater than 0 structures without appropriate seismic design features located within designated zone of potential co- seismic deformation	Santa Clara County Geologic Hazard Zone Maps Dames and Moore (1995) map Stock Farm Monocline Agreement (Zone map maintained by Santa Clara County Planning Department) Santa Clara County Environmental Evaluation Checklist Items F(a)(iii)

. 7. 1

Table 4.6-3

Evaluation Criteria with Points of Significance – Geology and Seismicity

Evaluation Criteria	As Measured By	Point of Significance	Justification
4. Will project facilities be damaged by liquefaction or settlement during an earthquake?	Hazards associated with CDMG rating of potential for liquefaction, or more detailed geo- technical assessment of liquefaction potential (CDMG Guidelines 1997)	Greater than 0 structures without appropriate seismic design features located within an area high risk for liquefaction or settlement	Santa Clara County Geologic Hazard Zone Maps (1978) Santa Clara County Environmental Evaluation Checklist Items F(a)(iii) State Seismic Hazard Map Program Maps (pending) <u>CDMG Guidelines (1997) Chapter 6</u>
5. Will project facilities be damaged by unstable slope conditions?	Hazards associated with location in an area of moderate to high landslide risk, defined by Santa Clara County, including roads with slopes greater than 20% and buildings on slopes greater than 30 percent	Greater than 0 structures located within an area of moderate to high landslide risk without appropriate slope stabilization	Santa Clara County Geologic Hazard Zone Maps Santa Clara County Environmental Evaluation Checklist Items F(a)(iv) and (c) and G(k) and (l) State Seismic Hazard Map Program Maps (pending) <u>CDMG Guidelines (1997) Chapter 5</u>
6. Will project facilities be exposed to damage due to expansive soils or soils with moderate to high erosion potential?	Shrink-swell potential and erosion potential as rated in Santa Clara County Soil Survey (Soil Conservation Service)	Greater than 0 structures not covered by the Uniform Building Code located on soils with a rating of moderate to high for shrink-swell or high for erosion potential	Site-Specific Geotechnical studies USDA Soil Conservation Service (SCS) Report Santa Clara County Environmental Evaluation Checklist Items F(b) and (d)

Pages 4.6-15 and 4.6-16. Section 4.6.C, Impacts and Mitigation Measures, Impacts G&S-2 and G&S-4, are revised to read:

IMPACT: G&S-2: Will earthquake-induced strong ground shaking damage project facilities?

Analysis: Less than Significant

Large earthquakes caused extensive property damage at the project site in 1906 and in 1989. There is a high probability that another major earthquake event will occur within the next 30 years. However, planning, design, and construction of all new structures and support facilities are carried out <u>on a project-specific basis</u> according to California and Santa Clara County standards. These include the Santa Clara County Unreinforced Masonry Ordinance and the 1997 UBC with 1998 California amendments with stringent peer review for major structures. The main objectives of seismic design measures are to prevent building collapse, limit property damage, and minimize risk to human life and health. Assuming that these objectives are met, seismic shaking hazards would be less than significant. The residual damage level would be acceptable within California standards. <u>Compliance with existing County procedures and regulatory requirements make the impact less than significant.</u>

IMPACT: G&S-4: Will project facilities be damaged by liquefaction or settlement during an earthquake?

Analysis: Less than Significant

Portions of the project site, particularly the northern third of the project site, are designated as having moderate to high potential for liquefaction due to shallow groundwater and/or low-density, compressible soils. Areas immediately adjacent to creeks <u>and lakes may also be susceptible to liquefaction-caused lateral spreading</u> resulting in inward movement on properties <u>adjacent to water bodies along creek</u> banks. Project-specific, localized screening investigations to assess liquefaction potential will be performed, as needed, followed by more-detailed investigation, testing, and geotechnical analyses following State guidelines (CDMG 1997, Chapter 6).

Engineering designs required by the County Geologist and/or the County Building Inspection Office will include foundation design measures, for example, distributed loadings, deep supports, earthwork, or dewatering to prevent or compensate for deformations that could occur due to liquefaction or earthquake-induced settlement. With incorporation of these standard measures the impact would be reduced to an acceptable level of risk and is thus less than significant.

Page 4.8-27. The discussion of impacts to steelhead and California red-legged frog is revised:

No Impact; Steelhead and California Red-legged frog

The proposed Community Plan and General Use Permit application do not propose any new development or other activities within or adjacent to any of the creeks in the project area. <u>However, as part of the Hole #1 housing, the first seven holes of the golf course would be redesigned.</u> Two existing golf cart bridges crossing San Francisquito Creek would retrofitted and one crossing would be removed. <u>Retrofitting and removal of creek crossings would be done during the dry season</u> to avoid impacts to migrating steelhead or California red-legged frogs that may occur in the creek. Removal of barriers to steelhead migration would be beneficial. <u>Stanford has indicated that the following measures will be included as part of their</u> project description for redesign of the golf course.

- <u>Stanford shall obtain a 1600 series Streambed Alteration Agreement from the</u> <u>California Department of Fish and Game prior to the retrofitting of bridges or</u> <u>removal of instream structures.</u>
- <u>Water quality BMPs shall be implemented to avoid runoff of sediments or</u> pollutants during retrofitting of the two golf cart bridges.
- Instream structures shall be removed during the dry season only, so as not to disturb salmonid migration or red-legged frog breeding during the rainy season.
- <u>Cranes shall be used to remove the instream concrete and steel, rather than</u> excavators, in order to minimize disturbance to the streambed. Blasting of underwater concrete should be avoided.

The project would result in the construction of new impervious surfaces, which would increase surface runoff from the project area. In addition, project construction activities and runoff from new developed areas have the potential to result in a degradation of surface water quality. However, the hydrology mitigation measures included in Section 4.5, Hydrology and Water Quality, would require surface water detention basins, water quality BMPs, and other drainage facilities stormwater management measures that would be designed to maintain surface runoff at existing levels and protect water quality. No impacts to steelhead or California red-legged frog would therefore occur.
Page 4.8-31. The discussion of mitigation measure BIO-1(a) through (e): Option 1: CTS Mitigation Program, is revised as follows:

- (b) In order to minimize the potential for loss of individual CTS during project construction, the following measures shall be required for construction of projects in the CTS Management Zone.
 - (1) A <u>pPre-construction</u> surveys for CTS shall be conducted at the beginning of <u>during</u> the rainy season prior to construction of any project that would affect potential CTS habitat. Surveys shall be conducted in accordance with CDFG standard procedures for pre-construction surveys. If CTS are found in the construction areas, the University shall consult with CDFG and USFWS to determine if salvage of salamanders is warranted, and if so, what method should be used. The construction area shall be calculated and identified on construction drawings, and the area of impacts shall be monitored by the contractor during construction.
 - (2) Construction vehicles shall be limited to a speed of 10 mph. This speed limit shall be stipulated in all construction contracts and enforced through regular monitoring of construction sites by the County. Any fuels on these sites shall be double contained and excess asphalt shall be removed from the site upon completion of construction.

Page 4.8-32. The discussion of mitigation measures for California tiger salamander is revised:

BIO-1(a) through (3): Option 2: Alternative CTS Mitigation Program (not proposed by project applicant)

- (a) In order to ensure that there is no net loss of CTS habitat and to provide for the long-term protection and management of CTS habitat at Stanford:
 - (1) Prior to Architectural and Site Approval of development of sites in the project area north of JSB that contain occupied CTS habitat (including, but not limited to, the Lathrop District, the Stable Site, Lower Knoll, Gerona Triangle, and the open areas around Lake Lagunita), Stanford shall provide for the long-term protection and management, through easements or other equally protective mechanism, of an amount of land equal to 3 times the acreage of the occupied portion of the site to be developed.

Page 4.8-34. BIO-1(f) through (k) is revised to read:

- (f) Stanford shall retain a qualified biologist to conduct focused floristicallybased surveys for special status plants following the California Department of Fish and Game's "Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities" prior to the project-level siting application for approval of any new development project within undisturbed areas (i.e., the Lathrop foothills research facilities Development, and and recreational improvements). The purpose of these surveys will be to located and identify any special-status plants that may occur in the proposed construction zone. The survey shall be included with Stanford's application for the necessary planning permits from the County or conducted during the analysis process as appropriate.
- (g) The designated construction zone for new facilities shall be designed to provide, to the extent feasible, an exclusionary buffer from any specialstatus plant resources discovered (recommend a minimum 30-foot buffer, with exact size of buffer to be determined in consultation with the California Department of Fish and Game on a case-by-case basis, depending upon the species to be impacted)....
- (j) All special-status plants within the construction zone shall be transplanted (after seed and cuttings have been secured and propagated for translocation) on Stanford lands in consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service. Lost <u>special-status</u> plant habitat shall be replaced and/or known rare plant habitat preserved at a ratio to be determined in consultation with CDFG on a case-by-case basis, depending upon the degree of rarity of the species in question. -at a ratio of two acres of replacement habitat for each acre of special status plant habitat-lost. Seed and cuttings shall be used for translocation efforts as needed to meet the minimum success criteria. Stanford shall provide for long-term protection and management of the replacement habitat, through easements or other equally protective mechanism.
- (k) Stanford shall provide funding for the County to retain a qualified biologist to monitor the mitigation sites annually for five years using success criteria developed in coordination with the California Department of Fish and Game and U.S. Fish and Wildlife Service. The success of the transplantation program shall be considered to have been achieved if 80% or more of the transplanted plants have survived five years after transplantation. <u>The</u> <u>translocation and monitoring shall continue until the success criteria are met</u>.

Page 4.8-34. The following mitigation option is inserted after the first paragraph:

<u>BIO-1 (a) through (e) - Option 3: Federal and State Alternative CTS</u> <u>Mitigation Program (proposed by the United States Fish & Wildlife Service</u> and California Department of Fish and Game)

- (a) In order to ensure that there is no net loss of CTS habitat and to provide for the long-term protection and management of CTS habitat at Stanford:
 - (5) Lake Lagunita shall be preserved as a salamander breeding location, and the Lagunita "campus open space" shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
 - (6) The existing driving range shall be restored to grassland and oak savanna, which shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
 - (7) Existing open space areas (upland summer refuge areas) at the Lower Knoll, Gerona Triangle, Lathrop District and existing open areas that connect these districts to the Lake Lagunita salamander breeding location shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
 - (8) Several large, recessed channels covered by open grates at road level, with barriers to guide salamanders in and to keep them off Junipero Serra Boulevard, shall be constructed to allow for CTS migration and habitat areas south of JSB.
- (b) Same as described for Option 1.
- (c) Same as described for Option 1.
- (d) Same as described for Option 1.
- (f) Same as described for Option 1.

