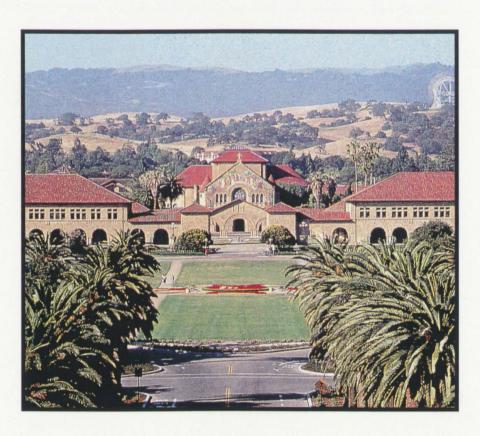
STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT APPLICATION



FINAL
ENVIRONMENTAL IMPACT REPORT
VOLUME IV - APPENDICES



OCTOBER 6, 2000

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ENVIRONMENTAL IMPACT REPORT
VOLUME IV - APPENDICES

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



APPENDIX G DRAFT EIR COMMENT LETTERS

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DRAFT EIR 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 letter number, comment author, and 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 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 Jor Corelis 7/28/00	Letter Number	Comment Author	Comment Date
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	28	Sally Barlow-Perez	7/31/00
30 Allen Cypher 7/31/00	29	Allan Abbott	7/31/00
	30	Allen Cypher	7/31/00

Letter Number	Comment Author	Comment Date
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
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

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Letter Number	Comment Author	Comment Date
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
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

Letter Number	Comment Author	Comment Date
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
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

To: Sarah Jones

From: Christy Holloway and Mary Davey Subject: Revised comments on Stanford DEIR

Date: June 20, 2000

- 1-1 1. The impacts of building all new housing on undeveloped land have not been studied. What are the advantages, from the standpoint of CEQUA, of redevelopment of land where there is already moderate density (e.g. Kingscoat Gardens, Pearce Mitchell) with higher density housing?
- 1-2 2. All proposed housing for the next ten years is planned to be built on undeveloped land except area "G", a redevelopment area designated for student housing. Area "G" raises a policy question because it was single family faculty/staff, low density residential housing. Those homes have been bought by the university and removed from the faculty/staff housing stock. Over time, there have been approximately 30 homes absorbed for "university use" from the faculty/staff housing stock. From the DEIR it appears that County policy considers any removal of housing from the current stock as a negative impact. Is this why current (moderate density) developed lands for faculty/staff housing are not being designated for higher density? Is there an inconsistency here?
- 3. In table 7-3, page 7-47, the conclusion is drawn, in regard to the loss of recreation areas in the faculty staff housing area, that this loss is fully mitigated by the designation of "open space areas" or parks. The areas to be dedicated are a great asset to the residential area but they are all parks that are geared to young children and are not appropriate for field games enjoyed by older children and students. The Mayfield Playfield is a unique resource in the faculty/staff housing area for student and young adults. The conclusion that the loss of the playfield does not represent and adverse affect on campus residential opportunities is not substantiated.
- 4. Tiger salamander habitat and housing: The impact of the development of the tiger salamander habitat in area "F" as graduate student housing deserves closer study. What would be the impact of moving the housing back from the edge of Lake Lauginita and making a permanent dedication of the habitat surrounding the lake? Can these overlapping interests both be served in this area
- 5. Further analysis of the impact of using off campus sites for housing, such as the Mayfield School site, is necessary. Could the County give Stanford credit against their housing needs for the use of these sites? Palo Alto needs housing so they should be amenable to this concept.
- 6. The reduced Project has not been adequately analyzed. The assertion(pg.7-57) that "of the build alternatives, the Reduced Project Alternative would not avoid significant impacts associated with the project" does not appear to be substantiated with any data or analysis. This needs further study. The word "avoid" (as in, stop entirely) would appear to be the wrong selection. If the impacts were "reduced" this could be significant by CEQUA standards. A 1/2 build scenario would significantly reduce the impacts. The reduced build scenario does not tell us if the reduction would be in housing or academic growth or equal between the two areas. Could the alternative of building all the housing and 1/2 the academic development be studied?
- 1-7 7. 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.

Thank you for your consideration.

MARY C. DAVEY 12645 LA CRESTA DRIVE LOS ALTOS HILLS, CA 94022-2512

Phone: 650-941-0876 FAX: 650-941-3022

email: daveymob@ix.netcom.com

July 20, 2000

Honorable Palo Alto City Council and Planning Commission,

To make sure that I made clear my belief that the Carnegie Foundation should not be built beyond Palo Alto's urban services boundary, I have reworded the enclosed statement from the one passed out the other night.

- 1-8 Is it possible to ask the County not to process the Carnegie permit until after the Community Plan is finished?
- 1-9 As was pointed out last evening, I think all of us are beginning to realize the magnitude of Stanford's GUP. To visualize what 4 5,000,000 square feet mean on campus, would it be possible for your staff to create a computer model of what this would look like? Or a photo montage or a three dimensional model?

Thanks for your time and attention last evening and beyond.

"They (campus buildings) shall be built as needed, and no faster...as the necessities of the University may demand, the trustees bearing in mind that extensive and expensive buildings do not make a University; that it depends for its success rather upon the character and attainments of its faculty."

-The Stanford Founding Grant

DEIR July 19, 2000 Housing and Open Space

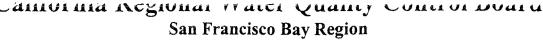
Mary Davey, Board Member Midpeninsula Citizens for Fair Housing and Director, Ward 2, Midpeninsula Regional Open Space District.

The proposed General Use Permit (GUP) proposed by Stanford for the next ten years has "significant" impacts upon the loss of open space and traffic congestion in the midpeninsula. Unless these impacts can be mitigated the County should say "no" to Stanford developing any more administrative or academic facilities, but be allowed to build the necessary housing units in the core campus to meet an existing shortfall.

"Stanford University is a private institution, and as such, is subject to normal zoning controls and project approval procedures." (p.1-1. Stanford University Community Plan/General Use Permit, Draft Environmental Impact Report, Parsons, Harland Bartholomew & Associates, Inc., Oakland, June 23, 2000)

This means the County can deny use permits to Stanford unless the County Board of Supervisors finds there are sufficient mitigation measures to ameliorate the significant impacts of development.

- All Stanford lands west of Junipero Serra should remain permanent open space. The proposed 154 acres site called Lathrop should not be the site for the Carnegie Foundation because it is beyond the Palo Alto urban services boundary.
- Necessary affordable housing for students, graduate students, post doctoral researchers, entering faculty and staff should be constructed before any other facilities are allowed. This will meet an existing housing/jobs imbalance created by Stanford in the last ten years because the University chose to build campus facilities and not housing.
- At present Stanford is implementing "no net new commute(s)". The DEIR states "...the County cannot require this of Stanford." If this exists now, why can't this be continued?



Internet Address: http://www.swrcb.ca.gov
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 - FAX (510) 622-2460



Winston H. Hickox Secretary for Environmental Protection

> Date: July 10, 2000 File No. 2188.05 (JRW)

Ms. Sarah Jones, Associate Planner Santa Clara County Planning Office 70 West Hedding Street, East Wing, 7th floor San Jose, CA 95110

Re: Stanford University Community Plan/General Use Permit, Draft Environmental Impact Report (DEIR)

Dear Ms. Jones:

We have received the above referenced draft environmental impact report (DEIR) and offer the following comments with which the Regional Board is concerned.

The proposed Community Plan identifies land use designations and development policies to guide the County in future decision-making regarding project and activities. The following developments would take place over the next ten years:

- 2,035,000 square feet of academic and support facilities;
- Up to 3,018 units of student, faculty, and staff housing;
- 2,873 additional parking spaces; and
- 2,201 additional students, faculty, and staff.
- 2-1 The proposed development would disturb more than five acres of land during construction. It must be covered under the State NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Permit). This can be accomplished by filing a Notice of Intent with the State Water Resources Control Board, Division of Water Quality. The project sponsor must propose and implement control measures that are consistent with the General Permit and with the recommendations and policies of the local agency and the RWQCB.

As proposed, without appropriate control measures, the project may have significant adverse impacts to water quality and riparian habitat. These impacts could result from the discharge of polluted runoff to waters of the State, as well as from soil erosion and decreased permeable surface area on the site. In addition, erosion may result from construction without proper control practices, especially on the site's steeper slopes.

In order to establish that the project will not have significant adverse effects on water quality and riparian habitat, the final Environmental Impact Report (EIR) should include:

- A Storm Water Pollution Prevention Plan (SWPPP) should be developed and implemented. A SWPPP is required by the General Permit. The SWPPP should be consistent with the terms of the General Permit, the Manual of Standards for Erosion & Sedimentation Control Measures by the Association of Bay Area Governments (ABAG), policies and recommendations of the local urban runoff program (city and/or county), and the Staff Recommendations of the RWQCB. Preparation of a SWPPP should be a condition of development. Implementation of the SWPPP should be enforced during the construction period via appropriate options such as citations, stop work orders, or withholding occupancy permits. The Regional Board has prepared "Directions for preparing a SWPPP," which is available from the Board at (510) 233-2304;
- Specific measures to reduce and treat runoff from developed areas of the project by
 means of vegetative buffers, grassy swales, or other means, to be effective for the life
 of the project;
- A plan for the employment of Best Management Practices (BMPs) to control sediment and erosion, both during the building process and in the long term;
- An assessment specifically addressing any potential impacts to riparian habitats. The above concerns should be addressed in such a way that the applicant will be able to show no negative impacts to habitat will result from the proposed project; and
- In the event that some impact is unavoidable in achieving the goals of the project, the final EIR should show that the negative impact resulting from the development is the smallest possible. The application should describe specific restoration that will be undertaken to offset this impact, preferably on-site.

The Regional Board is unable to offer more specific comment at this time. However, I have attached a copy of our General Comments, which discuss the Regional Board's area of responsibility, and which should help guide in the preparation of further CEQA documentation. Regional Board staff also encourage the lead agency to obtain a copy of "Start at the Source," a design guidance manual for stormwater quality protection from the Bay Area Stormwater Management Agencies Association. This manual may be obtained at most city planning offices.

If you have any questions, please call Emily Guglielmo at (510) 622-2344 or e-mail at stu26@rb2.swrcb.ca.gov.

Sincerely,

John West

Environmental Specialist Watershed Division

Enclosure



Environmental

Protection

California Regional Water Quanty Control Duard San Francisco Bay Region

Gray Da

Internet Address: http://www.swrcb.ca.gov 1515 Clay Street, Suite 1400, Oakland, California 94612 Phone (510) 622-2300 • FAX (510) 622-2460

Letter 2

General Comments

The San Francisco Regional Water Quality Control Board (Regional Board or RWQCB) is charged with the protection of the Waters of the State of California in the San Francisco Bay Region, including wetlands and stormwater quality. The Regional Board is responsible for administering the regulations established by the Federal Clean Water Act. Additionally, the California Water Code establishes broad state authority for regulation of water quality. The San Francisco Bay Basin Water Quality Control Plan (Basin Plan) explains the Regional Board's strategy for regulating water quality. The Basin Plan also describes the range of responses available to the Regional Board with regard to actions and proposed actions that degrade or potentially degrade the beneficial uses of the Waters of the State of California.

NPDES

Water quality degradation is regulated by the Federal National Pollutant Discharge Elimination System (NPDES) Program, established by the Clean Water Act, which controls and reduces pollutants to water bodies from point and nonpoint discharges. In California, the program is administered by the California Regional Water Quality Control Boards. The Regional Board issues NPDES permits for discharges to water bodies in the San Francisco Bay Area, including Municipal (area- or county-wide) Stormwater Discharge Permits.

Projects disturbing more than five acres of land during construction must be covered under the State NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (General Permit). This can be accomplished by filing a Notice of Intent with the State Water Resources Control Board. An NOI and the General Permit can be obtained from the Board at (510) 622-2300. The project sponsor must propose and implement control measures that are consistent with the General Permit and with the recommendations and policies of the local agency and the RWQCB.

Projects that include facilities with discharges of Storm Water Associated with Industrial Activity must be covered under the State NPDES General Permit for Discharges of Storm Water Associated with Industrial Activity. This may be accomplished by filing a Notice of Intent. The project sponsor must propose control measures that are consistent with this, and with recommendations and policies of the local agency and the RWQCB. In a few cases, the project sponsor may apply for (or the RWQCB may require) issuance of an individual (industry- or facility-specific) permit.

The RWQCB's Urban Runoff Management Program requires Bay Area municipalities to develop and implement storm water management plans (SWMPs). The SWMPs must include a program for implementing new development and construction site storm water quality controls. The objective of this component is to ensure that appropriate measures to control pollutants from new development are: considered during the planning phase, before construction begins; implemented during the construction phase; and maintained after construction, throughout the life of the project.

created as mitigation for the loss of existing jurisdictional wetlands or Waters of the United States cannot be used as storm water treatment controls.

In general, if a proposed project impacts wetlands or Waters of the State and the project applicant is unable to demonstrate that the project was unable to avoid adverse impacts to wetlands or Waters of the State, water quality certification will be denied. 401 Certification may also be denied based on significant adverse impacts to wetlands or other Waters of the State.

Storm Water Quality Control

Storm water is the major source of fresh water to creeks and waterways. Storm water quality is affected by a variety of land uses and the pollutants generated by these activities. Development and construction activities cause both site-specific and cumulative water quality impacts. Water quality degradation may occur during construction due to discharges of sediment, chemicals, and wastes to nearby storm drains or creeks. Water quality degradation may occur after construction is complete, due to discharges of petroleum hydrocarbons, oil, grease, and metals from vehicles, pesticides and fertilizers from landscaping, and bacteria from pets and people. Runoff may be concentrated and storm water flow increased by newly developed impervious surfaces, which will mobilize and transport pollutants deposited on these surfaces to storm drains and creeks. Changes in runoff quantity or velocity may cause erosion or siltation in streams. Cumulatively, these discharges will increase pollutant loads in creeks and wetlands within the local watershed, and ultimately in San Francisco Bay.

To assist municipalities in the Bay Area with complying with an area-wide NPDES Municipal Storm Water Permit or to develop a Baseline Urban Runoff Program (if they are not yet a co-permittee with a Municipal Storm Water Permit), the Regional Board distributed the Staff Recommendations for New and Redevelopment Control for Storm Water Programs (Recommendations) in April 1994. The Recommendations describe the Regional Board's expectations of municipalities in protecting storm water quality from impacts due to new and redevelopment projects, including establishing policies and requirements to apply to development areas and projects; initiating appropriate planning, review, approval, and inspection procedures; and using best management practices (BMPs) during construction and post-construction.

Project impacts should be minimized by developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). A SWPPP is required by the State Construction Storm Water General Permit (General Permit). The SWPPP should be consistent with the terms of the General Permit, the Manual of Standards for Erosion & Sedimentation Control Measures by the Association of Bay Area Governments (ABAG), policies and recommendations of the local urban runoff program (city and/or county), and the Recommendations of the RWQCB. SWPPPs should also be required for projects that may have impacts, but which are not required to obtain an NPDES permit. Preparation of a SWPPP should be a condition of development. Implementation of the SWPPP should be enforced during the construction period via appropriate options such as citations, stop work orders, or withholding occupancy permits.

Impacts identified should be avoided and minimized by developing and implementing the types of controls listed below. Explanations of the controls are available in the Regional Board's construction *Field Manual*, available from Friends of the San Francisco Estuary at (510) 286-0924, in BASMAA's *Start at the Source*, and in the *California Storm Water Best Management Practice Handbooks*.

California Environmental Protection Agency

Impacts and Mitigation Measures

Wetlands

Wetlands enhance water quality through such natural functions as flood and erosion control, stream bank stabilization, and filtration and purification of contaminants. Wetlands also provide critical habitats for hundreds of species of fish, birds, and other wildlife, offer open space, and provide many recreational opportunities. Water quality impacts occur in wetlands from construction of structures in waterways, dredging, filling, and altering drainage to wetlands.

The Regional Board must certify that any permit issued by the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act (covering, dredging, or filling of Waters of the United States, including wetlands) complies with state water quality standards, or waive such certification. Section 401 Water Quality Certification is necessary for all 404 Nationwide permits, reporting and non-reporting, as well as individual permits.

All projects must be evaluated for the presence of jurisdictional wetlands and other Waters of the State. Destruction of or impact to these waters should be avoided. If the proposed project impacts wetlands or other Waters of the State and the project applicant is unable to demonstrate that the project was unable to avoid those adverse impacts, water quality certification will most likely be denied. 401 Certification may also be denied based on significant adverse impacts to wetlands or other Waters of the State. In considering proposals to fill wetlands, the Regional Board has adopted the California Wetlands Conservation Policy (Executive Order W-59-93, signed August 23, 1993). The goals of the Policy include ensuring "no overall net loss and achieving a long-term net gain in the quantity, quality, and permanence of wetlands acreage and values." Under this Policy, the Regional Board also considers the potential post-construction impacts to wetlands and Waters of the State and evaluates the measures proposed to mitigate those impacts (see Storm Water Quality Control, below).

The Regional Board has adopted U.S. EPA's Clean Water Act Section 404(b)(1) "Guidelines for Specification of Disposal Sites for Dredge or Fill Material," dated December 24, 1980, in the Board's Basin Plan for determining the circumstances under which fill may be permitted.

Section 404(b)(1) Guidelines prohibit all discharges of fill material into regulated waters of the United States, unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative that will achieve the basic project purpose. For non-water dependent projects, the guidelines assume that there are less damaging alternatives, and the applicant must rebut that assumption.

The Section 404(b)(1) Guidelines sequence the order in which proposals should be approached. First, impacts to wetlands or Waters of the State must be avoided to the maximum extent practicable. Second, the remaining impacts must be minimized. Finally, the remaining unavoidable adverse impacts to wetlands or Waters of the State must be mitigated. Mitigation will be preferably in-kind and on-site, with no net destruction of habitat value. A proportionately greater amount of mitigation is required for projects that are out-of-kind and/or off-site. Mitigation will preferably be completed prior to, or at least simultaneous to, the filling or other loss of existing wetlands.