<u>After</u>

Mitigation: Less than Significant

BIO-1(a) through (e) - Option 3 would mitigate for potential impacts to California tiger salamander by permanently preserving existing habitat for CTS, restoring additional lands for habitat, and constructing facilities to reduce road kills. Under this option the ratio of habitat protected to habitat developed would be 3.25:1. Option 3 provides for the long-term protection of CTS habitat by requiring dedication of conservation easements or other comparable land use controls over the habitat. Very little occupied CTS habitat would be developed and habitat would be created and/or preserved. These measures would protect upland habitat in close proximity to viable breeding habitat in perpetuity. The impact after mitigation is therefore considered less than significant

Page 4.9-10. Item (a) of Mitigation Measure HA-1 is revised as follows:

Mitigation: HA-1: Protection of Historic Resources

(a) If a construction project to be carried out pursuant to the General Use Permit includes remodeling of, or development that could physically affect, a structure that is included in the Santa Clara County Heritage Resource Inventory, the California Register of Historical Resources, or the National Register of Historic Places, or that County planning staff determines is eligible for listing or is a potential historic resource, the following shall apply:

- 1. Remodeling: The remodeling shall be conducted following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). If the structure to be remodeled is not on the County Inventory, but is 50 or more years old, Stanford will assess the structure to evaluate whether it appears eligible for inclusion in the County Inventory, and will submit its assessment to County planning staff for independent review. If County planning staff determines that the structure is potentially eligible for the Inventory, or is a potential historic resource, planning staff will submit the assessment to the Santa Clara County HHC for review. If the structure is determined to be eligible, then the mitigation described above shall be required.
- 2. New Development: New development plans shall be reviewed by the Santa Clara County HHC for appropriateness of design and siting to ensure that the historical significance of the structure is not adversely affected. If the structure is listed on the California Register or the National Register, the HHC shall request SHPO comment prior to approving the proposed project.

This would mitigate the impact of the remodeling <u>or adjacent development</u> to a less-than-significant level as identified is Section 15064.5 of the CEQA Guidelines.

If the structure to be remodeled is not on the County Inventory, but is 50 or more years old, Stanford will assess the structure to evaluate whether it appears eligible for inclusion in the County Inventory, and will submit its assessment to County planning staff for independent review. If County planning staff determines that the structure is potentially eligible for the Inventory, or is a potential historic resource, planning staff will submit the assessment to the Santa Clara County HHC for review. If the structure is determined to be eligible, then the mitigation described above shall be required.

Page 4.9-12. Item (b) of Mitigation Measure HA-2 is revised as follows:

(b) Should previously unidentified historic or prehistoric archaeological resources be discovered during construction, the contractor shall cease work in the immediate area and the County and Campus Archaeologist shall be contacted. The County may choose to retain an independent archaeologist to evaluate the site. <u>and provide mitigation</u>. Either Stanford's archaeologist-or an independent archaeologist retained by the County-shall assess the significance of the find and make mitigation recommendations (e.g., manual excavation of the immediate area), if warranted. If performed by Stanford's archaeologist, the assessment shall be forwarded to County planning staff for independent review. <u>If the County deems it appropriate</u>, the County may hire an independent archaeologist to review the finds, proposed treatment plans, and reports prepared by the Campus Archaeologist.

Page 4.9-13. Item (c) of Mitigation Measure HA-2 is revised as follows:

(c) In the event that human skeletal remains are encountered, the applicant is required by County Ordinance No. B6-18 to immediately notify the County Coroner. Upon determination by the County Coroner that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to subdivision (c) of section 7050.5 of the Health and Safety Code and the County Coordinator of Indian affairs. No further disturbance of the site may be made except as authorized by the County coroner in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts. If artifacts are found on the site the Campus Archaeologist a qualified archaeologist shall be contacted along with the County Planning Office. No further disturbance of the artifacts may be made except as authorized by the County coroner in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts.

Page 4.10-14. Item (b) of Mitigation Measure PS-1B is revised as follows:

(b) Stanford shall provide funding for the PAFD <u>negotiate fire protection services</u> to maintain at least 0.88 fire suppression personnel for each 1,000 additional daytime population at Stanford. The PAFD shall review the need for and to maintain an adequate <u>level of additional equipment</u> in response to the increased population, and Stanford shall fund this new equipment as necessary.

Page 4.10-16. The first sentence in the fifth paragraph is revised to read:

Based on a 1999 study prepared for the PAUSD by Lapkoff and Gobalet Demographic Research, Inc. (September 2 28, 1999), the estimated ...

Page 4.10-17. The last paragraph is revised to read:

Projected enrollment through 2010 <u>under the District's Medium forecast</u> is 4,200 5,082 for elementary schools, 2,258 2,680 for middle schools, and 3,346 4,202 for high schools,

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

or $9,804 \underline{11,985}$ students total. Total enrollment in 2010 is projected to be about the same as total enrollment in the 1999-2000 academic year, but with fewer elementary and middle school children and more high school children. Enrollment is expected to peak between 2003 2010 and 2007 2011. The addition of 239 to 584 students from planned University housing will increase total enrollment by 2.4 to 6.0 4.9 percent by 2010. Enrollment projections were prepared before the University's draft CP and GUP application were released.

Page 4.10-18. Mitigation Measure PS-2 is revised to read:

Mitigation: PS-2: Payment of Statutory School Impact Fees

By law, the only mitigation of school impacts that the County can require is payment of statutory school impacts fees. In this case, however, Stanford University and the PAUSD have been working together to arrive at an agreement whereby Stanford would provide money or land to the school district. The impact will be mitigated to a less than significant level through imposition of statutory school fees. Performance of the terms of an agreement between Stanford and the PAUSD in which Stanford provides money, property, or other consideration to the PAUSD in an amount that the PAUSD deems equal to or more than the value of the statutory school fees, may also occur. If the money or land that Stanford provides to the PAUSD through the agreement is meant to replace the statutory school fees, such intention shall be clearly articulated in the agreement. Otherwise, the County will continue to refer all building permit applications to the PAUSD for payment of school fees at the time of permit issuance.

Page 4.12-18. Add the following bullet to the list of measures included in Mitigation Measure NOISE-1.

 For construction areas adjacent to the Palo Alto city limit, construction hours shall be limited to 8:00 AM - 7:00 PM, Monday through Friday, 9:00 AM - 7:00 PM, Saturday, and prohibited on Sundays and holidays.

CHAPTER 5

Page 5-3. Table 5-1 is revised as follows:

Table 5-1

Population and Housing Growth at Stanford and Nearby Jurisdictions (1990-2000)

Jurisdiction	1990 Population	1990 Housing Units	2000 Population	1999 Housing Units***
Stanford CDP*	18,097	956 faculty/staff units 8,658 <u>8,564</u> students housed	12,358**	989 faculty/staff units 9,354 students housed
Palo Alto	55,900	25,188	61,500	25,952
Menlo Park	28,403	12,428	31,800	12,723
Santa Clara County	1,497,577	540,240	1,736,700	581,532
		Sources	U.S. Concus Bureau 1	900 Census California

Sources: U.S. Census Bureau, 1990 Census California Department of Finance, Stanford University web site

* The Stanford Census Designated Place (CDP), a U. S. Census Bureau geographical designation that includes lands within the City of Palo Alto, thus the population number for 1990 is higher than the actual population of the campus.

** Estimate of the 2000 Stanford campus resident population (See Table 4.3-1). This is not the same geographic area as the Stanford CDP defined in the 1990 Census. Year 2000 Census data for the Stanford CDP was not available as of June 2000.

*** 2000 housing unit information not available from the Department of Finance as of June 2000.

CHAPTER 6

Page 6-5. Section 6.3 of Draft EIR (Cumulative Impacts) will be revised to include the following Section:

6.3.F San Mateo County Projects

The following large-scale projects were identified within the San Mateo County limits near the Stanford Community Plan boundary.

 Hewlett Foundation Headquarters office building at the Southwest corner of Sand Hill Road and Santa Cruz Avenue is a 48,000 square-foot office building located on a 6-acre site immediately west of the Community Plan boundary. The San Mateo Planning Commission recently approved a use permit for this project and the County expects construction to proceed within approximately six months.

OCTOBER 2000

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR CHANGES TO THE TEXT OF THE DRAFT EIR

 Chargin office project at the Northwest corner of Sand Hill Road and Santa Cruz Avenue includes remodeling of an existing 2,500-square foot house and construction of 1,400 square feet office of new commercial space located immediately west of the Community Plan boundary. The County recently circulated a Negative Declaration for this project. Hearings will be held before both the San Mateo Planning Commission and Board of Supervisors for this project.

CHAPTER 7

Page 7-57. The text starting with the second paragraph is revised to read:

Of the build alternatives, the Reduced Project alternative would not avoid significant impacts associated with the Project, but would lessen some impacts. The environmentally superior alternative would consist of the Reduced Project with appropriate mitigation measures as described for the proposed project, plus include several of the Alternative Components that have been designed to reduce impacts of the project. They include:

- AGB-A, the revised academic growth boundary that coincides with existing developed areas of the campus;
- LU-A and LUC, which change the golf course to Campus Open Space and designate undeveloped lands south of JSB as Open Space and Field Research;
- LU-E, which allows the County to identify additional lands for Special Conservation designation;
- TRAN-A, the "no net new commute trips" standard (although the County cannot require this of Stanford);
- TRAN-C, which dedicates an easement for trail routes identified in the CP;
- HOUS-A, which provides a linkage between academic development and housing; and
- HOUS-J, modified to eliminate housing only on the Lower Knoll site, with housing to be relocated to Escondido Village.

Collectively, these components avoid significant impacts to open space associated with changing land use south of JSB to Academic Campus. Impacts to California tiger salamander habitat are also reduced. Housing impacts are addressed by linking academic development to housing. Transportation impacts are reduced, but not eliminated by the trip reduction (TDM) measures incorporated in component TRAN-A. The Reduced Project lessens, but does not eliminate growth inducing impacts, which would still be significant.

CHAPTER 8

Page 8-3. The following items are added to the References Section of Chapter 8 of the Draft EIR:

CDMG 1996. Probabilistic Seismic Hazard Assessment for the State of California, CDMG Open-File Report 96-08. 18 December

California Division of Mines and Geology (CDMG) 1997. Guidelines for Evaluating and Mitigating Seismic Hazards in California, CDMG Special Publication 117.