Successful mitigation projects are complex tasks and difficult to achieve. This issue will be strongly considered during agency review of any proposed wetland fill. Wetland features or ponds

Site Planning

The project should minimize impacts from project development by incorporating appropriate site planning concepts. This should be accomplished by designing and proposing site planning options as early in the project planning phases as possible. Appropriate site planning concepts to include, but are not limited to the following:

- Phase construction to limit areas and periods of impact.
- Minimize directly connected impervious areas.
- Preserve natural topography, existing drainage courses and existing vegetation.
- Locate construction and structures as far as possible from streams, wetlands, drainage areas, etc.
- Provide undeveloped, vegetated buffer zones between development and streams, wetlands, drainage areas, etc.
- Reduce paved area through cluster development, narrower streets, use of porous pavement and/or retaining natural surfaces.
- Minimize the use of gutters and curbs which concentrate and direct runoff to impermeable surfaces.
- Use existing vegetation and create new vegetated areas to promote infiltration.
- Design and lay out communities to reduce reliance on cars.
- Include green areas for people to walk their pets, thereby reducing build-up of bacteria, worms, viruses, nutrients, etc. in impermeable areas, or institute ordinances requiring owners to collect pets' excrement.
- Incorporate low-maintenance landscaping.
- Design and lay out streets and storm drain systems to facilitate easy maintenance and cleaning.
- Consider the need for runoff collection and treatment systems.
- Label storm drains to discourage dumping of pollutants into them

Erosion

The project should minimize erosion and control sediment during and after construction. This should be done by developing and implementing an erosion control plan, or equivalent plan. This plan should be included in the SWPPP. The plan should specify all control measures that will be used or which are anticipated to be used, including, but not limited to, the following:

- Limit access routes and stabilize access points.
- Stabilize denuded areas as soon as possible with seeding, mulching, or other effective methods.
- Protect adjacent properties with vegetative buffer strips, sediment barriers, or other effective methods.
- Delineate clearing limits, easements, setbacks, sensitive areas, vegetation and drainage courses by marking them in the field.
- Stabilize and prevent erosion from temporary conveyance channels and outlets.
- Use sediment controls and filtration to remove sediment from water generated by dewatering or collected on-site during construction. For large sites, stormwater settling basins will often be necessary.

Chemical and Waste Management

The project should minimize impacts from chemicals and wastes used or generated during construction. This should be done by developing and implementing a plan or set of control measures. The plan or control measures should be included in the SWPPP. The plan should specify all control measures that will be used or which are anticipated to be used, including, but not limited to, the following:

- Designate specific areas of the site, away from streams or storm drain inlets, for storage, preparation, and disposal of building materials, chemical products, and wastes.
- Store stockpiled materials and wastes under a roof or plastic sheeting.
- Store containers of paint, chemicals, solvents, and other hazardous materials stored in containers under cover during rainy periods.
- Berm around storage areas to prevent contact with runoff.
- Cover open Dumpsters securely with plastic sheeting, a tarp, or other cover during rainy periods.
- Designate specific areas of the site, away from streams or storm drain inlets, for auto and equipment parking and for routine vehicle and equipment maintenance.
- Routinely maintain all vehicles and heavy equipment to avoid leaks.
- Perform major maintenance, repair, and vehicle and equipment washing off-site, or in designated and controlled areas on-site.
- Collect used motor oil, radiator coolant or other fluids with drip pans or drop cloths.
- Store and label spent fluids carefully prior to recycling or proper disposal.
- Sweep up spilled dry materials (cement, mortar, fertilizers, etc.) immediately--do not use water to wash them away.
- Clean up liquid spills on paved or impermeable surfaces using "dry" cleanup methods (e.g., absorbent materials, cat litter, rags) and dispose of cleanup materials properly.
- Clean up spills on dirt areas by digging up and properly disposing of the soil.
- Keep paint removal wastes, fresh concrete, cement mortars, cleared vegetation, and demolition wastes out of gutters, streams, and storm drains by using proper containment and disposal.

Post-Construction

The project should minimize impacts from pollutants that may be generated by the project following construction, when the project is complete and occupied or in operation. These pollutants may include: sediment, bacteria, metals, solvents, oil, grease, and pesticides, all of which are typically generated during the life of a residential, commercial, or industrial project after construction has ceased. This should be done by developing and implementing a plan and set of control measures. The plan or control measures should be included in the SWPPP.

The plan should specify all control measures that will be used or which are anticipated to be used, including, but not limited to, the source controls and treatment controls listed in the Recommendations. Appropriate control measures are discussed in the Recommendations, in:

- Table 2: Summary of residential post-construction BMP selection
- Table 3: Summary of industrial post-construction BMP selection
- Table 4: Summary of commercial post-construction BMP selection

Additional sources of information that should be consulted for BMP selection include the California Storm Water Best Management Practice Handbooks; the Bay Area Preamble to the California Storm Water Best Management Practice Handbooks and New Development Recommendations; the BASMAA New Development Subcommittee meetings, minutes, and distributed information; and Regional Board staff. Regional Board staff also have fact sheets and other information available for a variety of structural stormwater treatment controls, such as grassy swales, porous pavement and extended detention ponds.

California Environmental Protection Agency

From: Karen White <kvwhite@nanospace.com>

Reply-To: "kvwhite@nanospace.com" <kvwhite@nanospace.com>

Date: Tue, 18 Jul 2000 22:40:33 -0700

To: "'Santa Clara County Planning

Commission'"
Sarbara.laskin@pln.CO.Santa-Clara.CA.US>, "'Honorable City

Council' "<city_council@city.palo-alto.ca.us>

Cc: "'Joe Simitian'" <joe.simitian@bos.CO.Santa-Clara.CA.US>

Subject: Stanford DEIR/Need for Reduction in Scope and Substantial

Mitigation

Honorable Planning Commission and Honorable City Council:

3-1 Stanford proposes a vast development scheme which would create overwhelming pressures on Palo Alto's schools, streets, community centers, parks, and on City services which even now are badly stretched. For Stanford in its DEIR to assert as "insignificant" the negative impacts of its proposed development on all of Palo Alto's community services is disingenuous and must be challenged. Stanford's reported "need" for millions of square feet of additional development would create massive pressures on all of Palo Alto, the foothills and beyond. Further, the DEIR fails to address the cumulative impacts of Stanford's plan on neighboring communities.

What are Palo Alto's needs? We need land and funding for a third middle school; land for community centers, potentially including a relocated JCC; expanded libraries to meet current and future demand; housing for teachers and public safety employees; land for neighborhood parks; space for a non-profit center, and relief from the crush of traffic which today clogs our streets and will worsen exponentially under the Stanford plan.

Reflecting the extraordinary pressures on Palo Alto which would accompany any further university development, the proposed expansion should be sharply cut. Further, mitigations including but not limited to the following should be required:

- 3-2 1. Stanford land for Palo Alto schools and school administration use; and, in addition,
 - 2. A minimum of \$20 million in Stanford funds for City use, to permit the City either to purchase or acquire through eminent domain all or a portion of the Elks/Hyatt Rickey's land for a number of uses, incorporating many of the community needs identified above, or to acquire an alternate site in south Palo Alto for these uses.

Palo Altans will soon be asked to support a bond measure to finance costly improvements to City facilities which are also used by the Stanford community. As we mark our ballots, we will reflect on the quality of leadership our elected officials have shown in holding the university fully accountable for its impacts on our City, and in insisting that Stanford address Palo Alto's needs, not just its own.

Sincerely,

Karen White 146 Walter Hays Drive Palo Alto, CA 94303



Rick Stultz <rjstultz@altavis ta.net>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Stanford's plans to build housing on the golf course

07/18/00 10:03 PM Please respond to rjstultz

To the Board of Supervisors:

4-1 I am strongly opposed to any plan to build housing on the historic Stanford Golf Course. Relocating one or more holes, as Stanford proposes, would ruin the integrity of the course. It would make much more sense for Stanford to build housing on the site that they would relocated the hole(s) too.

Please also consider encouraging Stanford to build more densely on the lands that make sense for housing. It's time for compact development.

Sincerely,

Richard Stultz
Palo Alto resident



winmail.dat



Rick Stultz <rjstultz@altavis ta.net>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Stanford University's Plan to build housing on the Stanford Golf

Course

07/18/00 08:28 PM Please respond to rjstultz

I am forwarding this message on Behalf Of Scott McNealy:

----Original Message----

From: scott@eng.sun.com [mailto:scott@eng.sun.com]On Behalf Of Scott

McNealy

Sent: Tuesday, July 18, 2000 7:30 AM

To: rjstultz@altavista.net

Subject: Re: Action Item for this Wednesday

I wont be able to make this as I have a business dinner but if it helps, you can print this email as acknowledgement that I am in total agreement with the following:

- 5-1 1. The Stanford Golf Course is a area-wide recreational resource in an area with too few golf courses; moreover, it is a world-famous, championship golf course, the work of the great golf architect George Thomas;
 - 2. It has Open Space and environmental protection values;
- 5-2 3. That elimination of the first hole-the University's "modest proposal"--would effectively cripple the golf course, and Stanford has no realistic plans to replace the hole; You can't separate the Clubhouse from the first hole by a quarter mile.
 - 4. You have only heard about this recently, and are very concerned about it;
 - 5. You want the City to go on record against any plans that would remove the First Hole or any other portions of the Golf Course.
- 5-3 6. The City should encourage Stanford to increase the density of it's housing to accommodate more people on less land.

Scott McNealy Stanford grad Palo Alto resident Golf course member CEO of Sun Microsystems, Palo Alto, CA.



Allan Abbott <aabbott@microdi splay.com>

To: city_council@city.palo-alto.ca.us, sarah.jones@pln.CO.Santa-Clara.CA.US

CC:

07/19/00 12:35 PM

Subject: Stanford golf course

Ladies and gentlemen,

I could go on for several pages, but I'll keep this brief. My name is Allan Abbott, and I'm a Stanford graduate and a member of the Stanford Golf Club. I have just learned of Stanford's proposal to erect student housing on land currently comprising several of the first nine holes of the Stanford golf course. I urge you to advise Stanford to choose an alternate location for what is no doubt a necessary increase in housing units.

- 6-1 My reasons are simple: (a) the golf course is as much an icon of the University as Hoover Tower or Stanford Stadium and mustn't be dismembered. (b) there is nearby acreage that is just as suitable for expanded housing (off Palm Drive or, if you stretch your imagination,
- 6-2 even the Lagunita lake bed). (c) the golf course is not only economically self-sufficient . . . it contributes revenue to support other athletic endeavors. If the course is butchered as proposed, I guarantee that membership will plummet and the course will spill red ink all over the Athletic Department's budget.

I know that some of these issues bear more on the University than the City Council, but maybe you can get the geniuses who conceived this plan to reconsider before they trash a long-standing asset of the Palo Alto area. Thank you for your consideration.

Allan Abbott (408) 393-9515



John Barksdale <jrbarksdale@yah
oo.com>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Stanford REIR

07/19/00 05:16 PM

19 July, 2000

Ms. Sarah Jones
Department of Planning and Community Environment
250 Hamilton Avenue
Palo Alto, CA 94303

Subject:

Stanford University REIR

Dear Ms. Jones:

7-1 Regardless what one's definition of open space happens to be, whether it be highly developed and intensely used, or at the other extreme, very sensitive and not to be touched by human feet, we must realize that there is a wide range of open space required by all residents of any given community.

If Stanford were to replace the Stanford Golf Course with buildings and parking lots, there would be tremendous pressure to replace it in the foothills. If they are successful, they have reduced one type of open space while maintaining another. If they are unable to replace the golf course, then they have eliminated a much-needed form of open space while maintaining the other. In both scenarios, there has been a net loss of open space, which this bay area community cannot afford to lose.

Surely there is a better alternative than destroying that Stanford Golf Course.

Very truly yours,

John R. Barksdale Stanford Class of 1966

Do You Yahoo!?

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http://mail.yahoo.com/



"Robert J.
Polito"
<BPolito@buckles
-smith.com>

To: city_council@city.palo-alto.ca.us, sarah.jones@pin.CO.Santa-Clara.CA.US

cc:

Subject: Stanford Golf Course/Development Plans

07/19/00 02:27 PM

- 8-1 I encourage you to oppose any development plans that Stanford University has that threaten the Stanford Golf Course and the surrounding open space. It's already obvious that the 1000+ "homes" being built on Sand Hill Road will create havoc on the already overcrowded streets in the area. I can only assume the environmental impact study for that project was done on Christmas day. Any further high density development that near Sand Hill will be disastrous, not to mention the inconceivable
- 6-2 folly of destroying ar even altering the course, a historic jewel unmatched in the collegiate golf community and among the best courses in the country. The course provides beauty and enjoyment for the local community, golfer and non-golfer, as well as a valuable haven for local wildlife in an area where open space of this quality has become almost impossible to find.
- 8-3 As a constructive alternative suggestion, I would think the barren open space west of Foothill but nearer Page Mill would be a suitable location for additional development. This would spread the traffic congestion over a larger area, and their is plenty of room for the necessary improvements. The construction could (and should) be limited to a few hundred feet from the road, or at least to the lower east facing slopes, the balance being left as open space.

This is only one of many alternatives that must be exhaustively explored before any thought is given to modifying the beautiful and pristine area encompassing the Stanford Golf Course.

Sincerely,

Bob Polito Local resident since 1972 650-326-7300



Mike McTeigue <mcteigue@pacbel

l.net>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

Subject: regarding stanford golf course

07/19/00 09:45 AM Please respond to mcteigue

As a PGA golfer for many years and a alumnus of Stanford's Graduate School of Business, I am upset to learn of plans to destroy its historic championship golf course. It is a jewel in the crown of Stanford which cannot be replicated or replaced. Please use your influence to persuade the University to solve its housing problems without changing the beloved golf course with a national reputation.

Thank you.

Michael McTeigue

Michael McTeigue

1544 Cherrywood Drive San Mateo, CA 94403 650-573-1805 650-573-6564 fax



"JPBrock-Utne" <brookutne@ispch annel.com>

To: <city.council@city.palo-alto.ca.us>

cc: <sarah.jones@pln.CO.Santa-Clara.CA.US>

Subject: Stanford Golf Course

07/19/00 07:20 AM

John and Sue Brock-Utne, would like to let you know how horrified we are to learn that Stanford is considering breaking up the golf course. Surely there must be other land in the area for housing!

Recently we were walking on the golf course in the early morning and noticing the birds and animals that live on that little oasis. It has become a sanctuary for wild life and it would be a terrible thing to put houses there. It is also one of the great courses of California, if not America. Once this is broken up, it is gone forever. How sad it would be to lose such an historic course! We do not understand how this could be contemplated and will do all in our power to prevent it happening. John and Sue Brock-Utne.

To: Palo Alto Council and Planning Commission

From: Nonette Hanko

Subject: Draft E. I.R. for Stanford Community Plan

Dear Members of the Council and Commission:

Following are four points I wish to raise concerning the Santa Clara County Draft E.I.R.

11-1 l.) Figure 4.1-2 is a map which depicts the Coyote Hill area. This map should be revised to show the actual catagory boundaries. Please compare the Palo Alto Comprehensive Plan map (see attachment) which shows the continuation of the Research Park across Foothill Expressway and continuing westerly along Arastradero Rd. The lands which should be shown in Figure 4.1-2 as Coyote Hill are Coyote Hill itself and adjacent undeveloped lands separated from the Research Park by the City's Urban Growth Boundary. These undeveloped lands which are under the city's jurisdiction are zoned Agricultural Conservation (A-C) which permits the grazing of horses and related uses.

In relationship to this, pages 4.1-5 and 6 of the E.I.R. text catagorize Stanford Lands in City of Palo Alto; listing Medical Center, Shopping Center, and Research Park but not Coyote Hill. It would seem appropriate for the text to match the map. Also appropriate, since these lands are in Palo Alto's jurisdiction, for the City's Planning Department to suggest wording for the text of the Coyote Hill catagory; and to recommend that the city's adopted Urban Growth Boundary as it pertains to Stanford lands be shown as extending from Deer Creek and Foothill Expressway to Arastradero Rd. (see attached map).

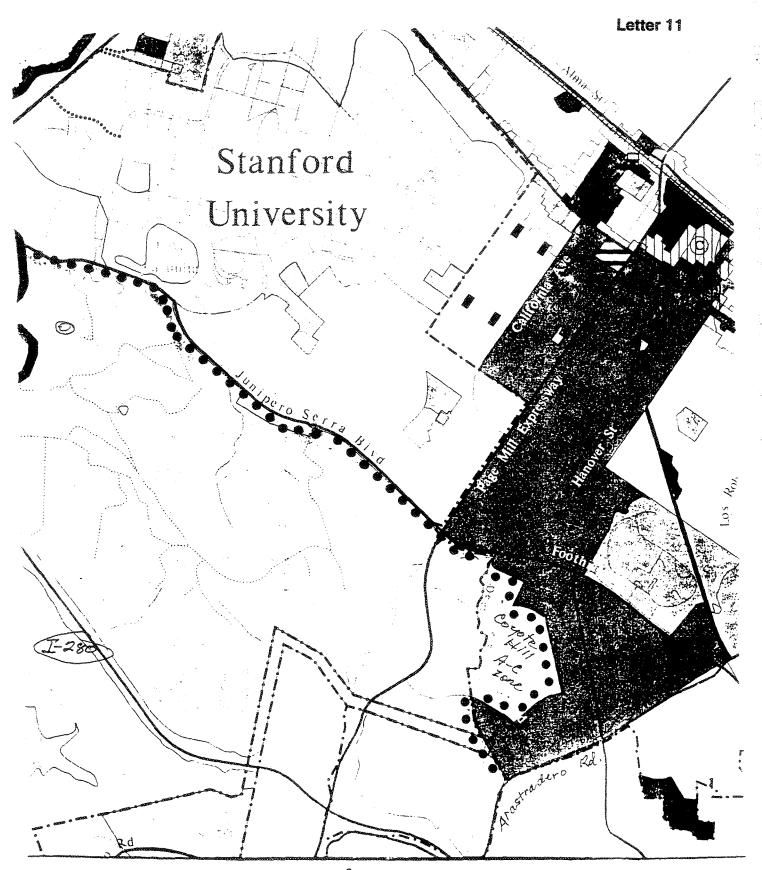
- 2.) Palo Alto 's Agricultural Conservation Zone District (A-C) adopted by the City in 1973 for the Coyote Hill undeveloped lands would be a good starting point for discussions with the County on proposed zoning for all Stanford lands in Palo Alto's sphere. It ought to include existing agricultural uses and a definition of Field Study, and should be applied to foothill lands.
- 11-2 3.) Since thr E.I.R. points to amendments to the three-party interjuris-dictional agreement, I wish to strongly recommend that there be no permit exemption for projects of 5,000 gsf and less. Even four separate projects if located close together or on ridge tops or other scenic locations could completely destroy the beauty we are all interested in preserving. No exemptions should be permitted.