Wald, D.J., Quitoriano, V., Heaton, T.H., and Kanamori, H. 1999. Relationships between Peak Ground Acceleration, Peak Ground Velocity, and Modified Mercalli Intensity in California, Earthquake Spectra, V. 15, No. 3, pp. 557-564. August

14 MITIGATION MONITORING AND REPORTING PROGRAM

14.A INTRODUCTION

This Chapter presents the Mitigation and Monitoring Program for the Stanford University Community Plan and General Use Permit. The mitigation measures are presented in four sections; Compliance with Existing Programs, Planning Measures, Construction Measures and Operation and Maintenance Measures. More mitigation will be required in review of individual projects and will be identified, conditioned, and incorporated into individual project monitoring programs at that time.

- Section 14.B Compliance with Existing Programs. This section presents the applicable federal, state, regional, county and local policies and regulations that which the Project must comply.
- Section 14.C Planning Measures. This sections contains mitigation measures that are to be implemented during the planning and design of each project. These measures often required refinement of the final project design to accommodate particular constraints.
- Section 14.D Construction Measures. This section contains mitigation measures to be implemented prior to, during, and immediately following project construction. These measures generally require the construction manager to follow certain constraints during construction and to repair and rehabilitate impacts resulting from construction of each project
- Section 14.E Operation and Maintenance Measures. This section contains mitigation measures to be implemented during operation of the project. These measures generally require monitoring of system operations over time and the modification of operations to reduce adverse environmental impacts.

14.B COMPLIANCE WITH EXISTING PROGRAMS

BIO-7: Implement Santa Clara County's Tree Preservation Ordinance

Development projects will be sited and designed to minimize loss of trees protected by the Santa Clara tree ordinance.

If protected trees will be removed or impacted by project activities, Stanford shall implement the construction management practices and tree replacement requirements set forth in the County's tree ordinance.

Impacts Mitigated: Loss of trees protected by Santa Clara County's tree preservation ordinance.

Lead Agency: Santa Clara County

Implementing Agency Stanford University

Timing: Start: Project design/review.

Complete: End of Construction

14.C PLANNING MEASURES

OS-2: Cluster Development in Lathrop Development District

To mitigate for potential loss of open space in the Lathrop District, the 20,000 square feet of development proposed in the GUP shall be clustered adjacent to the existing development (golf course club house or Center for Advanced Study in Behavioral Sciences) south of Junipero Serra Boulevard.

In addition to this measure, areas proposed as Campus Open Space in the CP will offset loss of existing Academic Reserve and Open Space areas within the central campus. Additional measures to mitigate for impacts of housing on El Camino Real are discussed below under Impact OS-4.

Impacts Mitigated: Lead Agency: Implementing Agency

tigated:Loss of recognized open space.Agency:Santa Clara CountyAgencyStanford University/Santa Clara CountyTiming:Start:CP/GUP approval and/or individual project design/review.

Complete: Prior to approval of any individual projects in the Lathrop area

OS-3A: Improvement of Parks

	In addition to designating lands for use as parks, Stanford shall improve parks in the faculty area in such a way as to provide suitable recreational opportunities for the campus population and shall continue to provide neighborhood recreation opportunities in new residential areas. At a minimum, the park improvement shall provide facilities equal or greater to those lost from development of proposed GUP housing sites.		
Impacts Mitigated:	Recreational opportunities for existing or new campus residents and facility users.		
Lead Agency:	Santa Clara County		
Implementing Agency	Stanford University		
Timing:	Start: CP/GUP Approval.		

Complete: Phased as residential development under the GUP proceeds.

OS-3B: Dedication of Trails

To replace and expand recreational opportunities in the foothills, Stanford shall also dedicate the trail easements shown on the County Trails Master Plan. Stanford will work with the County Parks Department to clarify the process for developing the easement agreement, to identify the general location and type of uses that will be permitted for the trails being dedicated, and to discuss future construction and management considerations. The proposed location of the trail corridors will need to address conflicts with existing agricultural leases and sensitive riparian habitats along the adjacent creeks. Dedication of the trail corridors does not include a requirement for Stanford to make any improvements to the trail corridors at this time, but such improvement may be agreed to by Stanford and the County Parks Department. Dedication shall be phased as academic and residential development under the GUP proceeds.

Impacts Mitigated: Recreational opportunities for existing or new campus residents and facility users.

Lead Agency:	Santa Clara County		
Implementing Agency	Stanford University/Santa Clara County Parks and Recreation Department		
Timing:	Start: CP/GUP Approval.		
	Complete:	Phased as academic and residential development under the GUP proceeds.	
OS-4: Protect Visual Quality Alo	ng El Camin	o Real	
	Stanford University shall develop an overall design for the streetscape on the south side of El Camino Real. The development of CP housing sites "I" and "D" shall be incorporated into this overall design. Landscaping with drought resistant native plants should be encouraged. This overall design shall be submitted to the City of Palo Alto Planning Division for review, and shall be submitted to the County Planning Office for approval prior to, or in connection with the first application for development along El Camino Real. Stanford is encouraged to incorporate a 25-foot setback from El Camino Real into the design, consistent with City of Palo Alto zoning requirements for multifamily housing along arterial streets.		
Impacts Mitigated:	Foreground or middle ground views from a high volume travel way (excluding scenic routes and scenic highways), recreation use areas, or other public use areas.		
Lead Agency:	Santa Clara County		
Implementing Agency	Stanford University		
Timing:	Start: Project design/review.		
	Complete:	Prior to approval of development along El Camino Real.	

OS-6: Control Light and Glare

	A lighting pla development show the externation outdoor lightiv with high bear glow shall no	all be prepared and approved by the County for each ect that would include exterior light sources. The plan shall f illumination that would be projected from proposed State of the art luminaries shall be used where necessary, fficiency, sharp cut-off, and glare and spill control. Upward allowed in residential or academic uses.		
Impacts Mitigated:	Light source or glare affecting private residences, passing pedestrians, or motorists.			
Lead Agency:	Santa Clara County			
Implementing Agency	Stanford University			
Timing:	Start:	Project design/review.		
	Complete:	Prior to construction		

PH-3A: Identify Additional Housing Sites

In conjunction with neighboring communities, Stanford shall continue to identify additional sites, on- and off- campus, that are suitable for housing development and could accommodate additional housing units over and above the number included in the project. Such sites should be developable within the time period covered by the project and be suitable for the types of housing that would address the current and future shortfall of faculty/staff and postgraduate housing.

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - PLANNING MEASURES

Impacts Mitigated: Demand for housing thereby causing indirect environmental impacts. Lead Agency: Santa Clara County Implementing Agency Stanford University/Santa Clara County Timing: Start: CP/GUP approval Complete: Ongoing

PH-3B: Condition New Academic Space on the Construction of Housing

As a condition of approval for additional academic space, Stanford shall be required to construct housing prior to, or concurrently with, any increase in academic space. The commitment shall include 500 student and 175 hospital and postgraduate units within 2 years of GUP approval, 500 additional student units within 4 years of GUP approval, and 335 faculty and staff units within 6 years of GUP approval. This housing commitment shall be completed or permitted by the time an additional 1,000,000 square feet of academic development occurs. For approval of academic development above 1,000,000 square feet, further increments of housing shall be required. Seventy-five percent of the GUP housing shall be constructed by the time a total of 1,500,000 square feet of academic development occurs, and 100 percent of the housing shall be completed by the time 2,000,000 square feet of academic development occurs. If additional academic development beyond 1,000,000 square feet is desired prior to year 6 of the GUP implementation, the housing commitment would need to be accelerated.

Impacts Mitigated: Demand for housing thereby causing indirect environmental impacts. Lead Agency: Santa Clara County Implementing Agency Stanford University/Santa Clara County **Timing:**

Start: CP/GUP approval.

Complete: Prior to construction of additional academic space and time thresholds as defined in the measure.

TR-5A: Tier 1 Intersection Capacity Expansion

Arboretum Road and Palm Drive (Palo Alto and Stanford University). Mitigation at this intersection would require adding an exclusive northbound left turn lane.

Welch Road and Campus Drive West (Palo Alto and Stanford University). Mitigation at this intersection would require adding a westbound right turn lane.

Impacts Mitigated: TR-5: Transportation impacts at identified intersections

Lead Agency: Santa Clara County

Implementing Agency Stanford University

> Timing: Start: CP/GUP approval.

> > **Complete:** No later than 2005

TR-5B: Trip Reduction and Monitoring

Implementation of Measure TR-5B: Trip Reduction would require the implementation of existing and new TDM measures and a monitoring program. This program is anticipated to reduce the amount of commute trips,

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP – PLANNING MEASURES

so that the net commute trips with CP/GUP would not increase.

The use of TDM to control commute trips would allow Stanford to continue working toward the goal of "no net new commute trips", and also reduce impacts to freeways and other roadways as described in Impacts TR-4 and TR-6. However, direct monitoring by the County will be required to determine compliance with the conditions if Stanford chooses this mitigation alternative.

Monitoring will continue to gauge the effectiveness of these measures. A traffic monitoring program will need to be developed for the project to determine the baseline for current traffic volumes and to measure traffic over the coming years as the CP/GUP is implemented. Monitoring will be conducted by a qualified consultant retained by the County.

To monitor compliance with the TDM standard, a cordon line will be developed to monitor CP/GUP related traffic. The cordon line would isolate all traffic into and out of Stanford University. A cordon line completely encircles an area and all roads leading into and out of the area to be counted. The following is a preliminary list of the cordon intersections. Figure 4.4-16 from the Draft EIR illustrates the cordon line around Stanford.

- 1. Campus Drive West, east of Junipero Serra Boulevard
- 2. Stockfarm Road, south of Sand Hill Road
- 3. Welch Road, east of Oak Road
- 4. Quarry Road, east of Campus Drive West
- 5. Palm Drive, west of Arboretum Road
- 6. Lasuen Street, west of Arboretum Road
- 7. Galvez Street, west of Arboretum Road
- 8. Serra Street, west of El Camino Real
- 9. Yale Street, north of Stanford Avenue
- 10. Wellesley Street, north of Stanford Avenue
- 11. Oberlin Street, north of Stanford Avenue
- 12. Escondido Road, north of Stanford Avenue
- 13. Bowdoin Street, north of Stanford Avenue
- 14. Raimundo Way, north of Stanford Avenue
- 15. Santa Maria Avenue, east of Junipero Serra Boulevard
- 16. Campus Drive East, east of Junipero Serra Boulevard

The following steps will be followed for the peak hour traffic monitoring.

1.**Traffic Volume Counts**. During the AM peak hour and the PM peak hour, the total amount of traffic crossing the cordon line will be counted by travel direction. The monitoring will be from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM. The peak hour within the two-hour count period will be calculated based on total traffic volumes to determine the campus-wide peak hours.

2. License Plate Survey. All vehicles will also need to be identified in order that through trips can be removed from the total volume. Through trips will



be identified by recording the last four digits of the license plate on each vehicle. Five-minute increments of time will be noted on the survey forms in order to determine when a vehicle crosses the cordon in either direction. In the past, approximately 75 percent of the license plates have been able to be recorded for the heavily traveled roadways and nearly 100 percent for the lighter traveled roadways. These percentages will adequately estimate the amount of through traffic across the campus.

3.License Plate Matching. Matching license plates will be determined by comparing numbers that crossed both an entering and exiting cordon within a defined period (e.g., 20 minutes). Vehicles that enter and exit the cordon within the time period will be through trips across the campus without a campus-related purpose.

4.Adjust Cordon Volumes. Several parking lots along Campus Drive West and Stockfarm are inside the cordon, but serve hospital uses. These correctly include Stockfarm, Stockfarm Expansion, Stockfarm Wedge, PS-1, Beckman West, Beckman South, East of Fairchild, MSOB, Welch Road, Oak Road, Dean's Lawn, Evening Shift, Mudd, and Keck. Three lots along Quarry Road are outside the cordon, but serve campus uses. These include Quarry South, Quarry Psychiatry, and Rectangle. The driveways to these lots will be counted with tube counters. Hospital trips will be subtracted from the cordon and campus trips will be added to the cordon count. The cordon count adjustment will also need to factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hour each lot will need to be scanned to determine if any incorrect parking has occurred. If campus parking permits are observed in hospital lots, they will be added back into the cordon count. If hospital trips are observed in the campus lots they will be subtracted from the cordon count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots.

5.Determine Cordon Line Traffic. Total entering and total exiting traffic will be summed for the 16 cordon stations. A single peak hour will be determined for the entire campus based on the traffic volumes. The percent of through trips calculated by the license plate matching from Item 3 above will be removed. The through vehicles will be removed from both the inbound and the outbound traffic since they will have been observed crossing both an entering and exiting cordon line. Finally, the entering and exiting traffic for hospital uses along Campus Drive West and the campus uses in the Quarry Road lots calculated in Item 4 above will be subtracted from or added to the cordon counts

 Impacts Mitigated:
 Transportation impacts due to increased project-generated vehicle trips

 Lead Agency:
 Santa Clara County

 Implementing Agency:
 Stanford University

 Timing:
 Start:

 Baseline traffic counts in first year of GUP approval

 Complete:
 Ongoing on an annual basis

TR-5C. Cooperative Trip Reduction

Stanford may be recognized for participation in initiatives, either on its own or in cooperation with other jurisdictions or agencies, that contribute to reduction of trips in the area surrounding the campus. The County may elect to credit Stanford towards achievement of the "no net new commute trips" STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - PLANNING MEASURES

> standard for participation in these initiatives, to a degree commensurate with the predicted or actual number of trips reduced and the proportion of the cost of the initiative that Stanford is contributing. Only programs that would lead to trip reduction in the area bounded by US 101, Willow Road/Sand Hill Road, Interstate 280, and Page Mill Road may be considered for this credit.

> For each program in which Stanford intends to participate, a proposal shall be submitted to the County Planning Office for review and approval in order to receive the credit. The proposal shall describe the program, identify Stanford's role and contribution to the overall cost, and propose a monitoring method and/or mechanism for calculating commute trips reduced. The County Planning Office may elect to modify the monitoring method or trip reduction calculation proposed, or may choose not to approve credit towards trip reduction for Stanford's participation in the program. Once the County Planning Office has accepted the proposal and the program implementation begins, the County Planning Office will factor a calculation of the trip reduction credit into its conclusion regarding Stanford's annual compliance with the "no net new commute trips" standard, with the continuing requirement that Stanford provide continuing evidence of its participation in the program in a manner that can be independently verified.

Impacts Mitigated:

Reduction in off-campus commute trips to compensate for increase in oncampus trips

Lead Agency: Santa Clara County

Implementing Agency Timing:

Stanford University/Partnering jurisdictions **Start:** Upon proposal by Stanford

Complete: Ongoing on an annual basis

TR-5D. Tier 2 Intersection Capacity Expansion

Tier 2 intersection improvements would only be required if trip reduction monitoring determines that Stanford commute trips are increasing. Many of these intersections are located in jurisdictions other than Santa Clara County, and the County does not have control over approval of the modifications.

If these mitigation measures are needed, Stanford's contribution to the cost of the modifications would be determined by the project's percentage contribution toward the intersections impact. The jurisdiction may choose to use the funds that Stanford contributes for the intersection modifications or for trip reduction measures that benefit the intersection in question. This limitation on Stanford's contribution to the funding does not include those intersections within Menlo Park for which Stanford has agreed to pay the entire cost of a defined set of modifications, if the City chooses to pursue these changes.

El Camino Real and Valparaiso Avenue (Menlo Park). Mitigation at this intersection would require changing the right-turn only lanes in both the northbound and southbound directions to shared through/right lanes.

El Camino Real and Ravenswood Avenue (Menlo Park). Mitigation at this intersection would require changing the exclusive right turn lanes in both the northbound and southbound directions to shared through/right lanes.

El Camino Real and Middle Avenue (Menlo Park). Mitigation at this intersection would require adding a southbound right turn lane. This improvement is not considered feasible because right-of-way would need to be acquired from the Safeway parcel, the sidewalk would have to be

relocated, and landscaping would have to be removed.

Junipero Serra Boulevard and Alpine Road / Santa Cruz Avenue (Menlo Park). Mitigation at this intersection would require adding an eastbound right turn lane.

Sand Hill Road and Sand Hill Circle and I-280 (Menlo Park). Mitigation at this intersection would require adding an exclusive eastbound left turn lane.

Sand Hill Road and Santa Cruz Avenue (Menlo Park). Mitigation at this intersection would require adding a westbound right turn lane.

Sand Hill Road and Oak Avenue (Menlo Park). Mitigation at this intersection would require adding a through lane in both the eastbound and westbound directions.

Middlefield Road and Willow Avenue (Menlo Park). Mitigation at this intersection would require the addition of an eastbound right turn lane. The existing right turn lane is proposed in the future to be a shared through/right. To eliminate impacts at this intersection an eastbound right turn lane will be needed. To make this improvement, right-of-way will need to be acquired, the sidewalk relocated, and existing landscape removed.

El Camino Real and Churchill Avenue (Palo Alto). Mitigation at this intersection would require adding a westbound right turn lane and changing the shared left/right turn to an exclusive left turn lane. This improvement is physically feasible with the purchase of right-of-way, and relocation of the existing curb/gutter and sidewalk. An impact occurs at this intersection only with the Project plus the Arena and Theater scenario.

El Camino Real and Stanford Avenue (Palo Alto). Mitigation at this intersection would require adding an eastbound right turn lane. This mitigation is not considered feasible because right-of-way would need to be acquired, which would affect the business located in the southwest corner of the intersection. This improvement may cause added traffic to Stanford Avenue that would be undesirable from a neighborhood perspective.

Middlefield Road and University Avenue (Palo Alto). Mitigation at this intersection would require adding a northbound right turn lane. This improvement is considered technically feasible. To make this improvement, right-of-way would need to be acquired, the sidewalk relocated, and existing landscaping removed. However, the improvement could be made without affecting existing development.

El Camino Real and Palm Drive / University Avenue (Palo Alto). Mitigation at this intersection would require adding a westbound right turn lane. This mitigation is considered technically feasible by moving the existing curb, modifying the access to the CalTrain station, and possibly removing mature landscaping.

Junipero Serra Boulevard and Page Mill Road (Congestion Management Plan in Palo Alto). Mitigation at this intersection would require adding a second southbound right turn lane.

Junipero Serra Boulevard and Stanford Avenue (Santa Clara County). Mitigation at this intersection would require adding a second exclusive westbound left turn lane on Stanford Avenue. Adding a second westbound left turn lane is physically possible. Southbound Junipero Serra will need to be widened to receive the second left turn lane. The widening shall be extended to the Page Mill Road intersection as an extension of the right turn lane that is currently being constructed. This improvement may cause added

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - PLANNING MEASURES

traffic to Stanford Avenue that would be undesirable from a neighborhood perspective.

Junipero Serra Boulevard and Campus Drive West (Santa Clara County). Mitigation at this intersection would require adding a second westbound right turn lane.

Sand Hill Road Widening as Alternate Mitigation. If Sand Hill Road were widened to two lanes in each direction across San Francisquito Creek, along with other improvements identified in the Sand Hill Road project, some of the traffic volumes which use Campus Drive West from the main Stanford Campus and SUMC to I-280 could shift onto Sand Hill Road. The effect of widening Sand Hill Road to a complete arterial would be to reduce Project impacts in some locations. In particular, the shift of traffic from Campus Drive West to Sand Hill Road would eliminate the need for mitigation measures at the intersections of Junipero Serra/Campus Drive West, Santa Cruz/Alpine/Junipero Serra, and Sand Hill/Oak Avenue. Mitigation measures identified for Sand Hill/Santa Cruz and Welch Road/Campus Drive West would continue to be necessary in the event that Sand Hill Road is widened. If Menlo Park approved the widening of Sand Hill Road across San Francisquito Creek, it is likely that they would also approve the entire funded mitigation package from the Sand Hill Road Development Agreement. This agreement included the Sand Hill/Santa Cruz intersection.

Impacts Mitigated:Intersection congestion.Lead Agency:Santa Clara CountyImplementing Agency:Various agencies are responsible for these intersections; Stanford is
responsible for paying their fair share of improvementsTiming:Start:When Stanford commute trips increase as calculated in "no net
new commute trips" monitoring.

Complete: When funds are provided.

TR-6A: Reduce Cut Through Traffic on Residential Streets

Stanford shall participate in any future neighborhood traffic studies initiated by Palo Alto or Menlo Park that address neighborhood cut-through traffic. Stanford's participation shall be for the purpose of determining how much, if any, of the cut-through traffic is attributable to cars travelling to or from the Stanford central campus. The studies in which Stanford could be required to participate would include those for any neighborhood west of Middlefield Road, south of Valparaiso Avenue, east if I-280, and north of Page Mill Road/Oregon Expressway. It is the responsibility of each jurisdiction to contact the County Planning Office at the time of study initiation to alert the Planning Office to the need to enforce this requirement. The relevant jurisdiction may waive this requirement of Stanford if desired at the time of each study. If impacts attributable to Stanford traffic are identified from the studies, Stanford would contribute to the identified mitigation measures to a degree proportional to Stanford's impact.

Impacts Mitigated: Lead Agency: Implementing Agency

ency: Santa Clara County

ementing Agency Stanford University and jurisdictions conducting studies

Timing: Start: Project design/review.