11-3 4.) Finally, I would like to see the Stanford Community Plan considered as a cluster development project; with the Core Campus considered as the permitted development (whichever Alternate is chosen), and the Stanford foothills as the mitigation required for the Core Development.

Good Luck,

Nonette Hanko

Jonette Hanko



Urban Growth Boundary: Palo Atto Comprehensive Plans Coupte Hill and undeveloped lands in Palo Alto's jurisdiction and Agricultural Conservation District A-C)

Letter 12

County of Santa Clara

Environmental Resources Agency

Integrated Waste Management Program (408) 441-1198 Pollution Prevention Program (408) 441-1195 1735 North First Street, Suite 275 San Jose, California 95112 EAX (408) 441-0365



July 19, 2000

TO:

Sarah Jones

Santa Clara County Planning Office

FROM:

Julie Taylor (

Integrated Waste Management Program

SUBJECT:

Proposed Stanford University Community Plan/General Use

Permit: DEIR: Scope and Content

The scope and content of environmental information related to the Integrated Waste Management Program included in the Draft EIR is as follows:

- 12 -1 Provisions must be made for the collection of recyclables and garbage on a regular basis, as required by County ordinance. Additionally, Public Resources Code Sections 42910 and 42911 established a model ordinance (attached) relating to areas for collecting and loading recyclable materials in development projects. The ordinance was adopted by the California Integrated Waste Management Board on March 31, 1993. This ordinance became effective and enforceable in Santa Clara County on September 1, 1993. The ordinance requires that any new development project for which an application for a building permit is submitted on or after September 1, 1993 shall include adequate, accessible, and convenient areas for collecting and loading recyclable materials.
 - What sustainable or "green building" design practices can be utilized during the design phase that will minimize the ultimate consumption of energy, water, fossil fuels, and other natural resources by this project?
 - How can landscaping plans be designed to provide natural shade for buildings and patrons on hot days, minimize building cooling costs, and add natural beauty to outdoor areas?
 - What can be incorporated into the project to aid recycling and yard waste collection once the project is completed? Recycling receptacles should be placed in convenient locations for the general public, employees, and students.
 - 5. Can building products/equipment made with recycled content be used in remodeling and new construction? Seating, decks, walkways, and recycling

containers made with recycled plastic content are available. Rubberized Asphalt Concrete can be used for parking lots, walkways, and other paved surfaces.

- 6. How can solid waste generation be minimized during the demolition, remodeling, and construction phases of the project? Building materials should be salvaged during demolition for reuse or recycling. Concrete, asphalt, and other building materials are recyclable at locations throughout Santa Clara County. What provisions will be made to reuse and recycle these materials?
- 12-2 7. The DEIR notes that traffic impacts are a significant concern. One option for reducing the negative impact on air quality would be the use of low or zero emission vehicles where possible for site services, such as for garbage and recyclable material collection vehicles.
- 12 -3 8. The DEIR highlights the need to exercise caution in jeopardizing the habitats of endangered species. Peninsula Sanitary Service, Inc. staff, general contractors, and sub-contractors should be aware that disposal and recycling containers should be situated in such a manner that would discourage animals from entering them and becoming trapped.

Thank you for the opportunity to review the DEIR. Please forward a copy of the final EIR for program staff to review. If you have any comments or questions, please contact me at 441-1198 ext. 4403.

§ 42905

WASTE MANAGEMENT

Div. 30

Article 2 **DEFINITIONS**

Section

42905. Development project.

Article 2 was added by Stats. 1991, c. 342 (A.B. 1327), § 4.

§ 42905. Development project

As used in this chapter, "development project" means any of the following:

- (a) A project for which a building permit will be required for a commercial, industrial, or institutional building, marina, or residential building having five or more living units, where solid waste is collected and loaded and any residential project where solid waste is collected and loaded in a location serving five or more units.
- (b) Any new public facility where solid waste is collected and loaded and any improvements for areas of a public facility used for collecting and loading solid waste.

(Added by Stats. 1991, c. 842 (A.B. 1327), § 4.)

Article 3 **ORDINANCES**

Section

42910. Model ordinance; hearing; adoption; consultation.

42911. Adoption of ordinance by local agencies; effect of model ordinance.

Article 3 was added by Stats. 1991, c. 842 (A.B. 1327), § 4.

§ 42910. Model ordinance: hearing; adoption; consultation

- (a) Not later than March 1, 1993, after holding a public hearing, the board shall adopt a model ordinance for adoption by any local agency relating to adequate areas for collecting and loading recyclable materials in development, projects.
- (b) The board shall consult with representatives of the League of California Cities, County Supervisors Association of California, American Planning Association ation, American Institute of Architects, private and public waste services building construction and management, and retail businesses in developing the model ordinance.
- (c) Not later than January 1, 1993, the board shall distribute the draft mode ordinance to all local agencies and other interested parties for review. An comments shall be submitted to the board by February 1, 1993, for consider ation at the public hearing of the board to adopt the ordinance.

(Added by Stats. 1991, c. 342 (A.B.1327), § 4.)

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ERSKINE & TULLEY A PROFESSIONAL CORPORATION

220 SANSOME STREET, SUITE 600 SAN FRANCISCO, CALIFORNIA 94104 PHONE: (415) 392-5431 FAX: (415) 392-1978 MORSE ERSKINE (1895-1968)
J. BENTON TULLEY (1908-1974)

Palo Alto City Council City Hall 250 Hamilton Ave. Palo Alto, CA. COUNCIL MEETING 7-19-00

X Recd at Mtg

Re: Stanford Golf Course
Draft Environmental Impact Report, re:
Stanford Draft Community Plan and
General Use Permit Application

Dear City Council,

I am a resident of San Francisco, but a Palo Altan-in-law. My parents-in-law Dick and Jeanne Abbott reside at 560 Melville St., across the street from St. Anne's Church, and I spend a lot of family time here. I am a 1969 graduate of Stanford University, and I lived on Forest St. and Bryant St. in downtown Palo Alto for two years when I was a student.

As a past captain of the Stanford Golf Team and a long-time friend of Palo Alto and Stanford University, I write to express my concern about the University's development plans, which threaten the historic Stanford Golf Course.

The University's Draft Community Plan and General Use Permit Application, submitted together to the County of Santa Clara in November, 1999, make clear the University's intention to build faculty, staff, and student housing on lands now occupied by the Golf Course. While I understand the need for new housing, the Golf Course is not the right place: the University owns hundreds of acres that are better suited to urban development than the Golf Course.

I believe that the University has embarked upon a great mistake because its land use planners and developers apparently under-appreciate the artistic, historic, and environmental significance of the Golf Course, its stature in the world of golf, and its great value to the University. I write for the purpose of explaining this significance and value to you.

The Stanford Golf Course is one of the great treasures of Stanford University and the Palo Alto area. It is a jewel of many facets which simultaneously serves functions of open space, landscape design, environmental protection, general recreation, and athletic competition. It serves not only Stanford University, but Palo Alto, the mid-Peninsula area, Northern California, and the world of golf.

Palo Alto City Council July 19, 2000 Page 2

As a work of historically significant landscape architecture, the Stanford Golf Course compares favorably to Frederick Law Olmsted's Palm Drive and Oval. Built in 1929, the Golf Course was the final design work of George C. Thomas, one of the greatest figures from America's Golden Age of golf architecture, and the author of the leading treatise, "Golf Course Architecture in America". At Stanford, Thomas and his collaborator William P. "Billy" Bell created one of the very finest university golf courses in the world--a masterpiece of classic design, strategic challenge, and surpassing beauty.

The Golf Course has attracted several of golf's greatest champions to Stanford, Palo Alto, and Northern California, including Tiger Woods, Tom Watson, Lawson Little, and the greatest woman golfer in history Mickey Wright. Generations of other Stanford golfers have become leaders in the golf world as authors, commentators, designers, and businesspersons. Stanford alumni include United States Golf Association past presidents Sandy Tatum and Grant Spaeth, and two members of its current governing board, Walter Driver and Peter James. As a result, Stanford University is widely known as one of the golf world's most significant resources.

- The Golf Course annually provides recreation and competition to 70,000 or more of Stanford's students, faculty, staff, alumni, friends, and the public. Of these 70,000 rounds, approximately 18,000--fully one-quarter--are played by the public, including thousands of Palo Altans annually. It has hosted seven national championship tournaments (men's or women's national collegiate championships in 1946, 1960, 1966, 1981, 1982, and 1989, and the U.S.G.A. Boys' Junior Championships in 1959), while being readily playable by novices.
- On another level, the Golf Course is an environmental haven, a transitional ecosystem between Stanford's urban core and its wild foothills. The wide expanses of old growth oak forest, riparian forest, native grasslands, and the mile or more of San Francisquito Creek, comprise well more than half of Golf Course acreage, and provide habitat for numerous migratory bird populations, the endangered California Tiger Salamander, and other rare and endangered species of plants and animals. The University's Golf Course development plans would sacrifice this.

As I read the Stanford Draft Community Plan and General Use Permit Application, submitted to the County of Santa Clara on November 15, 1999, I see the University asking the County's permission for several things which threaten the Golf Course:

(1) an "Academic Campus" zoning designation for all of the Golf Course lands, both to the east and west of Junipero Palo Alto City Council July 19, 2000 Page 3

Serra Boulevard, which would allow the full range of academic-related construction, including but not limited to housing;

- (2) a permit to allow immediate construction of between 304 and 570 units of medium-density faculty/staff housing on land now occupied by the First Hole of the Golf Course; and
- (3) County approval of the University's plan to "aggressively pursue" additional housing construction on unspecified areas of the first seven holes of the Golf Course and its practice facilities, including but not limited to as many as 1,000 units of student housing.

The Golf Course appears to be the only significant piece of Stanford land, and the only land lying in the foothills to the west of Junipero Serra, which the University is attempting to remove from Open Space. I believe that the current "Open Space" land use designation is better suited to the Golf Course—which has been in Open Space since it was built in 1929—than the "Academic Campus" designation now sought by the University, which would enable the University to build not only housing, but the full range of academic buildings on the property.

I could not find in the University's submittals to the County any reference to specific plans, or any request for County permission, to replace any portions of the Golf Course that would be lost to "academic campus" development. The zoning designations requested by the University in the Draft Community Plan do not appear to provide for sufficient usable land adjacent to the Golf Course to replace lost holes. The environmental impacts of building new holes would be substantial, and could be completely avoided by leaving the current golf course where it is.

The University's stated intention to urbanize the Golf Course does not square with the University's overriding commitment, stated elsewhere in the Draft Community Plan, to follow principles of "compact urban development." Infill and redevelopment of those already highly-urbanized areas of the central campus would seem preferable to encroachment upon the already well-utilized Open Space provided by the Golf Course and its practice facilities.

Golfers are not the only ones who are opposed to new construction on the Golf Course. The crowding and accompanying traffic problems at the already-overburdened Alpine Road/Junipero Serra/Sand Hill Road intersections, the loss of open space, the environmental destruction, the loss of a regional recreational resource, and the loss of Stanford and Palo Alto heritage

Palo Alto City Council July 19, 2000 Page 4

resources will alarm large numbers of the University community and its alumni, friends, and neighbors.

Particularly in these times of increased urban pressures on all of us, it is of extreme importance to our quality of life to protect and preserve our historic open spaces. The Stanford Golf Course is a shrine and a haven not only for golfers, but for all of its surrounding communities, including Palo Alto. For these reasons, I urge the City of Palo Alto to oppose Stanford's propsal to build on the historic Stanford Golf Course. The University must be encouraged to build up--not out. Continued low-rise urban sprawl over these precious Open Space lands should be opposed by all.

Very truly yours,

Richard H. Harris, Jr.

Pria Graves
College Terrace
Residents' Association
2130 Yale Street
Palo Alto, CA 94306

24 July, 2000

Ms. Sarah Jones
Planning Office, County of Santa Clara
70 West Hedding Street
San Jose, CA 95110

Re: Stanford University Draft Community Plan and General Use Permit Application, Draft Environmental Impact Report

Dear Ms. Jones:

A significant portion of the development proposed under the Stanford General Use Permit submitted in November 1999, occurs on the borders of the College Terrace neighborhood. Our experience over the last decade indicates that many of the impacts of development done under the 1989 GUP, particularly with respect to traffic, were not adequately predicted or mitigated. We are very concerned that the same pattern will repeat itself.

Even if Stanford succeeds with the laudable goal of "no new net commute trips", the addition of such a large number of additional residents nearby will have a huge impact on area traffic. Other serious impacts include loss of our open space buffer and the wildlife it harbors, the added runoff and risk of flooding generated by the large addition of impervious surfaces, and the effects of such a massive construction project in close proximity to us.

For these reasons we believe that the impacts to our neighborhood must be addressed in greater detail. Measures such as a traffic calming program which will be needed to mitigate anticipated impacts must be initiated immediately. In addition, specific thresholds should be established and monitored for key indicators including traffic and noise and additional mitigation steps invoked if these thresholds are exceeded.

We also believe that it is important to note that the types of uses prevalent in the Research Park are not accurately characterized in the DEIR. The mix has changed over the last few years. Bordering our neighborhood along California Avenue, the largest tenant is a patent law firm, Wilson Sonsini Goodrich and Rosati. Several other tenants are accounting and financial institutions. Though this area is not immediately under consideration in this EIR, it is important that the context of the area be correctly portrayed. The supposed link between the "research" park and Stanford has little validity when the tenants are patent lawyers.

Our comments fall into two parts: general comments on several high level areas and comments that address specific impacts covered by the DEIR.

General Comments:

Housing:

14 -3 We share the City's concern that as many as 1150 units of housing (one third of the total) are slated to be constructed adjoining our neighborhood. While we believe that additional housing is needed, this plan will impose a disproportionate share of the impact on one small portion of Palo Alto. Specific mitigations are needed to protect quality of life in our neighborhood if this level of development is to be allowed. The thrust of these mitigations are discussed under Circulation and Parking.

Schools:

14 -4 We echo the City's concern that school mitigation fees will not adequately address the actual impacts to our schools. Although we understand that by law such fees are the only mitigation which may be imposed, we do not believe that payment of these fees reduces the impact to "Less than Significant". A more suitable designation would be "Significant but Unavoidable".

Circulation and Parking:

14-5 We strongly support the City's recommendation that Stanford should prepare an integrated transportation plan. Piecemeal solutions to large scale problems are seldom successful. The City is correct that various traffic mitigation measures need to be placed into a more comprehensive context. Stanford lands, including the core campus, Medical Center, Research Park, and Shopping Center, should be considered, and the plan should emphasize transit, transportation demand management, alternate forms of transit, and traffic-calming.

We wish to strongly support the City's desire to include effects on pedestrians and bicycles when evaluating intersection widenings. Such widenings tend to have a negative effect on modes of transport other than cars, encouraging even greater car use to avoid such unsafe experiences. We also are very much in favor of the 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.

We agree with the City's comments on the additional analysis needed in the area of trip generation and support the idea that Stanford Research Park should be included in the trip reduction area. The cumulative impact of development on all Stanford owned lands should be evaluated and mitigated.

We also agree with the City that a "no net new commute trips" policy is of the utmost importance. In fact, we would like to see compliance with this policy demonstrated annually as a condition of any further development approvals. However, there is an underlying assumption that the "no net new commute trips" has been successful over the life of the previous GUP. In fact, many new trips have been generated, but they are terminating (and parking) in our neighborhood instead of on campus! It appears that the only true way to ensure that this policy is adhered to is to implement residential permit parking in adjoining neighborhoods such as College Terrace and Evergreen Park. Stanford should fund such a program as part of the mitigation package for this GUP.

We are pleased that Palo Alto staff supports the idea of traffic calming mitigation measures. We are very concerned that the EIR contains mainly "feel good" language about Stanford's responsibility in this area. Stanford must be held responsible for funding appropriate surveys to determine what portion of the cut-through traffic is related to Stanford lands. We have data from a 1999 study done by Fehr and Peers which indicates that an extraordinary 50 - 70% of peak hour traffic on some of the interior streets in our neighborhood is non-local. Specific mitigations such as funding for neighborhood traffic calming studies and for implementation of calming measures should be required immediately. Additional funding for other TDM measures (such as shuttles) should be triggered if any increase in cut-through traffic is detected. Cut-through traffic should also be considered to include vehicles driven into our neighborhood and parked by persons using other means of transportation to complete their trips to Stanford lands.

We also feel that the models used to project the increased traffic and its effects are missing a key component. They focus on intersection operation and delays. The apparent assumption is that the major concern concerning traffic is commute peak delays. As residents, however, we are more concerned about the speed and volume of cars passing through our neighborhoods at all hours. For this reason, we would suggest that an additional analysis tool be included in the EIR, the Traffic Infusion on Residential Environment (T.I.R.E.) rating.

The T.I.R.E. index methodology was developed at UC Berkeley by D.K. Goodrich to measure the environmental capacity of residential streets. It provides a more appropriate measurement than physical capacity for determination of quality of life impacts from traffic. Environmental capacity is a measure of the livability of a street and includes such factors as: speed, ability to back out of driveways, noise, perception of safety for pedestrians and bicyclists. The T.I.R.E. index is a theoretical numerical representation of a resident's perception of traffic on their everyday activities and is based on the total daily traffic volume. This would more accurately reflect the huge impact on quality of life resulting from Stanford-generated traffic increases.

Finally, we are concerned that the existing traffic volumes and speeds on Stanford Avenue and El Camino Real will discourage the residents of these new units from using alternatives such as walking or biking for non-commute needs. While the units will be located in close proximity to stores, a library, and other such services, the 9600 cars whizzing down Stanford Avenue (85th percentile speed of 35 mph) make crossing on foot or by bike a frightening prospect. We believe that to encourage these folks to adopt a non-motor vehicle lifestyle, Stanford Avenue must be pedestrianized: traffic must be slowed, safe crossings added, and a pedestrian right-of-way developed on the north side of the street. We believe significant financial assistance from Stanford in support of this goal should be made part of the mitigation package to protect our neighborhood.

This concludes our general comments on the DEIR as a whole. The remainder of this document presents comments on specific impacts discussed in the DEIR.

Specific comments:

OS-5: Will the project cause an adverse effect on foreground views from one or more private residences or significantly alter public views?

This impact is analyzed as "Less than Significant", assuming that because College Terrace is densely developed, the loss of the open land buffer across Stanford Avenue is insignificant. This interpretation is incorrect. Housing development along Stanford Avenue could cause an adverse effect on foreground views depending on the design and density of the proposed housing. The design, density and location of the housing developments have not been identified at this time. The level of visual contrast may change, depending on the form, texture and color of the new structures and the setback distances from the roadway. Degradation of a specific scenic resource (modified oak woodland along Stanford Avenue) may occur because views of natural open space lands would be replaced with urban housing development. The fact of having dense development behind one's property does not alter the fact that the transformation from modified oak woodland to dense housing across the street is a potentially significant impact.

This is a Significant impact and proper mitigations should be included. Protection for mature trees and an adequate design review process for the proposed housing units should be included among the mitigations.

TR-3: Parking. Will the project create adverse impacts to existing parking or access to existing parking?

14 -7 This impact is analyzed as "Less than Significant" but suggests that a neighborhood monitoring program may be needed. In fact, the impact from development done under the 1989 GUP is already reaching the "Significant" point in the College Terrace neighborhood and is expected to increase sharply this year when freshmen's cars are banished.

We would like to particularly point out that the East Campus development (adjoining College Terrace) proposes up to 1150 new housing units but only 564 new parking spaces. Unless protection is offered to our neighborhood, we anticipate that this alone will result in several

hundred new cars seeking spaces on our streets. In addition, we already observe people choosing to commute by driving to our neighborhood and taking the Marguerite to complete the trip. We anticipate that this effect will increase as more core campus development occurs under the new GUP.

This is a Significant impact under measure b (increased demand for on-street parking) and proper mitigations must be included. We would like to suggest that Stanford should supply funds to implement a residential permit parking scheme in adjoining neighborhoods as an appropriate mitigation. In addition, future parking-related policy changes by Stanford, such as the ban on freshman parking, should not be allowed without first performing appropriate studies to determine the impacts on adjacent neighborhoods; impacts must be mitigated before such policies are adopted.

TR-5: Vehicular Impacts - Intersections. Will the project create adverse vehicular impacts for intersections in Palo Alto, Santa Clara County, and Menlo Park?

14 -8 We strongly support mitigation TR-5B, trip, reduction and monitoring. This approach has far greater benefits for the environment and the community at large than widening intersections does. We do, however, feel that we need to repeat our concern about proper monitoring and enforcement of "no net new commute trips". The effect on intersections in surrounding communities will not be as intended if commute trips merely stop just short of Stanford's boundaries and continue the last mile or so by alternate means!

TR-6: Residential Streets. Will the project result in traffic impacts to surrounding residential neighborhoods?

14 -9 We believe that the analysis of this impact is somewhat lacking in its assumption that "no net new commute trips" will mean "no additional peak hour cut-through traffic". First, as we have mentioned, there are many folks already for whom the commute trip means driving into our neighborhood and parking. This is cut through traffic, despite the change in mode before Stanford lands are reached.

Second, we are also concerned about traffic at times other than at peak period. Drivers whizzing through our residential streets to expedite their trip are unwelcome (and significant) at any hour. Suitable measures (such as the T.I.R.E index) must be included in the analysis and suitable mitigations imposed.

Although Stanford Avenue and California Avenue are designated as collector streets, they are residential collectors and traffic which uses them to bypass other congestion must be included when considering the effects of "cut through". Both streets are already heavily used by non-local traffic as are our neighborhood's internal streets.

We believe that the mitigations should be more specifically spelled out and will of necessity include traffic calming measures along Stanford Avenue between Bowdoin and El Camino Real as well as measures to discourage drivers from cutting through College Terrace. We believe that Stanford should pay for their share of any necessary studies and calming measures and that for this purpose, Stanford traffic should include both existing and new traffic from the campus and from the Research Park. Specific thresholds for non-local traffic should be established for each street and additional mitigations specified if those thresholds are reached. Independent monitoring must be used to ensure that the results are not sullied by conflict of interest.

Finally, we are concerned that mitigation TR-6B will deal with impacts in a piecemeal fashion in the area of our neighborhood. Many of these projects will impact us but if only site-specific traffic studies are required, the models in use may find the impacts of each to be "less than significant". The cumulative impact on our neighborhood, however, is likely to be quite significant simply

because of our geographic position. This cumulative impact should be suitably mitigated.

TR-7: Construction. Will the project create additional construction traffic causing a substantial reduction in land use or a reduction in mobility?

14-10 We are pleased to see that Stanford will be required to keep their construction vehicles under control. In particular we are pleased to see that mitigation TR-7E: Construction Truck Routes does not include Stanford Avenue as a potential route. Previous construction has used this route with significant noise and congestion impacts.

We are concerned that mitigation TR-7D: Restriction on Construction Hours allows deliveries before 8:00 AM since no construction is allowed in Palo Alto before that hour. We believe that in areas immediately adjoining Palo Alto residents, the hours of construction should be consistent with those allowed in the City.

14-11 HWQ-1: Surface Water Hydrology. Will the project cause increased runoff due to creation of impervious surfaces?

We are pleased that the EIR acknowledges the likelihood of additional runoff resulting from this project and the need to deal with it.

We are very concerned, however, that the mitigations proposed are vague in nature and do not deal with the fact that flooding already occurs at the points where the watershed areas M-3 and M-4 enter the Palo Alto storm drain system. The City's plans for rebuilding its storm drains do not include improvements at these two locations since this is apparently considered to be Stanford's problem.

It is vital that this weakness be addressed and specific mitigations spelled out in the EIR to protect Palo Alto residents from future flooding.

This same concern was raised when the recent addition of graduate student housing in this same area was proposed in 1998. In accepting the negative declaration at that time, residents were promised that a comprehensive plan for runoff in the area was underway and would be complete mid-1999. This plan should be included in the GUP and should be evaluated for adequacy before additional development in the area is permitted. Since the impacts of the graduate student housing currently under construction were not mitigated under the negative declaration, the cumulative impact of both the current project and the development proposed under the GUP must be evaluated together.

14-12 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?

We are concerned that mitigation PS-1D: improve the Wastewater Collection System specifies that Stanford shall replace the sewer lines at Yale Street and Stanford Avenue if necessary and that this will reduce the impact to "Less than Significant". This proposed replacement itself has the potential of introducing significant construction impacts which need to be considered and controlled. Appropriate measures to control dust, hours of construction, bicycle and pedestrian access, truck routes, and damage to public roadways during the construction must be imposed as part of this mitigation.

14 -13 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 significant thresholds?

Although we are not qualified to comment on the specific emission impacts, we would like to point out that the vehicle fleet mix of 80% light duty automobiles, 10% light duty trucks and 10% motorcycles is not consistent with what is observed on our streets. This area has a large and growing proportion of SUVs and the fleet mix at Stanford is no doubt changing as well. We are also concerned that the assumptions behind the number of vehicle trips generated by the new construction will only be true if the "no net new commute trips" model is enforced with residential neighborhood parking permits.

14 -14 AQ-4: Will the project create objectionable odors?

We believe that there is at least one site related to Stanford development for which nuisance odor complaints occur more than 10 times per year. This is the wastewater pipe junction at Yale Street and California Avenue. Unfortunately, residents have not been complaining to the BAAQMD since we had never been informed that we needed to do so. We have also gotten tired of complaining about it to the City since we are always told that little or nothing can be done about it. As the quantity of waste produced by Stanford increases, we expect that this problem will worsen. It is a significant impact and should be mitigated.

14 -15 NOISE-1: Will construction of the project expose the public to high noise levels?

We are extremely concerned about this impact. With the proposed construction of more than a thousand units of housing on the borders of our neighborhood, it appears that we will be subjected to a high level of construction noise over a period of years.

In addition to the noise sources included in the analysis, we would like to suggest that the sound of backup beepers on construction trucks should be analyzed. This sound is by design extremely piercing and can be heard more than a mile away. Steps should be taken to lessen the impact on residents and on school children in the vicinity.

In addition, we would like to suggest that the hours of construction in areas adjoining Palo Alto residential neighborhoods should be limited to the most restrictive imposed by the County and the City. This would mean limiting construction to 8:00 AM - 7:00 PM Monday to Friday, 9:00 AM to 7:00 PM on Saturday, and no work on Sundays or holidays.

14-16 NOISE-2: Will operation of the project expose the public to high noise levels?

We request that noise generated by sports facilities be included in the list of operational noise sources. Upgrading of many of these facilities has gone on over the previous few years without any sort of review or mitigation and we believe that such "upgrades" will continue under the new GUP. We would like to see suitable standards for loud speaker use imposed and monitored.

14-17 NOISE-3: Will operation of the project expose the public to high traffic noise levels?

We must question the statement that "Noise levels at Receptors 1 and 3 were predicted using the speed limit posted of 25 mph on Embarcadero Road and Stanford Avenue, assuming that future traffic calming on Embarcadero will bring speed closer to posted limits". Traffic calming measures on Embarcadero will do nothing to bring speeds on Stanford Avenue closer to the posted limit. Current 85th percentile speed is above 35 mph.

The EIR for the 1989 GUP addressed noise in this area specifically. The finding at that time was that "exposure of the homes in Palo Alto bordering Stanford Avenue to problematic noise levels is virtually assured by their relative proximity to that roadway." It was further observed that there

was "good agreement between the predicted noise levels (assuming average speeds in the low to mid 30s) and their observed values at the measurement locations" (emphasis mine). It was suggested that lowering the speed of traffic to the 25 mph posted limit would be the most effective way of reducing noise along Stanford Avenue.

We strongly prefer that traffic calming measures be added to Stanford Avenue as a mitigation for the noise. However, unless that is made a condition of approval, the noise analysis must be done using the current speeds. This is particularly important since speeds are often higher at night when the traffic is lighter and the effect of the noise more significant.

This is most likely a significant impact at Receptor 3 and suitable mitigations (traffic calming measures) should be required.

Thank you for your consideration of our concerns and recommendations.

Regards,

Pria Graves

Coordinator, College Terrace Residents' Association

Cc: Planning Commission, Santa Clara County Joseph Simitian, County Supervisor

Dear Joe and Sarah,

Below is a complete copy of email I sent earlier this week to the Palo Alto City Council and to the Planning and Transportation Commission.

Based on public web information and on personal phone calls, it is clear that Stanford's growth plans are way out of line with plans of four peer institutions. I believe the County would be completely justified in asking Stanford for a major cutback in the current proposals.

Sarah, could you please include this in the public comments regarding the EIR? Thank you.

Sincerely,

jeb eddy, palo alto

Subject:

Other University Growth Plans

Date:

Mon, 24 Jul 2000 18:14:51 -0700

From:

jeb eddy <jebeddy@wigl.com>

To:

city_council@city.palo-alto.ca.us

TO: Palo Alto City Council, and Planning and Transportation Commission

RE: Stanford Community Plan and GUP

Subject: Informal Research on Other University Growth Plans

From: Jeb Eddy

Date: 24 July 2000

As promised, I enclose a list of web addresses, and comments.

I would be delighted to discuss any of this with you, City staff, or anyone else you care to suggest.

Institutions contacted:

Harvard

TIM

Yale

Princeton
City of Cambridge
City of New Haven

Sources:

A) the web

- 1) All the universities have a Web-based "fact-book." To me it is frankly very exciting to view so much history of great institutions in this manner. Of course, the specific data and the periods of time covered in these public facts vary widely; the units of measure may not be strictly comparable across schools, etc. But many basic facts like acreage, student body composition, faculty size, etc. are described.
- 2) Three universities (Harvard @ \$2.1 billion, Princeton @ 1.1 billion, and MIT @ 1.5 billion) have recently completed campaigns or are in the midst of raising substantial amounts of money. (Bill Gates gave a measley \$25 Million to MIT; I trust Stanford can do MUCH better it its next fund raiser.) Information on the web sites for these development campaigns indicates in considerable detail what this money is to be spent on.
- 3) Current and archived news releases are a good source of financial and administrative highlights for many years, including the capital campaigns.
- 4) All the universities have offices for things like Facilities, Architecture, Planning, Buildings and Grounds.

Sites:

Yale:

http://www.yale.edu/oir/factsheet.html

MIT:

http://web.mit.edu/ofms-space/www/wsahpimages/MIT_GFA_GDT.pdf

http://web.mit.edu/newsoffice/factsmit.html

http://web.mit.edu/campaign/x/notoptional.html

http://web.mit.edu/campaign/x/researcheducation.html

Princeton:

http://www.princeton.edu/pr/facts/profile/99/25.htm

http://www.princeton.edu/pr/reports/wythes/02.htm

http://www.princeton.edu/pr/news/00/q3/0719-campaign.htm

http://www.princeton.edu/pr/admissions/u/brief/brief.html

http://www.princeton.edu/pr/reports/nude_olympics/finalrep.htm

Harvard:

http://vpf-web.harvard.edu/factbook/

http://www.haa.harvard.edu/html/contin03.html

http://vpf-web.harvard.edu/factbook/99-00/page5a.htm http://vpf-web.harvard.edu/factbook/99-00/page37c.htm http://vpf-web.harvard.edu/factbook/99-00/page37b.htm

http://vpf-web.harvard.edu/Budget/factbook/99-00/page38b.htm

B) Personal contacts

After doing some initial homework on the web, I started calling by phone.

I clearly and consistently identified myself as a citizen gathering information so that the Palo Alto Planning Commission and City Council can understand Stanford's growth of plans in the the context of some peer institutions.

At no university or city did I contact people in identical positions; I was happy to talk with whomever was there, usually a mid-level university or city administrator. I have no doubt that "official" channels would say that some of these contacts were unauthorized. In one case I asked the Provost's administrative assistant to write down my question ("Does the forseeable future include significant growth in student body or faculty?") and the answer came back simply "No."

Obviously I do not claim that the web resources I found and the telephone contacts I made are a scientific or statistically representative sample. And the local legal contexts and time frames used by these schools are of course different.

Main Conclusion:

Nevertheless, in my opinion, these explorations result in some satisfactory and relevant general conclusions. The most important is this:

Except for 500 undergraduate students at Princeton, there is no mention of plans for major expansion of student body, faculty, staff or facilities at any of the other universities.

Other findings include:

-- there is a definite mention of improved student housing, and extensive upgrading of academic facilities, but little or no **net**

expansion (except for Princeton).

- -- except for Harvard, there has been the only modest growth in academic space during the past decade.
- -- during its recent \$2.1 billion campaign, Harvard expanded its faculty by a total of 28 .
- -- the size of the student body and faculty at all these institutions has remained quite flat for the past decade .
- -- Yale has very recently completed a 25-year ("one generation") plan, called a "framework" for future development. By telephone, a senior planner told me that expansion of student body or faculty were explicitly NOT included in the assumptions used for this long-range vision.
- -- a City of New Haven planner praised the new framework, and described the current excellent relations between city and university. He said that the university has learned from its past mistakes, and that large plans would be met with an immediate strong backlash.

In closing ...

>From all this, I conclude that Stanford is not necessarily being externally driven to the rapid continued growth being applied for in its Community Plan and General Use Permit.

Compared with this set of its peers, I believe that Stanford will not be permanently hurt by growth on the order of the Reduced Scale project discussed in the EIR.

Stanford has totally disregarded repeated requests for some indication of vision and ultimate build-out; Yale has done this quite successfully.

15-2 I urge the Palo Alto Planning and Transportation Commission and City Council to send a strong message to the County Planning Commission and Board of Supervisors in favor of a substantially reduced plan and permit for Stanford (while still encouraging more housing), as indicated in the excellent draft document already prepared by Mr. Gawf and the City Planning Department. Our local communities and Stanford need some time to adjust to the recent and current growth shocks from roads, housing, and academic buildings of the past decade.

And, says Jeb, waving a blue bumper sticker,

"SAVE THE FOOTHILLS."



"PICKERING,BARB ARA (Non-HP-SantaCla ra,ex3)" <barbara_pickeri ng@non.hp.com>

To: "'sarah.jones@pln.co.scl.ca.us'"
<sarah.jones@pln.CO.Santa-Clara.CA.US>,
"'joe.simitian@bos.co.scl.ca.us'"
<joe.simitian@bos.CO.Santa-Clara.CA.US>

cc:

Subject: Stanford's Dish Hill -- keep it open space

07/24/00 11:46 AM

Hi,

16-1 I would like to register my support for limitation of Stanford's development on their Dish Hill area, and for maintaining it as an "open space."