Complete: Ongoing

TR-6B: Require Site-Specific Traffic Studies for Large GUP Projects

Stanford shall be required by the County to prepare site-specific traffic studies for large projects allowed in the GUP development. These projects will potentially include, but not be limited to, redevelopment of Escondido Village, the stable housing site, the Performing Arts Center, the sports arena expansion, Stanford Avenue housing, and major parking structures, among others. These traffic studies will address traffic generation, trip distribution, project access, safety and the effects of the project on nearby streets and intersections, pedestrian and bicycle facilities, parking, transit, and other facilities as deemed appropriate by the County Planning Office. Appropriate mitigation measures will be developed in the study, conditioned through the County review and approval process, and implemented by Stanford to reduce these potential impacts to less than significant levels. The scope of the traffic analysis will be reviewed and approved by the County before the study is undertaken, and the County will review and comment on a draft Report before it is finalized.

Impacts Mitigated: Traffic impacts to surrounding residential neighborhoods.

Lead Agency: Santa Clara County

Implementing Agency

Timing:

Stanford University Start: Project design/review.

Complete: Ongoing

HWQ-1: Manage Stormwater Runoff

In order to prevent site development from contributing to downstream flooding, Stanford shall accomplish the following:

- Construct and operate storm drainage detention facilities;
- Consider site design features that would decrease post-development runoff, including features presented in the Bay Area Stormwater Management Agencies' "Start at the Source – Design Manual for Stormwater Quality Protection and Site Planning for Urban Stream Protection"; and
- Consider the use of diversion of parking lot and building runoff to vegetated swales, pervious pavement, reduced building foot prints, infiltration of storm runoff, and other similar measures to reduce peak runoff rates and increased runoff volumes.

The detention facilities and other site features and measures designed, constructed, and implemented by Stanford shall be sufficient to assure that there is no increase in peak downstream storm runoff following development and that the increased post-development runoff volume does not cause downstream flooding. Santa Clara County shall specify the criteria (including the storm event or events and models) that shall be used by Stanford to design detention facilities, site features, or other measures used to prevent impacts caused by increases in post-development storm runoff. The facilities shall be designed to only temporarily store the storm water runoff and not create extended ponding that could result in mosquito breeding. In establishing the appropriate design criteria (e.g., 100 year, 24 hour storm event), Santa Clara County shall consult with Santa Clara Valley Water District regarding the storm events that Stanford shall use in designing facilities that have sufficient capacity to prevent impacts on downstream storm drainage facilities.

Two alternative approaches are possible for implementation of this mitigation measure:

(a) Stanford shall prepare a site-specific hydrology and drainage study for each individual building project. Based on the results of this study, Stanford shall design, construct, and maintain project specific storm drainage system improvements, site features, or measures that are sufficient to assure that the peak storm runoff leaving the project area does not increase and that the increased runoff leaving the project area does not cause downstream flooding. Individual detention facilities, site features, or measures may serve more than one building project, but Stanford must demonstrate adequate capacity to prevent increased runoff as part of the project application. All detention facilities shall be designed to only store the storm water runoff temporarily and not create extended ponding that could result in mosquito breeding. Prior to storm water facility construction, Santa Clara County shall approve the proposed improvements.

(b) As an alternative to preparing site-specific studies for each project, Stanford can elect to prepare a hydrology and drainage study for all or a specified portion of a particular watershed area. Based on the results of this study, Stanford shall design, construct, and maintain storm drainage improvements that include on-site detention facilities, site features, or measures sufficient to assure that the peak storm runoff leaving Stanford lands covered by the study does not increase as a result of new development, and that the increased runoff does not cause downstream flooding. After approval of such stormwater facility construction by Santa Clara County, no further site-specific hydrology and drainage studies would be required for new development, provided that the stormwater facility is in place prior to issuance of new building permits in the subarea addressed by the study.

Impacts Mitigated: Increased storm water runoff Lead Agency: Implementing Agency

Santa Clara County

Stanford University

Timing:

Start: Project design/review for each project, or for GUP area on a comprehensive level.

Complete: Prior to construction of each project.

HWQ-2: Maintain Groundwater Recharge

- (a) Stanford shall prepare a site-specific groundwater recharge study for each project that is proposed to occur within the unconfined zone.
- Alternatively, Stanford could prepare a recharge study for (b) development proposed to occur in all or a portion of the unconfined zone. The study or studies may be conducted in conjunction with hydrology and drainage studies as appropriate. The study shall identify the extent that new development will occur in the unconfined zone and the estimated average annual groundwater recharge that occurs in that area under pre-development conditions. Based on the results of this study, Stanford shall design, construct, and maintain facilities (e.g. shallow infiltration basins) that offset "lost" groundwater recharge by increasing recharge in other portions of the unconfined zone. The recharge facilities shall be designed to only temporarily store the storm water runoff and not create extended ponding that could result in mosquito breeding. Prior to construction,

Santa Clara County shall approve the "replacement" groundwater recharge facilities. Storm drainage facilities that detain runoff within the project area may also serve as groundwater recharge facilities.

- (c) So as to not pollute the groundwater resource, Best Management Practices and site design features shall be used to maintain the quality of storm runoff diverted by Stanford to groundwater recharge facilities shall be equal or better in quality to the runoff that would have recharged naturally at the developed site.
- (d) In order to avoid overdraft of the groundwater basin during dry periods when Stanford's Hetch Hetchy allocation may be reduced, Stanford shall develop and implement a plan for responding to such a supply shortage. The plan shall include identification of conservation methods, and an evaluation of other potential sources of supply sources, including any treated water supply that may be soon available to Stanford through Santa Clara Valley Water District.

Impacts Mitigated: Change in groundwater levels

Lead Agency: Santa Clara County

Implementing Agency Stanford University

Timing:

Start: Project design/review or for GUP area on a comprehensive basis.

Complete: Prior to construction

HWQ-3: Protect Water Quality

(a) Stanford shall submit a Notice of Intent (NOI) to the State Water Resources Control Board for the construction activities allowed by the GUP to be covered under NPDES General Permit CAS000002. As an alternative, Stanford may also submit additional NOIs for specific major projects. Stanford shall be required to comply with the terms of the NPDES permit at all construction sites (even sites where less than 5 acres are disturbed).. This includes preparation of Storm Water Pollution Prevention Plans (SWPPP) covering all projects involving land disturbance that will be constructed pursuant to the General Use Permit. The SWPPPs shall identify effective Best Management Practices (BMPs) for preventing groundwater pollution caused by any construction activities. The SWPPPs shall also identify BMPs that have been demonstrated to be effective in preventing storm water pollution caused by runoff occurring during construction.

- (b) Prior to any new construction, Stanford shall perform a survey where development is proposed to occur to determine the location of wells that have not been properly abandoned within the proposed site. If any such wells are located on the site proposed for development, Stanford shall perform an investigation to verify that the well was properly abandoned. If Stanford cannot confirm that the well was properly abandoned, Stanford shall take steps to locate and abandon the well in accordance with State and local standards. Stanford shall request assistance and information from the Santa Clara Valley Water District to locate existing inactive wells on sites to be developed and to confirm procedures for properly destroying inactive wells.
- (c) Prior to any construction, demolition, grading, or landscaping within

50 feet from the top of a bank of a Santa Clara Valley Water District watercourse, Stanford shall obtain a permit from the District.

- (d) During construction, Stanford shall monitor the effectiveness of storm water pollution prevention best management practices at all construction sites during and after storm events.
- (e) As a General Use Permit condition, Santa Clara County shall require that, within the boundaries of the unconfined zone, Stanford shall not engage in new land uses or practices (e.g. storage of chemicals in single wall tanks, application of pesticides that could be transported down to the groundwater supply) that could pose a threat to the groundwater supply. If Stanford leases portions of its property in the unconfined zone, Stanford shall notify and require that the leaseholders comply with the restriction regarding land use practices that could threaten the groundwater supply. Santa Clara County will enforce Stanford's compliance with this restriction.

Impacts Mitigated: Reduction in water quality.

Lead Agency: Santa Clara County

Timing:

Implementing Agency

Stanford University

- **Start:** Project design/review for each project and on a comprehensive level.
- **Complete:** Prior to construction of each project

HWQ-4: Best Management Practices for Preventing Post-Construction Urban Runoff Pollution

- (a) Stanford shall implement site improvements for new buildings and parking lots that include BMPs that are effective for preventing postconstruction storm water and groundwater pollution caused by urban runoff, including grassy swales and vegetated filter strips.
- (b) Prior to construction, Santa Clara County Land Development Engineering shall review and approve the proposed post-construction BMPs to assure conformance with the Santa Clara County Urban Runoff Management Plan (URMP).

Impacts Mitigated: Reduction in water quality. Lead Agency: Santa Clara County

Implementing Agency

Timing:

- **ncy** Stanford University
 - : Start: Project design/review for each project.

Complete: At completion of construction of each project

BIO-1 (a-e): California Tiger Salamander

Option 1 CTS Mitigation Program Proposed by Stanford

Under this option, Stanford will continue to implement the mitigation measures outlined in the CTS Management Agreement, in addition to the following measures.

- (a) In order to mitigate net loss of CTS habitat:
 - Prior to Architectural and Site Approval of development of sites that are presently in the CTS Management Zone and which are considered poor quality upland habitat (Driving Range and Stable Site), Stanford shall add to the Management Zone an

amount of land equal to the acreage of the portion of the site to be developed.

- Calculation of the portion of the site to be developed shall include building footprints, roads, paved and unpaved parking areas, and pathways.
- The location of the acreage to be added to the Management Zone shall be contiguous to the existing zone and within the area shown on Figure 4.8-4 as the area of possible future expansion.
- The acreage added to the Management Zone shall be subject to the migitation measures specified in the 1998 CTS Agreement, including site development procedures, grassland/oak woodland management (restrictions on ground squirrel control and vegetation management) to benefit ground squirrels and other rodents and to establish variable grass heights, and biocide restriction.
- (2) Prior to Architectural and Site Approval of development of sites that are presently in the CTS Management Zone and which are considered excellent or good quality upland habitat (Lower Knoll, and Lathrop District), Stanford shall add to the Management Zone an amount of land equal to 3 times the acreage of the portion of the site to be developed.
 - Calculation of the portion of the site to be developed shall include building footprints, roads, paved and unpaved parking areas, and pathways.
 - The location of the acreage to be added to the Management Zone shall be contiguous to the existing zone and within the area shown on Figure 4.8-4 as the area of possible future expansion.
 - The acreage added to the Management Zone shall be subject to the migitation measures specified in the 1998 CTS Agreement, including site development procedures, grassland/oak woodland management (restrictions on ground squirrel control and vegetation management) to benefit ground squirrels and other rodents and to establish variable grass heights, and biocide restriction.
 - In addition, prior to commencement of construction on the Lower Knoll or Lathrop sites, land within the Management Zone south of JSB shall be enhanced with three breeding ponds (two breeding ponds prior to approval of the development of the Lower Knoll and one breeding pond prior to development of any portion of the Lathrop development district). The ponds shall be 50 feet by 80 feet in size. Ponds must hold water for 4 to 6 months but must dry out completely before the onset of winter rains to ensure that non-native predators do not become established. Annual monitoring of the new breeding ponds shall occur until CTS use of the new breeding ponds is demonstrated for at least two consecutive seasons. After project completion, created ponds shall be monitored for use by amphibians for at least 5 years, and less frequently thereafter.

- (b) In order to minimize the potential for loss of individual CTS during project construction, the following measures shall be required for construction of projects in the CTS Management Zone.
 - (1) Pre-construction surveys for CTS shall be conducted during the rainy season prior to construction of any project that would affect potential CTS habitat. Surveys shall be conducted in accordance with CDFG standard procedures for preconstruction surveys. If CTS are found in the construction areas, the University shall consult with CDFG and USFWS to determine if salvage of salamanders is warranted, and if so, what method should be used. The construction area shall be calculated and identified on construction drawings, and the area of impacts shall be monitored by the contractor during construction.
 - (2) Construction vehicles shall be limited to a speed of 10 mph. This speed limit shall be stipulated in all construction contracts and enforced through regular monitoring of construction sites by the County. Any fuels on these sites shall be double contained and excess asphalt shall be removed from the site upon completion of construction.
 - (3) Drift fences (e.g., silt fences or other effective salamander barriers) shall be erected around the project site prior to November 15 to prevent CTS from wandering into areas where they could experience mortality or injury. Efforts to salvage estivating salamanders (i.e., those salamanders who spend summers in the project area) through onsite monitoring during active construction and hand excavation prior to construction, shall be made.
 - In order to minimize the potential for loss of individual CTS during project operation, the following measures shall be required at sites within the CTS Management Zone.
 - (1) Utility boxes and other ground-level fixtures shall be maintained to prevent accidental trapping of salamanders. Outdoor lighting shall be minimized, since artificial light is known to affect amphibian populations. Facilities on the sites shall be kept clean from exposed garbage to avoid attracting potential salamander predators and other nuisance animals. Domestic animals shall not be allowed as regular residents of the sites. The drip-line of oak trees present on site shall be kept clear of structures. Ground squirrel control shall not be allowed. Landscaping features shall be limited to native species, to the extent feasible, that do not require the use of pesticides and fertilizers.
 - (2) Curbs, planters, and other landscape elements shall be designed to direct salamanders away from the building complex, access road, and parking area. Gravel-covered french drains shall be constructed instead of typical storm drains. Utility boxes with as few openings to the surface as possible shall be selected to prevent accidental trappings of salamanders.
- (d) If the CTS is listed as threatened or endangered by the federal government, an appropriate permit will be obtained from the USFWS. The mitigation measures provided herein shall be

(c)

superseded by any subsequent HCP approved by the USFWS, so long as the HCP provides at least as much habitat value and protection for CTS.

(e) The mitigation measures will be binding through the Conditions of Approval for the General Use Permit.

Option 2: Alternative CTS Mitigation Program (not proposed by project applicant)

- (a) In order to ensure that there is no net loss of CTS habitat and to provide for the long-term protection and management of CTS habitat at Stanford:
 - (1) Prior to Architectural and Site Approval of development of sites in the project area that contain occupied CTS habitat (including, but not limited to, the Lathrop District, the Stable Site, Lower Knoll, Gerona Triangle, and the open areas around Lake Lagunita), Stanford shall provide for the longterm protection and management, through easements or other equally protective mechanism, of an amount of land equal to 3 times the acreage of the occupied portion of the site to be developed.
 - The total area for which mitigation shall be provided includes building footprints, roads, paved and unpaved parking areas, pathways, ornamental landscape plantings, and any other areas where CTS habitat will be lost or modified, or where CTS access to habitat will be impeded.
 - The mitigation site shall consist of preserved, created, or restored upland habitat that is located within 500 meters of breeding habitat. Breeding habitat includes Lake Lagunita or created ponds in which successful CTS reproduction has been documented for at least three consecutive seasons. The mitigation site shall be contiguous to the breeding habitat, or contiguous to other open space lands that provide migration and dispersal corridors for CTS to the breeding habitat.
 - A detailed management and monitoring plan shall be created to ensure the long-term maintenance of habitat values on the mitigation lands. The plan shall be approved by the USFWS prior to the Architectural and Site Approval of any project that will affect occupied CTS habitat, and shall address requirements for fencing, vegetation control, enhancement of small mammal populations, maintenance of safe migration and dispersal corridors, and management of other potential sources of mortality (e.g., road kills, utility boxes).
 - The habitat mitigation lands shall be protected through adoption of a permanent conservation easement or other long-term land control mechanism that adequately protects CTS habitat.
 - In addition, prior to commencement of construction on occupied CTS habitat that is within 500 meters of Lake Lagunita (Lower Knoll, Gerona Triangle, or Lathrop

sites), land within the foothills area south of JSB shall be enhanced with three new breeding ponds (these new ponds shall be in addition to any breeding ponds created thusfar). The design, management requirements, and success criteria for the ponds shall be established in consultation with the USFWS. The new breeding ponds shall be monitored annually until successful CTS breeding is demonstrated for at least three consecutive seasons. After successful breeding is demonstrated, development of the Lower Knoll, Gerona Triangle, or Lathrop sites may proceed with the dedication of suitable upland mitigation lands contiguous to the created ponds.

- (b) Same as described for Option 1.
- (c) Same as described for Option 1.
- (d) Same as described for Option 1.
- (e) Same as described for Option 1.

Option 3: Federal and State Alternative CTS Mitigation Program (proposed by the United States Fish & Wildlife Service and California Department of Fish and Game)

- (a) In order to ensure that there is no net loss of CTS habitat and to provide for the long-term protection and management of CTS habitat at Stanford:
 - (1) Lake Lagunita shall be preserved as a salamander breeding location, and the Lagunita "campus open space" shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
 - (2) The existing driving range shall be restored to grassland and oak savanna, which shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
 - (3) Existing open space areas (upland summer refuge areas) at the Lower Knoll, Gerona Triangle, Lathrop District and existing open areas that connect these districts to the Lake Lagunita salamander breeding location shall be protected in perpetuity by a conservation easement or similar enforceable restriction.
 - (4) Several large, recessed channels covered by open grates at road level, with barriers to guide salamanders in and to keep them off Junipero Serra Boulevard, shall be constructed to allow for CTS migration and habitat areas south of JSB.
- (b) Same as described for Option 1.
- (c) Same as described for Option 1.
- (d) Same as described for Option 1.

Same as described for Option 1.

Impacts Mitigated: Impacts to California tiger salamander and loss of habitat.

Lead Agency: Santa Clara County, California DFG and USFWS

Implementing Agency Stanford University

Timing: Start: Project design/review.

Complete: After validation of success; ongoing.

BIO-1 (f-k): Rare, Threatened, and Endangered Plant Protection Program

- (f) Stanford shall retain a qualified biologist to conduct floristicallybased surveys for special status plants following the California Department of Fish and Game's "Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities" prior to application for approval of any new development project within undisturbed areas (i.e., the Lathrop Development, and foothills research facilities and recreational improvements). The purpose of these surveys will be to located and identify any special-status plants that may occur in the proposed construction zone. The survey shall be included with Stanford's application for the necessary planning permits from the County or conducted during the analysis process as appropriate.
- (g) The designated construction zone for new facilities shall be designed to provide, to the extent feasible, an exclusionary buffer from any special-status plant resources discovered (recommend a minimum 30-foot buffer, with exact size of buffer to be determined in consultation with the California Department of Fish and Game on a case-by-case basis, depending upon the species to be impacted)....
- (j) All special-status plants within the construction zone shall be transplanted (after seed and cuttings have been secured and propagated for translocation) on Stanford lands in consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service. Lost special-status plant habitat shall be replaced and/or known rare plant habitat preserved at a ratio to be determined in consultation with CDFG on a case-by-case basis, depending upon the degree of rarity of the species in question.. Seed and cuttings shall be used for translocation efforts as needed to meet the minimum success criteria. Stanford shall provide for long-term protection and management of the replacement habitat, through easements or other equally protective mechanism.
- (k) Stanford shall provide funding for the County to retain a qualified biologist to monitor the mitigation sites annually for five years using success criteria developed in coordination with the California Department of Fish and Game and U.S. Fish and Wildlife Service. The success of the transplantation program shall be considered to have been achieved if 80% or more of the transplanted plants have survived five years after transplantation. The translocation and monitoring shall continue until the success criteria are met.
 Impacts Mitigated: Loss of Rare, Threatened, and Endangered Plants, CNPS List 3 and 4 species, and loss of habitat.
- Lead Agency: Santa Clara County, California Department of Fish and Game and U.S. Fish and Wildlife Service Implementing Agency Stanford University

Timing: Start: Project design/review.

Complete: Validation of transplantation success.

BIO-3: Active Raptor and Migratory Bird Nest Protection Program

	Pre-construction surveys for breeding raptors and migratory birds on the		
	Stanford campus will be conducted to determine the location of active nest		
	sites. If activ	e nest sites are located, Stanford shall consult with a biologist	
	under contract to Santa Clara County, or the California Department of Fish and Game to determine appropriate construction setbacks from the nest sites No construction activities shall occur within the construction setback during		
	the nesting season of the affected species.		
Impacts Mitigated:	Disturbance of active raptor nests, migratory bird nests and native wildlife nursery sites.		
Lead Agency:	Santa Clara County and California Department of Fish and Game		
Implementing Agency	Stanford University		
Timing:	Start:	Project review.	
	Complete:	Ongoing	

BIO-5: Protect Oak Woodland Habitat

Stanford will compensate for the loss of oak woodland habitat through the creation, restoration, and long-term preservation of comparable habitat. Opportunities for restoration and long-term preservation of oak woodland habitat are present within the CTS Management Zone. Restoration of oak woodland habitat shall be conducted at a ratio of 1.5:1 (1.5 acres of restored habitat: 1 acre of developed habitat).