I understand that this is private property, but I also know that Palo Alto's Urban Service Boundary is along Junipero Serra Blvd. (excluding the golf course) and this can be used as a natural boundary to limit further urban development. If a progressive institution such as Stanford will not support limiting urban sprawl, who will (the local government hopefully...:-)

As a resident, I frequently use Dish Hill as a place to hike that is close to home, and is a welcome relief to the urban sprawl that is quickly overtaking the South Bay area. I particularly notice that there are many breeding pairs of red-winged blackbirds, and many other breeds of bird, and think this is a wonderful place to maintain as an open space.

16-2 I'd also like to say that although I don't own dogs, I think the bit about enforcing on-leash or no-dogs on the hill is ridiculous. The impact to the "salamander" population will be much greater if their natural lake is filled in and acres of buildings are erected. Give the dogs a place to run.

I support the proposal to change the classification of the area from "Academic Reserve and Open Space" to "Open Space and Field Research," as recommended by County staff.

That's my two cents. Please vote on behalf of the environment and not on behalf of the controlling institution. Thanks!!

Barbara Pickering



"David E. Wilkins" <wilkins@ai.sri.c om>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

Wilkins" cc: wilkins@ai.sri.com <wilkins@ai.sri.c Subject: Stanford Development

07/25/00 06:31 PM

As a resident of the Palo Alto area for 27 years, I would like to communicate my concerns about Stanford's plan to develop its golf course.

- 17-1 I believe such development would significantly detract from the quality of life here. A few brief points:
 - 1. The Stanford Golf Course is a area-wide recreational resource in an area with too few golf courses; moreover, it is a world-famous, championship golf course, the work of the great golf architect George Thomas;
 - 2. It has Open Space and environmental protection values;
 - 3. That elimination of the first hole-the University's "modest proposal"--would effectively cripple the golf course, and Stanford has no realistic plans to replace the hole; You can't separate the Clubhouse from the first hole by a quarter mile.
- 17-2 I am against any plans that would remove the First Hole or any other portions of the Golf Course, and would encourage Stanford to increase the density of it's housing to accommodate more people on less land, or to redo its agreement with Palo Alto on the use of the land between the golf course and Sand Hill Road.

Thank you for your time,

David Wilkins

(fixed-width font required:)

David E. Wilkins Artificial Intelligence Center SRI International EJ227 1(\ /) | 333 Ravenswood Ave. // | \ \ \ Menlo Park, CA 94025 _ |))_ _((| _ (((\ \ |_/)_ (\\\\ _/ / \ _/ ////) \ / Internet: wilkins@ai.sri.com \ Phone: 650/859-2057 _ Fax: 650/859-3735 WWW: www.ai.sri.com/~wilkins

DEPARTMENT OF TRANSPORTATION

P O BOX 23660 OAKLAND, CA 94623-0660 Tel: (510) 286-4444 Fax: (510) 286-5513 TDD (510) 286-4454





July 26, 2000

SCL-280-20.61 1999112107 SCL280278

Ms. Sarah Jones Santa Clara County Planning Office East Wing, 7th Floor 70 West Hedding Street San Jose, CA 95110-1705

Dear Ms. Jones:

Draft Environmental Impact Report (DEIR) for the Stanford University Draft Community Plan and General Use Permit Application, Santa Clara County

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed project. We have examined the above-referenced document and have the following comments:

18-1 Volume II, Appendix C2 (Level of Service Calculation); turning 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 through the entire level of service analysis for future year 2010. In addition, the Alpine Road / Interstate 280 interchange should be included in the level of service analysis.

Please provide Caltrans with detailed design plans early in the development process as the geometric layout of State facilities will be impacted by the proposed project.

Should you require further information or have any questions regarding this letter, please call Haiyan Zhang of my staff at (510) 622-1641.

Sincerely,

HARRY Y. YAHATA District Director

By I days 3hrs

JEAN C. R. FINNEY
District Branch Chief
IGR/CEOA

c: State Clearinghouse



"Jon Corelis" <jcorelis@hotmai l.com>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Comment on Stanford Draft EIR (SCH #1999112107)

07/27/00 07:00 PM

FROM: Jon Corelis

2134 Williams Street Palo Alto CA 94306 tel (650) 691-2235 jcorelis@hotmail.com

TO: Sarah Jones, Associate Planner
Santa Clara County Planning Office
70 W. Hedding St., E. Wing 7th Floor
San Jose, CA 95110
sarah.jones@pln.co.scl.ca.us

Dear Ms Jones:

19 -1

I am writing to comment on the Stanford University Draft Community Plan and General Use Permit Application (State Clearing House Number 1999112107) Draft Environmental Impact Report.

First let me state the basis of my concern with this issue. I live in the College Terrace neighborhood of Palo Alto, my home is a sixty second walk from the area on Stanford Avenue which serves as the focus of much of the Draft, and I daily walk, commute, and shop using the streets studied by the report. I have also lived for thirty years (with brief breaks) in Palo Alto and Stanford, and I am a Stanford graduate and a former long term Stanford staff member.

I can sum up my comments by saying that, having read the response to the Draft which has been prepared by the College Terrace Residents Association (CTRA), and which I understand will be submitted on August 3 at the County Planning Commission hearing by CTRA Coordinator Pria Graves, I fully endorse every point made by that document and feel that it covers every concern I have about this project as a long term local resident.

Thank you for considering my comments.

Yours truly,

Jon Corelis



CHAMBER OF COMMERCE

20 -1

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Tom Richman & Associates
DAVE ROSS

Jack & Cohen Builders, Inc.

RICK STERN Stern Mortgage Company

ANNE WILBUR Wilbur & Associates July 28, 2000

Dear Santa Clara County Planning Commission,

Several months ago the Palo Alto Chamber of Commerce Board of Directors commented on specific aspects of the Stanford Draft Community Plan and General Use Permit applications. While we are still reviewing the results of the recently released EIR report and have not taken a formal position, we do feel it is important to comment once again on the plan.

We have been pleased with Stanford's efforts throughout this process to be inclusive of the many constituencies in the Stanford and Palo Alto communities as well as the larger region impacted by this plan. We have also been impressed by the willingness of members of those constituencies to play an active role. The role Stanford University plays in maintaining the remarkable quality of life we all enjoy cannot be underestimated. Stanford's ability to continue to be a world-leading educational institution is of critical importance to the well-being not only of Palo Alto but of the entire region.

The Chamber has long been a strong supporter of the construction of new housing. Stanford's proposal to build significant on-campus housing for students, faculty and staff is not only commendable, but grows ever more critical to the overall economic and social well-being of this area. High-density housing on the sites identified, as well as the provision of a variety of housing types, are seriously needed and will have tremendous benefits. In addition, these units will be located near and have access to transit systems.

Other goals in the plan--preservation of open space over the duration of the permit; conservation of sensitive biological resources; concentrating development in the core campus; reducing reliance on the automobile through alternative transportation and circulation improvements; and providing limited, on-site retail to serve on-campus residents--are all appropriate and beneficial.

The Chamber is also encouraged by the progress made through the continuing dialogue among Stanford, the school district and the City of Palo Alto. We urge that the parties continue to work toward a solution to the increase in school population as a result of new housing. We are also concerned with the possible displacement or loss of services provided to residents of this community. We strongly urge that negotiations among Stanford, the school district and the City of Palo Alto continue so that a solution be reached that addresses the very real concern of overcrowded schools, as well as the related traffic, childcare and diminished public services impacts.

and the control of th

Again, we continue to be encouraged by the progress being made by the City of Palo Alto, Stanford University and Santa Clara County in reaching a General Use Permit for the next decade. We look forward to taking an official position on the final plan.

Sincerely,

Mark Sabin

Chair, Government Action Council

Georgie Neim

Chair, Board of Directors

Charlotte Cagan

President/CEO

ROBERT AUGSBURGER

176 Alta Vista Avenue Los Altos, California 94022 Phone 650-948-1760/FAX 650-948-8266 e-mail raugs@pacbell.net

July 28, 2000

Planning Commission County of Santa Clara County Government Center 70 West Hedding San Jose, CA. 95110

Dear Members of the Planning Commission,

This letter is in response to the draft environmental impact report concerning the Community Plan and General Use Permit application of Stanford University.

21-1 In response to a request for comments on the scope of the proposed EIR, I wrote to Sarah Jones of the County Planning Department on December 17, 1999 recommending some three alternatives and eight mitigation measures to be considered in the preparation of the EIR. The draft EIR addresses some of these and completely ignores others.

One of the alternatives ignored is of sufficient importance that I have chosen to limit my comments to it. The suggested alternative was:

"Relocation of all new faculty-staff housing proposed for the academic campus and Stanford Avenue, together with middle and elementary schools and community services, either to the area southwest of Page Mill Road and Junipero Serra Boulevard or alternatively to the area south of Page Mill Road between Foothill Expressway and Deer Creek Road."

Subsequent events have proven that the failure to consider and evaluate this alternative is unfortunate for both Stanford and the greater community of which it is a part.

In my twenty-nine years as a resident of this area there has always been a housing shortage, particularly of that deemed to be "affordable". Today, it has reached crisis proportions. This shortage is largely attributable to resistance to change by the body politic and the resultant reluctance of governmental officials to plan for and meet growth in demand. Everyone

knows that housing is needed and wants to see it built as long as it is not in their neighborhood. For example, it has taken the University twenty-five years from the time housing was first proposed on Sand Hill Road to bring those plans to fruition. How very sad.

Stanford, in its own self-interest has proposed 2000 new units of student housing, 350 units of postgraduate housing, and between 302 and 668 units of faculty-staff housing in its General Use Permit application. The ink was hardly dry when the protests began to come in ---- first from its own campus residents over modest infill projects, next from residents along Stanford Avenue over a row of townhouses across the street, then from the golfers over the destruction of their beloved Hole #1. And, we haven't even heard yet from the students who may be affected by the housing developments near them.

Couple these events with the suggestion in the draft EIR that academic growth be linked to housing construction, i.e. that permits for construction of academic facilities be issued only after the completion of associated housing. Given the prevalence of NIMBYism on and off campus, it is entirely possible that Stanford would be completely stymied in its efforts to meet new academic needs. While some segments of the community would be happy with that result, I do not think it is a responsible position to take.

In order to give the University some flexibility over the next ten years, it must have more housing alternatives than those proposed by it. Consequently, the EIR should include an evaluation of the use of either or both of these two sites along Page Mill Road. There are obvious pluses and minuses to the use of these sites for these purposes, but we need to have a detailed analysis if we are to do an adequate job of planning.

I ask that you direct that this alternative be considered in the final EIR.

Thank you.

Sincerely,

Robert Augsburger

Colout Cogeling

cc: Sarah Jones - County Planning Office 'Larry Horton - Stanford University



GForman806@aol. com

To: sarah.jones@pin.CO.Santa-Clara.CA.US

07/29/00 01:15 PM

Subject: Fwd: Stanford's Development Plans

---- Message from GForman806@aol.com on Sat, 29 Jul 2000 16:09:16 EDT ----To: lizkniss@earthlink.ne

Subie Stanford's

ct: Development Plans

Dear Mayor Kniss:

Thank you for inviting responses to Stanford's GUP. I was one of the concerned citizens holding up the Save the Foothills bumper stickers at the July 26th City Council Meeting. I went to that meeting despite having to tote along my one-year old because of the seriousness and importance of the issue. As a graduate of Stanford, former faculty member in the School of Medicine, citizen of Palo Alto for 19 years, and mother I am VERY concerned about Stanford's growth during the past decade and proposed growth over the decade to come. I am not usually an activist, but Stanford's proposed development plans are such an egregious assault on our community that I had to get involved. I joined the Stanford Open Space Alliance.

I moved to Palo Alto from the L.A. area to attend Stanford 19 years ago. I recall how struck I was at the improved quality of life in Palo Alto due largely to the lack of congestion, lack of urban sprawl, and presence of green open spaces compared to L.A. However, I have been appalled at the rate of growth in Palo Alto and Stanford's rate of development over the past 10 years and both have significantly impacted my quality of life as a citizen. The traffic is unbearable, the price of housing is obscene, and more and more green open spaces are being developed and turned into concrete. Palo Alto and surrounding areas are on a fast-track to becomming another L.A. basin and Stanford has a large role in this destruction.

Stanford appears to have lost sight of it's responsibility to the community in which it operates. Stanford's plans to redesignate land southwest of Junipero Serra as core campus allowing development in the foothills is appalling disregard of the environment and the quality of life of our

- 22 -1 community. I urge you to work tenaciously to oppose Stanford's plans and set
- 22 -2 aside the foothills as permanent open space. Additionally, I believe that Stanford should find an alternative to the current site proposed for the
- 22 -3 Carnegie Foundation. Stanford's plan to re-classify the golf course to allow for housing development is a potential major change in land use and I urge you to strongly oppose this.

In summary, Stanford's plans for development are, in my opinion, an appalling affront to our environment and our community and if allowed to proceed will 22 -4 destroy precious open space and create increased traffic and congestion that will forever change the quality of life in this area.

I urge you to oppose Stanford and protect our community from urban sprawl and becomming another L.A. basin.

Christy Telch 1130 Hamilton Ave Palo Alto, CA 94301 (650) 321-9439

SECTIVED July 30, 2000 03 Mg = 7 AHD: 51

Sarah Jones Santa Clara County Planning Dept. 70 West Hedding St., 7th Floor San Jose, CA 95110

Subject: Stanford CP/GUP Draft Environmental Impact Report

Dear Ms. Jones:

I am submitting the following comments in response the Stanford Community Plan DEIR.

General Comments

Given the size and scope of the current project, which includes four million acres of new development, it seems an appropriate time for the county to establish a genuine long-term open space plan on the unincorporated lands that constitute the Stanford foothills.

23-1 Stanford's relentless expansion is having a tremendous negative impact on the quality of life in neighboring communities. 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.

Stanford owns and controls some of the Mid-Peninsula's largest commercial corridors. Yet, after building tens of millions of square feet of commercial and residential development in the foothills, Stanford has repeatedly balked at any commitment to open space on any part of its contiguous 8100 acres. Instead, they now only offer a 10-year moratorium on development of one section of the foothills while they continue to whittle away what remains. This hardly constitutes an open space plan.

Academic Growth Boundary

23 -2 The Academic Growth Boundary should be consistent with Palo Alto's Urban Service Boundary along Junipero Serra and should be made permanent.

The entire golf course should remain outside the boundary and remain protected from development.

Lathrop Development District

23-3 The proposed CP land use designation (Academic Campus) for the Lathrop Development District is inconsistent with existing low-intensity structures and

access roads in the area. The re-designation of Lanthrop also sets a precedent for future development west of Junipero Serra.

Land Use Designations

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.

Stanford Game Refuge

The Stanford property is designated a California state legislative refuge based on its value as a wildlife study area. Both the EIR and community plan fail to properly identify the refuge and the value of its wildlife resources in this context. The refuge should be identified in long-range planning documents and the accompanying EIR. I brought this matter before the county in the 1989 GUP EIR and it was never properly addressed. I will submit a short letter reviewing the issue and attach relevant sections of the 1989 GUP and correspondence.

Access Policy in the Foothills

23-6 Stanford has allowed public access to the foothills for decades and should continue to do so in the future. The DEIR does not adequately address Stanford's foothills access policy as significant impact or mitigation issue.

The DEIR inaccurately suggests that Stanford does not officially sanction public use of open space in the Foothills. Section 4.2A states that the foothills around the dish are "not officially designated for recreational use, but are commonly used by the public for jogging and hiking."

Regardless of whether Stanford chooses to officially designate the Dish as a recreation area, it rivals Stevens Creek and Rancho San Antonio as one of the most popular public open space areas in the county.

In fact, Stanford has invited the public to use the trails here for several decades. They've added pedestrian access gates and posted large inviting signs at the trailheads, which described the academic reserve and its trail system. In the late 1980s Stanford went so far as to hire a ranger to patrol the area complete with a public relations campaign that included an article introducing the ranger to the public in the Palo Alto Weekly.

The failure to recognize the public as a legitimate recreational user group is brought out when the EIR discusses open space impacts of the project.

The Impact analysis in section 4.2C, OS3 does not seem to refer to impacts of the project as it affects *public* access to open space at all. The section is entitled "OS-3: Will the project adversely affect recreational opportunities for existing or new *campus residents*

and facility users?" The section goes on to analyze impacts as they affect campus residents and faculty. It reads as follows:

In addition to housing development in recreational areas, Stanford proposes to engage in habitat and environmental restoration in the portion of the foothills known as the "Dish". Consistent with the goals of habitat management, existing recreational opportunities will be restricted by the establishment of formal trails in order to avoid habitat degradation that results from uncontrolled access as part of Stanford's Conservation and Use Plan for the Dish area. This Plan calls for restoration of degraded portions of the foothills, restriction of use to 4.5-mile trail loop, and prohibition of dogs in the area. This plan is not a part of the CP/GUP project, and is not guaranteed to happen. It is also subject to change.

The plan the EIR refers to actually concerns a decision earlier this year to restrict *public* access to the area. Why then does it only list it as an impacts as they concern "campus resident and faculty" recreation? The EIR should accurately reflect the current setting regarding public access in order to mitigate the effects of any changes to Stanford's open space recreation policies in this plan.

In addition, I challenge the EIRs contention that the proposed restrictions on access are not part of the community plan. Stanford's new access policy should be part of the community plan and should be included in the EIR.

Sincerely,

Eric Fertig

251 Embarcadero Road
Palo Alto, CA 94301 (3 ***) - 1 (11:2)
July 30, 2000

Ms. Sarah Jones Associate Planner Santa Clara County Planning Office 70 West HeddingStreet, East Wing, 7th Floor San Jose, CA 95110

Re: DEIR for the proposed Stanford University Community Plan/General Use Permit (County File #7165-07-81-99GP-99P-99EIR)

Dear Sarah,

Thank you for the opportunity to comment on the Draft EIR for the Stanford Community Plan and General Use Permit.

I noted the various analyses done, and appreciate the attention paid to various issues raised during the scoping process. Some of these comments are regarding the analyses, and some of them are to express a preference for certain decisions to be made.