Impacts Mitigated: Loss of oak woodland habitat. Lead Agency: Santa Clara County Implementing Agency Stanford University Timing:

Start: Project design/review. Complete: Ongoing

BIO-9: Wetland Avoidance and Replacement

- (a) Prior to application for Architectural and Site Approval of development of sites within the CP area, Stanford shall retain a qualified biologist to conduct a delineation of potential jurisdictional wetlands and other waters of the U.S. present on the site.
- Development projects will be sited and designed to minimize impacts (b) to jurisdictional wetlands or other waters of the U.S.
- (c) If jurisdictional wetlands or other waters of the U.S. will be unavoidably lost as a result of project activities, Stanford shall obtain appropriate authorization from the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act. In coordination with the U.S. Army Corps of Engineers, any wetlands or other waters of the U.S. that are lost as a result of future development in the project area shall be replaced through the creation, preservation, or restoration of wetlands or other waters of the U.S. of equal function and value to those that are lost.

Impacts Mitigated: Loss of wetlands.

Lead Agency: Santa Clara County

Implementing Agency Stanford University

(a)

Timina:

Start: Project design/review for each project. **Complete:** At completion of each project.

HA-1: Protection of Historic Resources

If a construction project to be carried out pursuant to the General Use Permit includes remodeling of, or development that could physically affect, a structure that is included in the Santa Clara County Heritage Resource Inventory, the California Register of Historical Resources, or the National Register of Historic Places, or that County planning staff determines is eligible for listing or is a potential historic resource, the following shall apply:

1. *Remodeling:* The remodeling shall be conducted following the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995).

If the structure to be remodeled is not on the County Inventory, but is 50 or more years old, Stanford will assess the structure to evaluate whether it appears eligible for inclusion in the County Inventory, and will submit its assessment to County planning staff for independent review. If County planning staff determines that the structure is potentially eligible for the Inventory, or is a potential historic resource, planning staff will submit the assessment to the Santa Clara County HHC for review. If the structure is determined to be eligible, then the mitigation described above shall be required.

2. New Development: New development plans shall be reviewed by the Santa Clara County HHC for appropriateness of design and siting to ensure that the historical significance of the structure is not adversely affected. If the structure is listed on the California Register or the National Register, the HHC shall request SHPO comment prior to approving the proposed project.

(b) Prior to demolishing any structure that is 50 or more years old, Stanford shall submit an assessment of the structure regarding its eligibility for listing to the County planning staff. If the planning staff determines that the structure is potentially eligible for listing, or is a potential historic resource, then a site-specific analysis of the impact and any feasible mitigation measures, including avoidance of the resource, shall be prepared as part of the environmental review of the project and the demolition will be referred to the Santa Clara County HHC for its recommendation prior to County approval of a demolition permit.

- (c) Mitigation measures to protect The Oval from significant impacts during construction and operation of the proposed parking structure shall include, but not be limited to, all of the following.
 - The parking structure shall be designed so that entrance ramps for both vehicular and pedestrian traffic are located far enough to the east and west sides of the Oval, or potentially outside the Oval itself (on the existing roadway or in the "ears" east and

west of the Oval), as to not be noticeable by traffic approaching the main Campus on Palm Drive.

- Above ground ventilation systems, and other necessary structures shall be designed in a manner compatible with a park-like setting (i.e. installing the ventilation ducts below/as part of park benches). Structures will not exceed a ground height of two feet and will be placed to the east and west of the main view corridor so as not to detract the eye from the intended approach to the main Campus.
- During all construction activities, heavy equipment and earthdisturbing activities shall be screened from view by temporary construction fencing.
- Following completion of the proposed parking structure, the Oval will be returned to its pre-construction appearance and opened to public access.
- Impacts Mitigated: Substantial adverse changes in the significance of historical resources as defined in Section 15064.5 of the CEQA Guidelines.
 - Lead Agency: Santa Clara County

Implementing Agency Stanford University

Timing:

Start: Project design/review for each project.

Complete: At completion of each project.

HA-2: Protection of Archaeological Resources

(a) Stanford shall provide a map to the County Planning Office, to be maintained as a confidential record, that shows the location of all known prehistoric and historic archaeological resources in the unincorporated Santa Clara County portion of Stanford lands. If a project proposed pursuant to the General Use Permit were sited on a mapped prehistoric archaeological site, further site-specific analysis will be required to determine whether a significant impact would occur. Site-specific mitigation shall be identified by the County in accordance with the provisions of Section 21083.2 of the Public Resources Code.

(b) Should previously unidentified historic or prehistoric archaeological resources be discovered during construction, the contractor shall cease work in the immediate area and the County and Campus Archaeologist shall be contacted. The County may choose to retain an independent archaeologist to evaluate the site. Stanford's archaeologist shall assess the significance of the find and make mitigation recommendations (e.g., manual excavation of the immediate area), if warranted. If performed by Stanford's archaeologist, the assessment shall be forwarded to County planning staff for independent review. If the County deems it appropriate, the County may hire an independent archaeologist to review the finds, proposed treatment plans, and reports prepared by the Campus Archaeologist.

Construction monitoring shall be conducted at any time grounddisturbing activities (greater than 12 inches in depth) are taking place in the immediate vicinity of archaeological resources discovered as described above. This includes building foundation demolition and construction, tree or tree-root removal, landscape irrigation installation, and utility line excavation.

If data recovery does not produce evidence of significant archaeological resources within the project area, further mitigation shall be limited to construction monitoring, unless additional testing or other specific mitigation measures are determined by a qualified archaeologist (Stanford's archaeologist or an independent archaeologist retained by the County) to be necessary to ensure avoidance of damage to significant archaeological resources. A technical report of findings describing the results of all monitoring shall be prepared in accordance with professional standards. The archaeological monitoring program shall be implemented by an individual meeting the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61); individual field monitors shall be qualified in the recognition of archaeological resources of both the historic and/or prehistoric periods and possess sufficient academic and field training as required to conduct the work effectively and without undue delay.

(c) In the event that human skeletal remains are encountered, the applicant is required by County Ordinance No. B6-18 to immediately notify the County Coroner. Upon determination by the County Coroner that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to subdivision (c) of section 7050.5 of the Health and Safety Code and the County Coordinator of Indian affairs. No further disturbance of the site may be made except in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts. If artifacts are found on the site the Campus Archaeologist shall be contacted along with the County Planning Office. No further disturbance of the artifacts may be made except in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts. If artifacts are found on the site the Campus Archaeologist shall be contacted along with the County Planning Office. No further disturbance of the artifacts may be made except in compliance with all applicable federal, state, and local laws regarding Native American burials and artifacts.

Impacts Mitigated:	Substantial adverse changes in the significance of archaeological resources as defined in Section 15064.5 of the CEQA Guidelines.		
Lead Agency:	Santa Clara County		
Implementing Agency	Stanford University		
Timing:	Start:	Project design/review for each project.	
	Complete:	At completion of each project.	

PS-1A: Maintain Police Services

	a) The S const route	Stanford Police and PAPD would be informed of the ruction, locations, and alternate evacuation and emergency s to facilitate response times during construction periods.	
	b) Stanf on st	ord shall provide funding to maintain at least one sworn officer aff for each 1,000 adjusted daytime population at Stanford.	
Impacts Mitigated:	Increased der	nand for police services.	
Lead Agency:	Stanford University		
Implementing Agency	Stanford University/Santa Clara County		
Timing:	Start:	Project design/review.	

Complete: Ongoing

PS-1B: Maintain Fire Services

Stanford shall negotiate fire protection services to maintain at least 0.88 fire suppression personnel for each 1,000 additional daytime population at Stanford and to maintain an adequate level of equipment in response to the increased population.

Impacts Mitigated: Increased demand for fire services. Lead Agency: Implementing Agency

Stanford University

(a)

Stanford University/contract fire protection agency

Timing: Start: Project design/review.

Complete: Ongoing

PS-1C: Water Conservation and Recycling

Stanford shall embark on an aggressive program of water conservation and water recycling. The conservation program shall include measures to reduce domestic water use (e.g., retrofit existing residences with low-flow toilets and showerheads) and to reduce use of water for irrigation (e.g., require use of drought-tolerant landscaping). The recycling program shall include consideration of recycled water or gray water use for toilet flushing in new buildings. Stanford will continue to implement water conservation measures for proposed new buildings to minimize future water use. Stanford should consider the use of recycled water for turf irrigation for the golf course, athletic fields, and other landscaped areas.

To implement these recommendations, Stanford shall prepare and submit to the County Planning Office a Water Conservation and Recycling Master Plan, which will lay out the proposed measures for reducing potable water use on campus. The Plan shall be prepared following the adoption of the CP and approval of the GUP. This plan shall also address any potential habitat impacts associated with any proposed increase in surface water withdrawals from Stanford creeks. A ten percent reduction in average daily water use would keep water consumption well within Stanford's existing allocation of 3.03 mgd, while a six percent reduction (0.18 mgd), would meet the current allocation. A ten percent reduction in average daily water use is feasible with implementation of the program described above.

(b) If conservation and recycling does not achieve at least a six percent reduction in potable water demand from Hetch Hetchy, the University would have to apply for an increase in the allocation of water from the San Francisco Water Department, and receive approval prior to exceeding the existing allocation.

Impacts Mitigated: Increase in water consumption.

Lead Agency: Implementing Agency

Stanford University

Stanford University

Timing:

Start: GUP Approval/individual project design/review

Complete: Ongoing

PS-1D: Improve the Wastewater Collection System

Mitigation described above to reduce water use would also reduce wastewater generation. If parts of the existing collection system are undersized, including the sanitary sewer lines at Yale Street and Stanford Avenue, Stanford shall replace these lines with larger diameter pipes. The improvements shall be required prior to the approval of projects that would exceed existing capacity. Information of existing capacity and expected wastewater generation for the portion of the system affected shall be provided to the County Planning Office at the time of permit application submittal for a GUP project.

Impacts Mitigated: Lead Agency: Implementing Agency

Stanford University Timing:

Start: Project design/review.

Adequate wastewater collection system

Complete: Ongoing

Santa Clara County

PS-2: Maintain School Capacity

By law, the only mitigation of school impacts that the County can require is payment of statutory school impacts fees. The impact will be mitigated to a less than significant level through imposition of statutory school fees.

In order to continue to address school needs, Stanford is encouraged to voluntarily provide a detailed schedule to the PAUSD as soon as feasible indicating the schedule and unit mix of planned housing so that the timing and pattern of enrollment growth (elementary school, middle school, high school) can be estimated with greater certainty by the School District.

Impacts Mitigated:	: Demand for schools	
Lead Agency:	Santa Clara County	
Implementing Agency	Stanford University	
Timing:	Start:	Project design/review.
	Complete:	Building permit issuance

GI-1: Identify Additional Housing Sites and Implement Traffic and Service Mitigation Measures

The University shall work with the City of Palo Alto, City of Menlo Park, and Santa Clara County to identify additional sites on- and off-campus that would be suitable for housing development to meet the needs of additional workers who will be attracted to the area as a result of the project. Part of this effort shall be the identification of University, city, county, private, state, and federal funding that could be used to assist in the development of housing affordable to low- and moderate-income households and to develop regulatory mechanisms that create incentives for Stanford to participate in off-campus housing initiatives. Provision of additional low- and moderateincome housing would help mitigate the traffic and other impacts of projected employment growth by reducing commute distances and increasing the potential for use of non-auto transportation.