1. <u>Limit number of new parking spaces</u>. See page 4.4-84. As the analysis notes, a parking surplus will be created if the requested 2873 parking spaces are permitted and "this parking surplus may undermine future trip reduction efforts, as parking restrictions are a recognized means to reduce auto use."

Combined with a strong alternative transportation system and parking charges, the amount of parking is perhaps the single most important control that the government can impose on a development. Stanford already has a mind-boggling 19,351 parking spaces! I strongly support limiting the amount of new parking spaces on campus, especially for non-residential development and at most to the 2267 spaces noted in the analysis.

24-2 2. Do more to minimize traffic impact/parking for the proposed arena and performing arts center. Although these two centers are welcomed as cultural/sports centers for the peninsula, I did not see adequate discussion about managing them to maximize public transit access. Regional facilities need regional public transit to avoid massive traffic problems. Can we condition their approval on a commitment to frequent "special event" shuttles to Caltrain designed for special events, to charge for parking, and effective public relations campaign to minimize new car trips? Even if they do not impact peak hour traffic, automotive traffic in evenings and on weekends undermine the

liveability of our residential arterials and neighborhoods.

- 3. Analyze parking structure in site-specific study. The Daper area will have 1267 new parking spaces, according to the DEIR. This sounds like an undesirable increase of traffic on Embarcadero Road, which already suffers from noise, pollution and safety problems. I would like to see a "site-specific traffic study" for any parking structure planned for that area.
- 4. Need better mitigations for bike/pedestrian crossing at El Camino. I would like to see mitigations for bicyclists and pedestrians who try to cross El Camino at any of the intersections near Stanford. It is already intimidating and dangerous because of the speed and volume of traffic, all the cars taking a left hand turn over the crosswalk even when the pedestrian light is green, and the long length of road we have to cross. Unless we take the shuttle, commuters, students and visitors must somehow cross El Camino safely to get to Stanford from the train station or Palo Alto. Besides the safety issue, it is noisy and unpleasant to walk along these streets and cross them, which encourages people to take their cars rather than walk or bike.

So I fully support the No Net New Commute Trips (TRAN-A), Tran-C (trail system), Tran-D (reduced parking and Hous-A (linkage between housing and academic development) as key to reducing traffic impact on an area and street system which is already overwhelmed.

In addition, I fully support the concept of "permanent" open space in the foothills as partial mitigation for the dense development proposed.

There is more to be said, but I will close here -- thank you very much for your consideration.

Sincerely yours,

Yoriko Kishimoto 650-322-7831



Deanna Mann <dlmann@ix.netco m.com>

.

07/31/00 08:07 PM

To: Sarah.Jones@mindspring.com, County.Associate.Planner:@CO.Santa-Clara.CA.US

CC:

Subject: Save the Stanford golf course

Dear Ms. Jones

I am a faculty spouse at Stanford, so I do see the necessity to create new housing for faculty and graduate students. However, it makes no sense to me to destroy Stanford golf course in order to build housing. There are other alternative sites for building the necessary housing if Stanford would take the time and spend the money to use these other sites. Suggestions that have been made to Stanford such as building parking structures, making existing housing more dense etc have gone unheeded due to the cost and effort it would take to implement these other ideas. I hope that the County does not give into the demand from Stanford for authorization to build housing on the 15 acres that make up the first hole of this historic golf course.

Please don't let the golf course be destroyed on our watch. Thank you for your time.

Deanna Mann-Gaba

Deanna Mann (650)965-3035



"Mark Lerner" <mlerner@norteln etworks.com> To: "sarah.jones" <sarah.jones@pln.CO.Santa-Clara.CA.US>

cc:

Subject: Open Space

07/31/00 07:20 PM

Sarah:

I will be unable to attend the planning meeting but would like to express my concern over Stanford's planned development west of Foothill expressway.

26-1 Maintaining open space is key to quality of life in this area. Once development starts West of Foothill, it will be hard to stop it.

Thanks

Mark Lerner



Kkais@aol.com 07/31/00 06:47 PM

To: sarah.jones@pln.CO.Santa-Clara.CA.US, joe.simitian@bos.CO.Santa-Clara.CA.US

cc:

Subject: (no subject)

27-1 Stanford is out of control, or at least the Planning Department at Stanford is out of control. There are many ways Stanford can add housing to the campus without tearing up the golf course.

Last week Stanford sought and received preliminary approval for the Hewlett Foundation to build a 48,000 square foot two-story office building to house the Foundation on 6.7 acres of Stanford land off Sand Hill road and Junipero Serra. The Foundation offices are currently on Middlefield Road. The Stanford land is zoned residential and could accommodate quite a number of housing units. This is just one example of Stanford's ineptitude. They would rather have rent from, and cozy up to, the Hewlett Foundation than to put housing on property where it wouldn't disrupt the golf course.

It is time for the surrounding communities to say "no" to Stanford's crazy and not very considerate expansion.

Kent Kaiser 82 Elena Ave Atherton, 94027



Sally Barlow-Perez <sbarlow-perez@ jup.com>

To: "'sarah.jones@pln.co.scl.ca.us'"

<sarah.jones@pln.CO.Santa-Clara.CA.US>

CC:

Subject: Stanford Open Space

07/31/00 03:04 PM

Dear Ms. Jones:

With regard to the Stanford Open Space. I urge you to support ending development at Junipero Serra Blvd.

Please bear in mind the fact that once lost, the open space represented by the land around the dish can never be replaced. If you fail to protect that open space now, think how you will feel when years from now, you view the clutter that was once such a rare and treasured community resource. It would be a pity to act carelessly now and regretit later.

Thank you for your attention. I'm sure you will approach this with the intelligence and concern that has marked your decisions in the past.

Sally Barlow-Perez



Allan Abbott <aabbott@microdi splay.com>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

· 👡 🚅

CC:

Subject: Stanford Golf Course

07/31/00 06:18 PM

Dear Sarah,

There are two prime reasons to reject Stanford's plan to put housing on the first seven holes of the current golf course.

- 29-1 The first is that even if an accommodation can be made for losing hole #1, it's going to raise traffic congestion and air pollution carting players from the clubhouse to the "new" first hole. And don't waste time thinking about an entirely new course somewhere in the hills . . . you and I will both be under the sod long before that gets approved.
- 29-2 The second is that San Francisquito Creek will be severely impacted by the proposed housing construction. It's hard enough preserving habitat . . . the last thing we need is to lose it to housing that can just as well be handled near El Camino or in the Stanford Industrial Park or on any of several other University-owned parcels that don't have similar habitat impacts. Stanford needs to build up, not out, and certainly not out where a creek gets compromised.

Thanks for your consideration.

Allan Abbott



Allen Cypher <cypher@stageca st.com>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC:

Subject: DEIR for Stanford's GUP

07/31/00 07:52 PM

I will be out of town for your meeting on August 3, so I wanted to send you my comments.

30-1 My main concern is for permanent Open Space protection of the Dish area at Stanford.

Please do not approve Stanford's new development plans unless the Dish area is permanently protected as accessible Open Space for the public to enjoy.

Palo Alto is greatly changed by Stanford development. The most important factor for my quality of life in this area, and for that of many residents like me, is convenient access to Open Space. At the end of the work day, I often go to the Stanford Foothills. The open hills are a unique open space area in Santa Clara, and they are also the most conveniently accessible area for Palo Alto residents.

Not only should this area be permanently protected, but it should be done in a way that makes it *accessible*. This means that it must be

- * open to the public,
- * that dogs be allowed, and
- * that people be allowed to walk on the myriad beautiful paths throughout the Dish area.

Hiking the paths is how I truly appreciate the area, and it is important to my enjoying the many hawks that I watch in the Foothills. The plan to ban dogs and limit hikers to the single paved loop would mean that we have yet one more beautiful area, like Jasper Ridge, that we cannot appreciate.

The DEIR shows that Stanford's massive development is going to have irremediable effects on our community. As compensation for the impacts we must suffer from this development, please keep this unique Open Space area permanently accessible to Santa Clara County.

30-2 I would also like to see Stanford development constrained within Palo Alto's urban growth boundary. Stanford's huge development plans are going to change the face of Stanford. It makes much more sense to change the face of El Camino Real, a central area in our County for development, than to build on the first hole of the golf course.

Thank you, Allen Cypher 860 University Ave. Palo Alto, CA 94301

Allen Cypher
cypher@stagecast.com
www.acypher.com

Stagecast Software, Inc.

(650) 599-0399

www.stagecast.com

From: Nils Davis <nils.davis@netiq.com>
Date: Mon, 31 Jul 2000 17:30:36 -0700

To: "lizkniss@earthlink.net" <lizkniss@earthlink.net>, "'city_council@city.palo-alto.ca.us'"

<city_council@city.palo-alto.ca.us>

Cc: "barbara.laskin@pln.co.santa-clara.ca.us'"<barbara.laskin@pln.CO.Santa-Clara.CA.US>, "joe.simitian@bos.co.santa-clara.ca.us."<joe.simitian@bos.co.santa-clara.ca.us.."CO.Santa-Clara.ca.us.....CO.Santa-Clara.ca.us...CO.Santa-Clara.ca.us...CO.Santa-Clara.ca.us...Co.Santa-Clara.ca.us...Co.Santa-Clara.ca.us...Co.Santa-Cl

Subject: New middle school; Stanford GUP issues

The Stanford GUP includes plans 3000 new housing units, and offers \$10M in mitigation. This is close to the cost *just for new classroom space* for the new students added to the schools, but covers none of the \$3-6M in added yearly costs. Stanford should provide additional mitigation.

I agree with the City's staff report, which basically says, on this issue:

- * legally required impact fees are not enough to cover the actual impacts of the proposed SU development to schools within the PAUSD.
- * options "include the possibility of constructing a third middle school on Stanford land, reopening closed schools, or modifying existing schools. The City of Palo Alto strongly believes Stanford needs to be actively involved in the discussion and eventual implementation of additional options for addressing school impacts."
- * "The EIR should provide a more viable school site than [Deer Creek] Alternate school sites should be more proximately located to the population they are to serve and should be within the Palo Alto urban service area."

I believe that the \$10 million offered by Stanford in lieu of a site on their land is inadequate.

- 31 -2 I also believe that the old Mayfield School site at Page Mill and El Camino should be considered for a new middle school.
- 31-3 I also believe 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.

I live in Barron Park, but seldom am impacted (thank God) by the high school traffic on Arastradero. I always make certain not to drive by JLS during drop-off and pick-up times. My daughter just graduated Palo Alto High in June, so I'm speaking merely as a concerned citizen. I was much less impacted than parents of *current* middle school students are by traffic and other problems, having just missed the huge wave of kids.

Nils Davis

Nils Davis Product Manager NetIQ Corporation 408-330-7112 nils.davis@netiq.com Herb Borock
P. O. Box 632
Palo Alto, CA 94302

July 31, 2000

Palo Alto City Council 250 Hamilton Avenue Palo Alto, CA 94301

STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT DRAFT ENVIRONMENTAL IMPACT REPORT, STATE CLEARING HOUSE # 1999112107

SANTA CLARA COUNTY FILE # 7165-07-81-99GP-99P-99EIR

"Once land has been developed and Stanford has made a substantial investment in off-site improvements (streets, utilities, etc.), financial considerations generally will militate against returning the site to open space use. Consequently when a decision is made that land is to be devoted to development, it should be considered lost for open space purposes not only for the lease term but for a long time beyond, perhaps permanently."

-- Stanford University Land Use Policy/Plan prepared by Livingston and Blayney, City and Regional Planners, 1971, pages 12-13. < BR>

"PAW: What would you say your biggest failure has been?

"Knox: One of things I'm most upset personally is when we did the Comprehensive Plan (in 1976) I felt there wasn't much use trying to rezone industrial land for housing. It was an idea whose time had not come. And I didn't see any problem with going on with the build-out of the industrial park.

"I think that, in a sense, as a planner I failed the city in not recognizing that little by little, increment by increment, those buildings were going to surround Coyote Hill and you weren't going to be able to see the top."

-- Palo Alto Weekly interview of Palo Alto Planning Director Naphtali Knox published February 26, 1981, at page 13.

Dear City Council:

At your joint meeting with the Planning Commission on July 19, 2000, I used the overhead projector to show you three views of Stanford lands.

If I had five minutes for my presentation on July 19, 2000, I would have showed you two other views of Stanford lands.

I showed you:

(1) "Golf Course Location Alternatives" from the 1971 Stanford University Land Use Policy/Plan prepared by city and regional

planners Livingston and Blayney.

- (2) "Figure 16: Recommended circulation plan -- long cul-de-sacs" from the August 1987 Foothills Region Plan -- Phase 1 prepared by the Stanford Planning Office.
- (3) An aerial photograph of Stanford lands that demonstrates the relationship between Stanford foothills lands in Palo Alto and unincorporated Santa Clara County.

These three views of Stanford foothills are included in your agenda packet for the July 31, 2000, City Council meeting a few pages from the end of the stapled together correspondence for this agenda item, between the testimony of Dan Logan and the letter from Micki Schneider and Lanie Wheeler.

- If I had additional time for my presentation, I would have showed you two other views of Stanford lands that you had previously seen:
- (4) "Current Land Status" from the 1971 Stanford University Land Use Policy/Plan that depicts which land at that time was "Alienable Land Not Leased".
- (5) Map L-2, "Sphere of Influence & Urban Service Area" from the 1998-2010 Palo Alto Comprehensive Plan.

This letter provides more information about those four figures and one aerial photograph.

GOLF COURSE LOCATION ALTERNATIVES

The 1971 Land Use Policy/Plan, in land use plans facing pages 16 through 20, and facing page 28 showed five possible locations for the Stanford Golf Course:

In Alternative A, "The seven holes of the golf course north of Junipero Serra Boulevard were relocated adjoining the present course, and the land made available was earmarked for campus expansion."

In Alternative B, "The golf course was moved to land along San Francisquito Creek in Webb Ranch West, making t he site of the present course available for campus expansion." [Webb Ranch West is the area between Interstate 280 and the Jasper Ridge Biological Preserve.]

In Alternative C, "The golf course was relocated immediately south of the present site."

In Alternative D, "The golf course was left at is present location."

In Alternative E, "The golf course was moved to Interdale." [Interdale is the triangular area formed by Interstate 280, San Francisquito Creek, and Felt Lake.]

At page 28, the Policy/Plan states, "A decision to keep all or part of the present golf course and to add a second course would be consistent with the Policy/Plan."

The 1987 Foothills Region Plan identified a "potential Golf Course expansion or relocation" as one of the academic programs "which may require sites in the Region at sometime in the future":

"A feasibility study explored the potential for Golf Course expansion in the Region. This could be required in the future either for additional holes or the need to relocate existing holes because of University facilities expansion or the widening of Sand Hill Road. This study presented two options for this expansion. Either would carry fairly high development, environmental and opportunity costs. From this preliminary analysis, it seems likely that the best permanent solution would be to build an entirely new course at another site." (Foothills Region Plan -- Phase 1, pages 21-22.)

SANTA CLARA COUNTY GOLF COURSE DESIGN GUIDLINES

On July 23, 1996, the Santa Clara County Board of Supervisors adopted Environmental/Design Guidelines for Golf Courses and Standard Development Guidelines after receiving a recommendation from a Golf Course Guidelines Review Committee that included Julia Bott of the Sierra Club, Loma Prieta Chapter; Camas Hubenthal of the Committee for Green Foothills; and Craig Breon of the Santa Clara County Audubon Society.

A summary of the golf course design guidelines and a link to the guid elines is at http://www.sccplanning.org/psgolf.htm.

The table of contents and links to the various sections of the guidelines is at http://www.sccplanning.org/psgolf1.htm.

You may wish to review those guidelines to see if any of the golf course alternatives considered in 1971 are viable alternatives.

GOLF COURSE REGULATIONS IN SANTA CLARA COUNTY ZONING ORDINANCE

32-1 Stanford should be required to abide by the conditions for golf course development as set forth in Section 36-22, Golf courses and driving ranges, in Appendix I: Zoning, of the County of Santa Clara Ordinance Code, including the following:

"Medium scale agricultural areas: Golf courses and driving ranges may be permitted in medium scale agricultural areas as designated on the county's general plan land use map, must be found consistent with all of the following criteria:

(1) The proposed use is contiguous to a designated urban service area or includes an irrevocable offer of development rights for all lands between the use and the urban service area;

. . .

(3) A permanent open space easement is provided for the site of the proposed use;

. . .

(7) Facilities associated with the golf course and/or driving range shall be limited to those which serve golfers on the course or range (for example: locker and shower facilities, pro shop with incidental sales of golfing equipment, snack bar and maintenance operations). Such facilities shall not include restaurants, other retail sales, lodging, health clubs, or similar uses."

The current golf course and all land that could be used for a second or relocated golf course should be designated with the Medium Scale Agricultural land use designation, or assigned a new land use designation that has the same conditions for golf course development as the Medium Scale Agriculture land use designation.

FOOTHILLS CIRCULATION PLAN

My previous letters to you indicated that Stanford's Foothills Region Plan -- Phase 1 covered only the area between Junipero Serra Boulevard and the high ridge between that road and Interstate 280.

I recently reviewed the plan for the first time in several years and I need to correct my former statements.

The Foothills Region Plan -- Phase 1 includes all Stanford land in unincorporated Santa Clara County on both sides of the high ridge between Junipero Serra Boulevard and Interstate 280, but excludes the land south of Interstate 280 (the Felt Lake area and

the Interdale area) and excludes the land east of Page Mill Road (Stanford North and Stanford South).

Figure 16 of Stanford's Foothills Region Plan shows the recommended circulation plan for the foothills consisting of long cul-de-sacs.

"Summary. The long cul-de-sacs alternative (figure 16) is recommended as a guiding principle in the evolution of an in terior road network. Benefits of this alternative include: minimizing through traffic, maintaining site opportunities, minimizing cost and minimizing environmental impact. Over time these cul-de-sacs can be connected to provide greater connection if necessary." (Foothills Region Plan -- Phase 1, page 49.)

Figure 16 also shows how a realigned Campus Drive East would connect the main campus north of Junipero Serra Boulevard with the recommended circulation plan for the foothills.

Figure 20 of the Foothills Region Plan shows in detail the changes at Campus Drive East that are the same as the changes proposed in the current Stanford application before the County.

"Changes at Campus Drive East. Some changes will be necessary at Campus Drive East to accommodate the main Foothills access road in the future. The portion of Campus Drive East between Gerona Road and Junipero Serra Boulevard will need to be re-aligned eastwards to permit a normal 90 [degrees] intersection with Junipero Serra Boulevard (figure 20). From this intersection it is recommended that the road be extended as a 22 foot rural section (i.e., two lane, no curbs), following the topography to meet the present alignment of the service road which winds uphill to the Big Dish. ...

"There is no present intent or need to build this road until an academic program in the Region is sited which requires such access." (emphasis added) (Foothills Region Plan -- Phase 1, page 53.)

The Stanford University Land Use Plan -- 1980 in the map "Central Campus Land Use Plan: 1980-2010" at page 29 shows a realigned Campus Drive East as a "future road".

32-2 Stanford's General Use Permit application of November 15, 1999, at page 7 states that "Anticipated roadway changes include ... [r]ealigning Campus Drive East to form a "T" intersection with Junipero Serra Boulevard to provide a safer, calmer intersection."

This application is the first time that "safety" instead of develo pment has been given as a reason to realign Campus Drive East.

The Draft Environmental Impact Report contains no evidence that there is any safety problem at this intersection.

The realignment should be prohibited.

STANFORD FOOTHILLS LANDS IN PALO ALTO

32-3 The aerial photograph I provided you shows the relationship between Stanford's foothills lands in Palo Alto and unincorporated Santa Clara County.

The DC Powers site is adjacent to other alienable in the Felt Lake area.

Coyote Hill and the adjacent parcels in Palo Alto are separated by Deer Creek from Stanford North and Stanford South in unincorporated Santa Clara County.

Stanford's November 15, 1999, "Summary and Explanation" at page 28 indicates that the DC Powers site in Palo Alto is a potential faculty and staff housing site.

The DC Powers site has a Palo Alto land use map designation of Open Space ... Controlled Development, an obsolete PC -- Planned Community Zone District designation, and an expired use permit.

The City Council should initiate a rezoning of the DC Powers site to OS -- Open Space, which is the appropriate zone for the site's land use designation.

The "Summary and Explanation" at page 28 also indicates that "Stanford has no current plans to propose development" on "the parcels below the top of Coyote Hill".

Stanford should dedicate Coyote Hill and the adjacent parcels to permanent open space, including those parcels known as Parcel C (Coyote Hill), Lots 1, 2, and 3 (the western flank of Coyote Hill), and Parcel 1 (the parcel across Coyote Hill Road from Lot 1).

JASPER RIDGE BIOLOGICAL PRESERVE

32-4 The "Summary and Explanation" at page 29 indicates that Stanford is "considering some form of designation" for the long term use of Jasper Ridge as a biological preserve.

Therefore, Stanford should be required to agree to a 99-year conservation easement for the Jasper Ridge Biological Preserve.

LAND OUTSIDE URBAN SERVICE AREA ALONG EL CAMINO REAL

32-5 Palo Alto Comprehensive Plan Map L-2, "Sphere of Influence &

Urban Service Area" shows all of Stanford's 1989 County General Use Permit Special Condition Areas A and D outside the Urban Service Area, including the areas proposed along El Camino Real and along part of Stanford Avenue for housing in Stanford's current County application.

Palo Alto Comprehensive Plan Policy L-1 states, "Continue current City policy limiting future urban development to currently developed lands within the urban service area. The boundary of the urban service area is otherwise known as the urban growth boundary."

The paragraph following Policy L-1 states, "The City's Urban Service Area boundary identifies areas that may be developed during the term of this Plan."

The map of potential Housing Sites on page 34 of the Stanford University Draft Community Plan dated November 15, 1999, contains at least three designated areas (D and I, and part of E) that are located outside of Palo Alto's Urban Service Area.

These sites are also located in the historic arboretum created by Jane Lathrop Stanford.

Buildings in the arboretum, whether for housing, public schools, or some other use would cause a substantial adverse change in the significance of this historical resource as defined in Section 15064.5 of the regulations of the California Environmental Quality Act.

Buildings in this area also violate Palo Alto Comprehensive Plan Policy L-1 that limits building to the Urban Service Area and defines its boundary as the urban growth boundary.

The project approval should eliminate sites D, E, and I, and find alternate locations for the proposed housing, and the project approval should prohibit new buildings in the arboretum.

32-6 The Stanford University document "Summary and Explanation" dated November 15, 1999, at pages 7 and 8, indicates that the proposed 350 apartments for hospital rresidents and postgr aduate fellows on potential housing sites H and I could also be used for young faculty, that Stanford plans an early application for one of these two sites, and that Stanford has no target date set for building the second phase of that housing.

The document at page 8 also indicates that the proposed faculty housing on site E is likely to be postponed until after the addition of new housing at site C in Escondido Village.

The same document at page 28 indicates that the Pasteur Drive site in Palo Alto is a potential housing site for hospital residents.

Therefore, the project approval should require Stanford to first build apartments for hospital residents and postgraduate fellows on site H.

Stanford is currently building 628 apartments in Palo Alto along Sand Hill Road that are for faculty and staff.

These 628 apartments could be occupied by persons not affiliated with the university, but Stanford retains the right to claim all of these apartments for university-affiliat ed residents.

Therefore, the project approval should require Stanford to occupy all 628 apartments in Palo Alto with Stanford faculty and staff, and build on all other designated postgrad/hospital residents, faculty, and staff housing sites (Pasteur Drive site, and sites H, K, L, M, N, and O) before building housing on potential sites E and I.

The project approval should require Stanford to build student housing on potential housing sites A, B, C, F, G, and J, before building housing on potential housing site D.

ALIENABLE LAND

32-7 Page 4 of the meeting summary of the August 7, 1999, Community Forum on Academic Trends & Land Use records Larry Horton's response to Nonette Hanko's question about Stanford's alienable and inalienable lands. (The videotape of the meeting contains the complete question and answer.)

Horton confirmed that "The lands originally described as part of the Palo Alto Farm are inalienable."

I have previously provided you with a copy of the map "Current Land Status" that appears opposite page 3 in the 1971 Stanford University Land Use Policy/Plan.

This map shows that all Stanford foothills land from the high ridge south to Arastradero Road is alienable land, and fails to show the status of the land on the other side of Page Mill Road known as Stanford North and Stanford South.

The Land Use Policy/Plan at page 3 states that "A total of about 1,900 acres not included in the original grant from Senator and

Mrs. Leland Stanford is not subject to the restriction against sale. These alienable lands include 1,175 acres on both sides of the Junipero Serra Freeway embracing the entire Felt Lake — Interdale area, the General Telephone property on Arastradero Road [now called the DC Powers site], some steep acreage on Alpine Road in Portola Valley, lands around Searsville Lake, small portions of the present golf course in San Mateo County, and a parcel on the east side of El Camino Real in Menlo Park."

Note that these alienable lands include 1,175 acres in unincorporated Santa Clara County, or over 25% of Stanford's 4,017 acres in the county.

As much of Stanford's alienable land as possible should be permanently protected from future development, because it can be sold any time a majority of Stanford's Board of Trustees decide to sell it.

The most flexibility for Stanford's foothills lands (both alienable and founding grant lands) can be obtained by Stanford identifying clusters of foothills land for future development that equal ten percent of the acreage in the foothills, obtaining a vested right to develop in those clusters under current county zoning regulations, selling the remaining ninety percent of the alienable land to Palo Alto for park land, and selling ninety-nine year easements on the remaining ninety percent of the founding grant land.

Once development rights are vested in the clusters making up ten percent of Stanford's foothills lands, the remaining land would have no developm ent potential and, therefore, its dollar value for purchase would be within the means of public agencies.

For those lands that are protected by open space easement grant deeds, Stanford could at any time apply for a county resolution amending the grant deed to rearrange the location of the clusters set aside for future development.

Stanford's application identifies two regions, called the Foothills Region and the Lathrop Region, that together encompass a total of 2,244 acres, of which the Lathrop Region contains 154 acres that are designated for development.

Stanford should be required to designate clusters for development that total 224.4 acres (including the 154 acres in the Lathrop Region), or ten percent of 2,244 acres, and permanently remove the remaining 2,019.6 acres from development.

The Campus Report Supplement, Number 10, of April 6, 1970,

published by Stanford University contains a series of questions with answers provided by representatives of the office of the President, the Vice President and Provost, and the Vice Presidents for Business Affairs and Finance of Stanford University.

Following is Question 10 and the answer provided by Stanford.

"10. What about the recent survey in Palo Alto which showed that residents there preferred no further development in the Foothills?

"The survey was a door-to-door survey of 835 residents, two-thirds of whom said they would pay \$20 or more per family a year to preserve open space in the city."

"The question was a fair one because it assigned a value to a social need; that is, it did not simply ask if citizens preferred open land to developed land, leaving the landowner to subsidize that space for everyone else.

"If the majority of Palo Alto voters and their representatives in city government feel the same way, Stanford would be ready to explore ways to hold campus lands open.

"True conservation will come when the public finds the means to acquire land in a reasonable manner and set i t aside as permanent open space. This will require much work and public education, and should receive far more attention from those who earnestly support land conservation."

While we are waiting for Stanford to agree to permanently preserve its foothills lands as open space, Palo Alto should act now to properly zone Stanford land in case Stanford decides to develop that land.

You should rezone the DC Powers site from PC to OS, and prezone the 1,175 acres of unincorporated alienable land either OS or AC.

You should also recommend to the County that their General Plan text for Stanford be changed to reflect the fact that 1,175 acres of the 4,017 acres in the County's jurisdiction are alienable land.

NEW ROADWAY ALTERNATIVE

32-8 The Draft Environmental Impact Report analyzed a proposal to extend Campus Drive West to Alpine Road to bypass the congested intersection of Alpine Road with Junipero Serra Boulevard and Santa Cruz Avenue.

The July 18, 2000, staff report to the Menlo Park City Council at Page 28 notes that: "the projected traffic volume data presented makes evident that the analysis presumes none of the

east-west movements projected on Sand Hill Road through the Santa Cruz intersection without the extension would shift to the Campus Drive West-Alpine corridor if the extension were made. This is a completely illogical presumption that invalidates the traffic component of the analysis. It is evident that the traffic mitigation benefits of the extension would be considerably greater than indicated in the DEIR."

The same report at Page 49 notes that: "the DEIR analysis grossly overstates the potential adverse effects of the roadway extension component. ... If a more practical alignment were considered, it would be expected to cut the purported impacts of the component on grading, loss of oak woodland and annual grassland by two-thirds or more, and eliminate ridgeline lighting impacts. The purported growth inducing pressure s in the area traversed by the road is a non-issue that can be dismissed since the project applicant controls the entire area and can dedicate this area as Open Space as part of the CP/GUP."

The 1971 Stanford University Land Use Policy/Plan recommended extending Foothill Expressway from its present terminus at Page Mill Road to connect with Alpine Road about half a mile south of the Junipero Serra Boulevard-Alpine Road-Santa Cruz Avenue intersection to solve the problems of that intersection.

The proposed extension of Foothill Expressway would create an area for campus expansion between Junipero Serra Boulevard and the proposed extension that includes the currently proposed Lathrop Region, plus other land, that together total about ten percent of Stanford's foothills land.

If the golf course remained at its present location, the proposed extension of Foothill Expressway would be just south of the golf course, and an extension of Campus Drive West would intersect the Foothill Expresswa y extension at the southeast corner of the golf course.

Traffic from Alpine Road could then reach the main campus by using the proposed road extensions. (See the map, "Preliminary Land Use Alternative D" opposite page 19 in the Land Use Policy/Plan.)

ACCESS TO FOOTHILLS PARK AND STANFORD FOOTHILLS LAND

32-9 If Stanford faculty and staff residents want to have the right to enter Foothills Park they should annex their residential area to Palo Alto.

While the annexation process is taking place, Stanford can allow mountain bikers to use its foothills land, instead of directing them to the Arastradero Preserve.

Stanford has issued a Conservation and Use Policy for The Stanford Dish Area that it claims is based on the need to preserve the area.

If Stanford genuinely wanted to preserve the area it would permanently protect its foothills from development.

Stanford's application includes a realignment of Campus Drive East that would enable Stanfo rd to connect the realigned road to the service road to the Dish to facilitate development of the foothills.

That is the same service road that Stanford now says is the only place hikers and joggers can use in the Foothills.

The general community's sense of entitlement to use Stanford's foothills for recreation is a relatively new idea.

As recently as the 1987 Foothills Region Plan: "A pass available from the Office of Real Estate and Lands Management authorizes access for recreational use of the Region. Only persons holding a current Stanford I.D. are eligible for this pass which must be carried at all times while on the land." (Foothills Region Plan -- Phase 1, page 10.)

The areas shown as conservation areas in Stanford's application are the same areas shown in the Foothills Region Plan that noted that: "The same features which make these areas ecologically sensitive -- topography, drainage patterns and tree cover -- give these areas high development costs." (Foothills Regio n Plan -- Phase 1, page 38.)

The criteria used to select these "environmentally sensitive" areas excluded the visual features that were included in Stanford's 1980 Land Use Plan, where the most visible foothills areas had the highest sensitivity ratings.

Limiting development to the current main campus is a form of compact development that could work, because it is being advocated by those who want the foothills permanently protected.

New urbanizers who want Stanford to build taller buildings on the main campus don't say whether they want the resulting open spaces on the main campus permanently preserved or made available for additional urban development.

CORNELL PLANTATIONS

If you want to see how a university is able to manage open space areas that are permanently protected and that have open public access, visit the internet site of Cornell Plantations at http://www.plantations.cornell.edu,

"The Plantations' holdings include 3,600 acres in and around Ithaca, all open to the public. On or near campus are the arboretum and botanical garden (200 acres) and 500 acres of natural areas encompassing woodlands, trails, streams, and gorges."

Cornell Plantations also manages "2,800 acres of diverse natural areas that include bogs, fens, glens, gorges, wet and dry meadows, and open and dense forests."

"Situated not far from the main campus" is the Laboratory of Ornithology. The "laboratory's facilities include the Lyman K. Stuart Observatory, which overlooks a 10-acre pond and a bird-feeding garden, and the 200-acre Sapsucker Woods, a wildlife sanctuary with more than four miles of trails."

Thank you for your consideration of these comments.

Sincerely,

Herb Borock

Get Your Private, Free E-mail from MSN Hotmail at http://www.hotmail.com

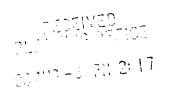
July 31, 2000 Santa Clara County of DEFICE . 6610 IVY Lane Planning Depter MIG-2 MIII: 37 San Jose, Ca Dear Sirs: Dask the Santa Clara County Planning Dept. to say No TO Stanford universities academic sprawh and to draw a "green line" at Junipero Serra Bulevard there by quaranteeing permanent protection of this open space. I have a lot of concern for this area of land know as the Dish and the Stanford Foothills. I have Togged and hiked on this land for many years of is one of the FINEST undeveloped pieces of land left on the Bay side of the Peninsula. The very idea of Stanford university of thirst for academic sprawl is repulsive. Some where Someone has to Just say no before business and academic interests have used up every Statch of recent land on the Peninsula And they would still be looking for more. the Peninsula area is still one of the finest places to live in this country. However, the development of its rich assets has taken much more away FROM the Peninsula than it has given it.

It Stanford University is allowed to Levelop
this land in the Foothills it would be
a manumental loss for all those for whom
the Peninsula area is home. You don't
have to walk on this land to benifit from
it's beauty - you sust have to look at it.
Those who do walk on this land understand
very well the treasure it is to this area.
A permanent green line at Junipers
Serra Boulevard is Necessary.
Series Douisouris is incessively
Respect fully yours,
nespect rang goars,
Jack Tobianen
Just 18 minus

County of Santa Clara

Roads & Airports Department

IOI Skyport Drive San Jose, CA 95IIO-I302 (408) 573-2400 FAX 44I-0I42





MEMORANDUM

DATE:

August 1, 2000

TO:

Sarah Jones, Planner III

Advance Planning Office

FROM:

Ashok Vyas

Land Development

SUBJECT:

Draft Environmental Impact Report (EIR) - Stanford University

FILE No.:

7165-07-81-99 GP 99P-99EIR

Your June 23, 20000 letter along with the Draft EIR entitled "Stanford University Draft Community Plan and General Use Permit Application" has been reviewed. Our comments are as follows:

- 34-1 1. Figure 4.4-6 shows study intersections. It is recommended that the Draft EIR study also include the intersections on Foothill Expressway and Page Mill Road, to assess the traffic impacts due to the project.
- 34-2 2. As stated on Page 4.4-90, Two County intersections i.e. Junipero Seera Blvd/Page Mill Road and Junipero Serra Blvd/Stanford Ave. will be significantly impacted. On Page 4.4-92, Tier 1 and Tier 2 Intersection capacity expansion have been listed. 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.
- **34 -3** 3. On Page 4.4-103, it is stated 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 has no authority to require improvements at this location. This improvement should be considered a Tier 2 improvement.

Sara Jones August 1, 2000 Page 2 of 2

The draft EIR's text should be corrected to state that the intersection improvement is within the county jurisdiction and the County has authority to require the implementation of the mitigation measures.

- 34 -4 4. Pedestrians cross Junipero Serra Blvd. at various uncontrolled locations between Stanford Ave. and Campus Drive. The draft EIR needs to address the impacts of traffic due to the project on pedestrian and bike-users.
- 34-5 5. We have enclosed an extract from "Junipero Serra Blvd. operational and Safety Study" Final Report dated December 1999. The draft EIR needs to address the concerns listed in the subject study.