The University shall work with Santa Clara County and the City of Palo Alto to develop and implement appropriate traffic, public services/utilities, and other related mitigation measures to address growth-inducing impacts of the Stanford CP/GUP (refer to Sections 4.4 - Traffic and Circulation, and 4.10 -

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - PLANNING MEASURES

Public Services and Utilities for measures recommended to mitigate project impacts).

Impacts Mitigated:Growth inducementLead Agency:Santa Clara CountyImplementing AgencyStanford University

Timing:

Start:Project ReviewComplete:Ongoing

OCTOBER 2000
14.D CONSTRUCTION MEASURES

HA-2: Protection of Known and Previously Undiscoverd Archaeological resources

- (a) Stanford shall provide a map to the County Planning Office, to be maintained as a confidential record, that shows the location of all known prehistoric and historic archaeological resources in the unincorporated Santa Clara County portion of Stanford lands. If a project proposed pursuant to the General Use Permit were sited on a mapped prehistoric archaeological site, further site-specific analysis will be required to determine whether a significant impact would occur. Site-specific mitigation shall be identified by the County in accordance with the provisions of Section 21083.2 of the Public Resources Code.
- (b) Should previously unidentified historic or prehistoric archaeological resources be discovered during construction, the contractor shall cease work in the immediate area and the County and Campus Archaeologist shall be contacted. The County may choose to retain an independent archaeologist to evaluate the site and provide mitigation. Either Stanford's archaeologist or an independent archaeologist retained by the County shall assess the significance of the find and make mitigation recommendations (e.g., manual excavation of the immediate area), if warranted. If performed by Stanford's archaeologist, the assessment shall be forwarded to County planning staff for independent review.

Construction monitoring shall be conducted at any time grounddisturbing activities (greater than 12 inches in depth) are taking place in the immediate vicinity of archaeological resources discovered as described above. This includes building foundation demolition and construction, tree or tree-root removal, landscape irrigation installation, and utility line excavation.

If data recovery does not produce evidence of significant archaeological resources within the project area, further mitigation shall be limited to construction monitoring, unless additional testing or other specific mitigation measures are determined by a qualified archaeologist (Stanford's archaeologist or an independent archaeologist retained by the County) to be necessary to ensure avoidance of damage to significant archaeological resources. A technical report of findings describing the results of all monitoring shall be prepared in accordance with professional standards. The archaeological monitoring program shall be implemented by an individual meeting the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61); individual field monitors shall be qualified in the recognition of archaeological resources of both the historic and/or prehistoric periods and possess sufficient academic and field training as required to conduct the work effectively and without undue delay.

(c) In the event that human skeletal remains are encountered, the applicant is required by County Ordinance No. B6-18 to immediately notify the County Coroner. Upon determination by the County Coroner that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to subdivision (c) of section 7050.5 of the Health and Safety

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - CONSTRUCTION MEASURES

Code and the County Coordinator of Indian affairs. No further disturbance of the site may be made except as authorized by the County coroner. If artifacts are found on the site a qualified archaeologist shall be contacted along with the County Planning Office. No further disturbance of the artifacts may be made except as authorized by the County Planning Office.

Impacts Mitigated: Substantial adverse changes in the significance of archaeological resources as defined in Section 15064.5.

Lead Agency: Santa Clara County

Implementing Agency

Stanford University

Start: Start of Construction

Complete: End of all Construction

HA-3: Protection of Undiscovered Paleontological Materials

Timing:

In the event that fossilized or unfossilized shell or bone is uncovered during any earth-disturbing operation resulting from development under the proposed project, contractors shall stop work in the immediate area of the find and notify the Campus Archaeologist and the County Building Inspector assigned to the project. The Campus Archaeologist shall visit the site and make recommendations for treatment of the find (including consultation with a paleontologist and excavation, if warranted), which would be sent to the County Building Inspection Office and the County Planning Office. If a fossil find is confirmed, it will be recorded with the USGS and curated in an appropriate repository.

ted: Adverse impacts to paleontological resources or unique geologic features.

Impacts Mitigated: Lead Agency: Implementing Agency Timing:

Stanford University
Start: Start of Construction

Complete: Ongoing

Santa Clara County

TR-7: Construction Traffic Control Measures

The following traffic control measures are required to ensure that access is maintained during construction of Stanford GUP projects.

a. Off-street Parking for Construction Related Vehicles. Stanford shall be required to provide adequate off-street parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the construction sites, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site.

b. Maintenance of Pedestrian Access. Stanford shall be prohibited from substantially limiting pedestrian access during construction of the project, without prior approval from the City of Palo Alto, Department of Public Works. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Pedestrians access-limiting actions would include, but not be limited to, sidewalk closures, bridge closures, crosswalk closures or pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians during the construction

period. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided.

c. Maintenance of Bicycle Access. Stanford shall be prohibited from limiting bicycle access while constructing the project without prior approval from the City of Palo Alto Department of Public Works. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Bicycle accesslimiting actions would include, but not be limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists during the construction period.

d. Restriction on Construction Hours. Stanford shall be required to prohibit or limit the number of construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between the hours of 4:30 PM and 6:00 PM.

e. Construction Truck Routes. Stanford shall be required to deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park. Heavy construction vehicles shall be prohibited from accessing the site from other routes. Figure 8.4-15 illustrates the Stanford area truck routes that must be used by all trucks.

f. Protection of Public Roadways During Construction. Stanford shall be required to repair any structural damage to public roadways, returning any damaged sections to original structural condition. Stanford shall survey the condition of the public roadways along truck routes providing access to the proposed project site before construction, and shall again survey the roadways after construction is complete. A before-and-after survey report shall be completed and submitted to respective city's Department of Public Works for review, indicating the location and extent of damage.

g. Protection and Maintenance of Public Transit Access and Routes . Stanford shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, without prior approval from the VTA or other appropriate jurisdiction. Such approval shall require submittal and approval of a mitigation plan to reduce specific impacts to a less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing bus stops, limiting access to bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.

h. Construction Impact Mitigation Plan. In lieu of the above mitigation measures, Stanford shall submit a detailed construction impact mitigation plan to County prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved.

i. Construction During Special Events. Stanford shall implement a

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - CONSTRUCTION MEASURES

> mechanism to prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events, which attract a substantial number of visitors to the campus. This measure may require a special supplemental permit to be obtained to host such events during significant construction phases.

Impacts Mitigated:Traffic and access impacts from construction activities.Lead Agency:Santa Clara CountyImplementing AgencyStanford UniversityTiming:Start:Prior to start of Construction

Complete: Ongoing

NOISE-1: Reduce Construction Noise

The following measures shall be used to reduce construction-related noise.

- Comply with all the provisions of the County of Santa Clara and the City of Palo Alto Noise Ordinances, including, but not limited to the restrictions on hours of construction and mechanical equipment noise levels.
- Use of a noise-attenuating jacket around the jackhammer.
- Schedule the construction such that the absolute minimum number of equipment would be operating at the same time.
- Use of the latest technology to mitigate construction equipment noise, i.e., engine enclosures, intake and exhaust silencers, etc.
- Construct 8 to 10 foot high temporary walls along the property lines of the project site adjacent to residential areas, where possible, at the beginning of construction to reduce noise impacts on nearby residents.
- Coordinate classroom relocations with school faculties before demolition or site preparation.
- Maintain good relations with the community such as keeping people informed of the schedule, duration, and progress of the construction, to minimize the public objections to unavoidable noise. Communities should be notified in advance of the construction and the expected temporary noise impacts during the construction period.

Impacts Mitigated: Noise impacts from construction activities.

Lead Agency: Santa Clara County

Implementing Agency Stanford University

Timing:

Stanioru Oniversity

Start: Prior to Start of Construction

Complete: Ongoing

STANFORD UNIVERSITY COMMUNITY PLAN/GENERAL USE PERMIT EIR MMRP - CONSTRUCTION MEASURES

AQ-1: Reduce Diesel Emissions

Mitigation measures beyond those required by BAAQMD for all construction projects would be needed to reduce diesel emissions. Currently, there are few "clean fuel" engines in construction equipment fleets, but it is anticipated that this will change over time. Therefore, as a mitigation measure to minimize diesel engine exhaust particulate emissions, Stanford shall require all construction contractors performing work on projects under the GUP/CP to properly maintain the equipment and, where feasible, use "clean fuel" equipment and emissions control technology (e.g., CNG-fired engines, catalytic converters, particulate traps, turbocharged/intercooled engines, 4° of retard for engine timing). Measures to reduce diesel emission would be considered feasible when they are capable of being used on equipment without interfering substantially with equipment performance.

Impacts Mitigated:Noise impacts from construction activities.Lead Agency:Santa Clara CountyImplementing AgencyStanford UniversityTiming:Start:Start:Start of Construction

Complete: Ongoing

14.E OPERATION AND MAINTENANCE MEASURES

NOISE-2: Reduce Operational Noise

	• Mechanical equipment should be acoustically engineered, with the final engineering design of facilities with such equipment reviewed by a qualified acoustical engineer. Design shall incorporate mufflers, enclosures, and parapets so that the noise generated by these operations would not exceed the noise standard at noise sensitive receptor locations.
	• Truck deliveries and trash pick-up should only be permitted between the hours of 7 a.m. and 7 p.m at campus housing units. In academic areas, such activities should only be allowed before or after classes.
	• The project should incorporate design measures to locate noise sources such as loading zones, trash bins, and mechanical equipment as far away from the noise sensitive receptor locations as possible.
	• Separate residential uses from parking structures by at least 150 feet.
Impacts Mitigated:	Operational noise
Lead Agency:	Santa Clara County
Implementing Agency	Stanford University
Timing:	Start: Project design/review
	Complete: Ongoing

PHS-1: Risk Management Plan

If a specific development project is proposed that would involve quantities of hazardous materials that trigger the California Accidental Release Prevention Law requirements, the University shall prepare a Risk Management Plan and shall implement all measures identified in the accident prevention program to reduce the off-site consequences to a point at which the public would not be exposed to harmful levels of hazardous materials. If feasible, the quantities of hazardous materials stored shall be reduced to below the California Accidental Release Prevention law thresholds, or a less hazardous type of chemical shall be used.

Impacts Mitigated:Accidental release of hazardous materials.Lead Agency:Santa Clara CountyImplementing AgencyStanford University

Timing: Start: Project approval Complete: Ongoing