Please call me at 573-2462, if you have any questions.

We thank you for the opportunity to review this matter.

Attachment

Cc: RBP, DEC, JME, MA, AKC, RVE & file

DKS Associates

ISSUES OF CONCERN

As outlined above, the majority of vehicles that use the JSB corridor travel at speeds in excess of the posted 35 mph speed limit. Excess speeds along JSB are believed to be the cause of most the traffic incidents, and thus are the source of the majority of the concern of residents and transportation officials.

The traffic issues prompted the following language to be included in the 1989 modification of Stanford University's General Use Permit, first granted to the University in 1962 (Section 5: Existing Conditions):

"Stanford shall convene regular meetings of a multi-jurisdictional group to address the existing traffic problems of volume, safety and noise on Junipero Serra Blvd. and Stanford Avenue. The group must include representatives from the Stanford Campus Homeowner's Association (Currently the Stanford Campus Residential Leaseholders), and may include representatives of the fifth County Supervisoral District, the County of Santa Clara, City of Palo Alto, and the California Highway Patrol. The objective of these meetings is to identify feasible solutions to the existing problems of the Junipero Serra Blvd. corridor and Stanford Ave., as described in the FEIR.

The existing traffic problems are multi-jurisdictional in nature; thus it is desirable that both the planning for solutions and the implementation of those solutions be fairly shared between all the responsible jurisdictions and parties. Stanford's annual reports to the Planning Commission will indicate the success or failure in addressing these concerns. The County Planning Commission, based on the conclusions of the multi-jurisdictional group may take appropriate actions to resolve these concerns, including requiring collaborative actions by the various jurisdictions and parties.

In addition, if traffic mitigations affecting Stanford Avenue or Junipero Serra Blvd. are triggered by either failure of the Transportation Demand Management system or triggered mitigations for approved projects, Stanford, with the participation of the multi-jurisdictional group, will evaluate the mitigations in the DEIR, and the additional noise and safety concerns they may cause, and determine if modifications or alternatives are preferable. In doing so, members of the group may help form solutions, comment on their feasibility, and participate in their prioritizing. This process will also facilitate the ability of participants to comment to the agency or agencies having jurisdiction over such mitigations."

Meetings held with DKS staff and Santa Clara County officials, as well as a public meeting including the Stanford Campus Residential Leaseholders (a community group), identified the following primary issues:

Safety. The JSB corridor is multimodal. It provides vital pedestrian, bicycle and
automobile access to the Stanford campus. The adjoining open space to the south of
the JSB corridor attracts pedestrians and bicyclists, who cross the arterial to access the
trails. Sections of the arterial provide the only access to and from some residences.
The relatively high speeds that characterize traffic along the arterial may create unsafe
conditions for these bicyclists, pedestrians and those entering and leaving residential

DKS Associates

driveways. Specifically, the residents expressed concern about the following safety issues:

- Driveway Access. Motorists travelling along JSB have difficulty recognizing the residences and their driveways, in part due to sight distance and vegetation, and also due to the character of the corridor. Residents view as dangerous the entrance and exit movements from and into their driveways, especially by those motorists that are using the driveways to make a U-turn.
- Illegal Movements. The residents have observed dangerous maneuvers along JSB, such as U-turns (which are prohibited), and vehicles entering the bike lane to pass on the right.
- Truck Traffic. The JSB corridor west of Campus Dr. East is designated as a truck route, while the eastern portion is not. Nonetheless, trucks have been observed along the eastern portion (where most of the residences are located), creating noise and safety concerns.
- Capacity. As stated previously, JSB is designated as a principal arterial, and is traveled by approximately 14,500 vehicles on an average day. It provides the only east-west access through the area between of Highway 280 and El Camino Real. Traffic volumes exhibit peaks in the morning and afternoon, indicating that the corridor is used by commuters. Maintenance of current capacity and efficiency are therefore important.
- Livability. Because the corridor receives medium to heavy bicycle and pedestrian traffic, and because of its proximity to the campus and to local residences, livability is an issue. Residents along the corridor desire a safe, quiet, and attractive area in which to live. High speeds along the JSB corridor tend-to increase noise and decrease safety.
- Cost. The implementation of any proposed improvements is limited by budget constraints and competing projects.

Identification of these criteria leads to the formulation of the objective for this study: to maximize safety and livability, while minimizing reduction of roadway capacity and minimizing cost.



"susan m. ivey" <sm_ivey@pacbel l.net>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Foothill Preservation

08/01/00 10:12 PM

35-1 We don't need another parking lot.

Sincerely,

Susan M. Ivey (SJSU)
Ted C. Herman (Stanford)



"Donald L To: sarah.jones@pln.CO.Santa-Clara.CA.US Nielson" cc: <don.nielson@sri. Subject: The Stanford Golf Course at Risk

08/01/00 09:55 AM Please respond to don.nielson

Dear Ms. Jones,

com>

Stanford planners are, I believe, entering into a land use alternative that they will come to regret later in this era that places increasing value on open space.

36-1 If, as its planners indicate, Stanford's long term goal is to have a golf course

as part of its athletic program, then the status quo is by far the least risky of the options now being discussed. Any plan that promises to relocate part or all of the present course will face a strong uphill battle over the conversion of any new location. May I remind you of earlier attempts to plan for golf courses in the foothills near Coyote Hill (near Page Mill and Junipero Serra) in Palo Alto and Edgewood Road in Redwood City, both of which were scrapped after strident opposition from environmentalists.

To use part of the present course for housing now with the chance of converting existing, more isolated open space to a new course later may well leave the University with a much smaller course that would not meet its or

anyone's golfing needs. Of the choices for land available for new housing, the Golf Course represents one of the greatest impacts on the signature characteristics of the University.

As a VP of SRI, I learned well the difficulty in bringing good staff to the Peninsula and I applaud the initiatives for this form of incentive. But I doubt that those new staff who would benefit would support the loss of one of the area's most well-known and remarkable vistas given the several alternatives. Just as the no-building zones at the entrance to the University clearly enhance its habitability, park-like interludes around the campus do so as well, even if it means higher density in selected areas.

Please don't put golf at Stanford at risk by a entering into a plan that would require land for a whole new 18-hole layout somewhere to the west. It may never happen!

Respectfully,

Don Nielson



DanWagner@aol.c om

To: joe.simitian@bos.CO.Santa-Clara.CA.US, sarah.jones@pln.CO.Santa-Clara.CA.US

08/01/00 08:59 AM Que:

Subject: Stanford golf course

Dear Mr. Simitian and Ms. Jones,

I write to you as a Stanford graduate (1956, 1962) and member of the Stanford Mens' Club section. I attended a forum of the mens' and womens' golf groups with representatives of the University last week. The results of this discussion were very disappointing, primarily in that the University's representatives appeared to reject every alternative to siting housing on the first hole of the golf course. I believe there are potential, viable alternatives which will both serve the need for housing and protect a precious golf course and environmentally important area. I offer the following:

- 1. The Stanford Golf Course is a superb layout; in addition to its golf character it is often recognized as being one of the most thoughtfully-designed courses in its natural fit to the terrain. This golf course treats golf and the environment as thoroughly compatible interests. As I understand the "plans," removing and relocating the first hole is environmentally wasteful because it will require constant auto and golf cart driving simply to get from green to tee. There is no such requirement today. This is a walker's golf course.
- 2. Without crying wolf prematurely, it is very clear that the buildout direction starting with the first hole would impact San Francisquito Creek just past the second green. In my view even the development of the first hole is an unacceptable incursion on the land and wildlife it supports.
- 37-3 I hold the opinion that there are significant amounts of acreage closer to the campus proper which could well be redeveloped as high-rise parking and/or multi-story residences. By building or re-building up instead of increasing footprint the University would minimize its incursion on open land. In spirit this is the very same issue held by the environmentalists who protest potential incursion across Foothill Expressway.

Stanford's plans have the look of urban sprawl: use the land, it's cheaper and it is a course of lesser resistance. I strongly urge that Santa Clara County require Stanford to re-cast its plans, and commit to preservation of the golf course and its environment. Thank you.

Dan Wagner



"Gary Shade" <garyshade@emai l.msn.com>

08/01/00 12:02 AM

To: <sarah.jones@pln.CO.Santa-Clara.CA.US>

CC

Subject: Draft Environmental Impact Report (DEIR) for Stanford's

General Use

Dear Sarah Jones,

38-1 Regarding the DEIR, as a twelve year resident of the Bay Area, I urge you to act for total protection of the Stanford Foothills in accordance with proposals by the Stanford Open Space Alliance.

Sincerely,

Gary Shade Menlo Park



Nambuat@aol.com

08/01/00 12:42 PM

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Stanford University Draft EIR

Dear Ms. Jones:

- 39-1 I am sending you this message to document my dismay with the Stanford University Draft Environmental Impact Report and Community Plan and Use Permit Application. I am specifically upset with the University proposal to redesignate Golf Course lands from Open Space to Academic General. The current plan to build several hundred housing units on what is now the first hole is simply unacceptable.
- 39-2 The Stanford Magazine published in its July/August 2000 issue a letter which I wrote, criticizing the University's unwillingness to take a stand on behalf of open space. When I wrote this letter, I did not know that Stanford was preparing a Use Permit Application that ignores hundreds of acres closer to the campus center (much of which is paved over parking lots) in favor of permanently eliminating a popular recreational resource that also serves as a wildlife habitat.
- 39-3 The housing crisis is real, not just at Stanford University, but throughout the Bay Area. Quality of life, however, is vital for Stanford residents and the neighboring communities. I do hope that you and your colleagues will direct Stanford towards greater intensification of its current housing so as to accommodate more people on less land, while simultaneously preserving the environmental treasures over which it has stewardship. Once the Stanford Golf Course is gone, it will be gone forever.

Sincerely,

Charles N. Taubman 20658 Shelly Drive Cupertino, CA 95014 (408) 257-3251 nambuat@aol.com



"David E. Wilkins" <wilkins@ai.sri.c om>

08/01/00 07:55 PM

To: sarah.jones@pln.CO.Santa-Clara.CA.US, city_council@city.palo-alto.ca.us, joe.simitian@bos.CO.Santa-Clara.CA.US, hennessy@stanford.edu

cc: wilkins@ai.sri.com, dwilkins@ai.sri.com Subject: Stanford Golf Course

- **40-1** I believe Stanford's proposed development of its Golf Course would significantly detract from the quality of life here. The Stanford Golf Course is world-famous and a area-wide recreational resource in an area with too few golf courses.
- **40-2** Fred Templin and I have prepared a short report on the wild birds that use the golf course. I encourage you to read this report, which can be found on the web at:

http://www.ai.sri.com/~wilkins/golf/birds.html

Thank you for you consideration,

David E. Wilkins Ph.D. and Kathy Wilkins 1943 Camino a los Cerros Menlo Park, CA 94025-5209



sjaronson@webtv .net (Steven Aronson)

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC:

Subject: Stanford Golf Course

08/01/00 09:56 PM

I have lived in Palo Alto for 50 years and been a member of the Stanford Golf Club for 35 years.

41-1 Stanford's DEIR wants to reclassify a portion of the golf course from OPEN SPACE to a part of the core campus so that they can build in that area. This is particularly true of the first hole.

I know Stanford needs to build housing but to destroy a part of the famous course seems impractical. With all the "open" areas in the core campus there must be alternatives to ruining the course.

I don't know if you're aware of the fact that Stanford Golf Course has been considered in the top 100 courses in the U.S. several times. There are environmental reasons to save it as well as recreational ones. Over 34,000 rounds of golf are played by students, faculty and staff, which is almost one half of the total rounds played annually.

Please do not let Stanford do away with the golf course open space.

Steven Aronson 1914 Channing Ave. Palo Alto, CA 94303 (650)856-9625



"Tom" <tom@keelin.com To: <sarah.jones@pln.CO.Santa-Clara.CA.US>

CC:

Subject: Stanford's GUP and the Stanford Golf Course

08/02/00 12:42 PM Please respond to "Tom"

Hi Sarah.

As a holder of three Stanford degrees, as a former captain of the Stanford Golf Team (during the Tom Watson era), and as a Stanford-Palo Alto-Menlo Park resident for 25 of the last 30 years, I urge you to reconsider whether Stanford does indeed need to build on the first hole of the golf course in order to have enough housing to meet its needs. I believe Stanford's decision process has not been creative in its examination of alternatives, and that, as a result, Stanford's public position (in essence, "we've run out of land so we have no choice but to build on the golf course") is indefensible. Consider, for example, the following alternatives:

- Stanford's 175 acres of surface parking lots. Why not put in a few parking structures and free up, say, 100 acres for housing? (The first hole of the golf course is only 15 acres)
- Stanford's self-imposed planning guideline that "no new building should be higher than four stories." It is self-evident that this is inconsistent with good land-use planning in the face of such enormous development needs.
- Stanford's significant, untapped redevelopment and intensification opportunities (e.g Stern Hall, Wilbur Hall, Escondido Village) that should be exhausted before Stanford should be permitted to invade "Academic Reserve and Open Space."

So the issue about lack of space for housing is simply not credible. Moreover, there are a number of reasons overall why we should save the Stanford Golf Course. Please consider them and appreciate their importance.

- The County should encourage Stanford to increase the density of it's current and planned housing to accommodate more people on less land. We don't need more sprawl. The University owns hundreds of acres that are closer to the center of campus, not as environmentally and aesthetically sensitive as the golf course, and are better suited to urban development than the Golf Course.
- 42 -2
 2. It is environmentally wasteful to destroy certain holes on the Golf Course to rebuild them elsewhere, as Stanford plans to do. Saving the first hole would avoid forcing people to drive a half-mile during a round of golf. This would happen under the current proposal, which separates the proposed new first tee from the existing 18th green. Separating the beginning and the end of the course would waste gasoline and increase traffic and pollution in the area.
- 42 -3
 3. The Stanford Golf Course is an area-wide recreational resource in an area with too few golf courses. For over 70 years, it has benefited not only the University, but the mid-Peninsula, Northern California, and the world of golf. Crippling it, starting with the first hole and moving on to other holes later, would destroy that precious resource.
- 42 -4
 4. It is a world-famous, championship golf course, and the work of the great golf architect George
 Thomas. It is a jewel of a course that should not be tampered with. It has produced great golfers
 (Tom Watson, Tiger Woods, Mickie Wright, and others). It is a resource we all should be proud of
 and not one to dismember to satisfy housing needs that could be satisfied elsewhere.
- 42 -5
 5. With the San Francisquito Creek meandering along or through most of the first seven-holes, the course acts as a wildlife habitat for many species. It is a valuable buffer zone between the central campus and the Foothills. It should not be developed by should be designated as permanent open space.

I hope this all makes sense to you. If you disagree with anything I've said, please let me know. I would be happy to discuss it with you in person.

Sincerely yours,

Tom Keelin 1820 Oak Avenue, Menlo Park, CA (650) 321 1785 (home) (650 321 1872 (work) tom@keelin.com

GRADUATE STUDENT COUNCIL

ASSOCIATED STUDENTS OF STANFORD UNIVERSITY RECEIVED

201 TRESIDDER UNION • 459 LAGUNITA DRIVE #7

STANFORD, CA 94305

03 Min = 7 Millin: 34

August 2, 2000

Hand Delivered
Ms. Sarah Jones
County of Santa Clara
Office of Planning and Development
County Government Center
East Wing, 7th floor
70 West Hedding Street
San Jose, CA 95110

RE: Stanford University Draft Community Plan and General Use Permit Application,

Draft Environmental Impact Report

Dear Ms. Jones:

The Stanford Graduate Student Council (GSC) wishes to thank the Planning Commission and the County Supervisor's Office for their thought and concern in addressing the desperate need of graduate students for housing. We also wish to thank Stanford for initiating this process by asking for permission to apply to build this housing during the next use permit period. From the beginning of this process, Stanford has loudly and publicly told the community how concerned it is with responding to the calls for more housing by its graduate students, whose need for housing has gained near universal support from the entire community. We applaud the commission for proposing to hold Stanford to its publicly stated goals of solving the graduate housing shortage as mitigation for the ambitious expansion it plans over the next decade. We believe that this approach is the best way to ensure that the admirable goals that Stanford has promoted to the public and to its students actually get realized in completed construction of affordable housing.

Due to the housing shortage in the cities surrounding Stanford, especially in low cost rental housing, the demand by Stanford graduate students for affordable on-campus housing has grown rapidly. Graduate student income is currently less than half the HUD low-income designation for single individuals. The inability of the graduate students to survive in this market has motivated the GSC from its inception to advocate for affordable graduate student housing.

The GSC favors mechanisms that directly condition additional academic development upon construction of new graduate student housing. As Stanford has publicly acknowledged, its continued strength as a world class academic institution depends on immediately addressing the fundamental housing needs of its graduate students, who help maintain the university's excellence. This linkage is appropriate since Stanford's rapid growth combined with the low income of its graduate students creates hardships on the graduate students and impacts the surrounding communities.

Specifically, the GSC supports the mitigation conditions outlined in PH-3 (page 4.3-18 in the DEIR), but wishes to suggest some modifications that address the problem while continuing to support Stanford's needs as a thriving academic institution:

- 43-1 1) Stanford University plans for continued academic development should be contingent on a housing commitment of a net total of 1900 newly constructed *graduate* student units. We believe that these mitigation conditions should specify graduate student units as distinct from undergraduate units. This is necessary because historically Stanford has not needed encouragement in meeting undergraduate housing needs. Indeed for several years, Stanford has made a four-year guaranteed housing commitment to its undergraduates. We also believe specifying graduate student housing is appropriate since Stanford is projecting its student growth to be "virtually entirely" in its graduate population. This distinction would also be in keeping with the other distinctions made in this section that specify housing for faculty, staff, and postdoctoral units.
- 43-2 2) We recommend that this mitigation condition specify that this number of new units excludes any graduate housing construction initiated prior to the passing of the GUP. In addition, it should refer to actual new construction, rather than stuffing additional students into existing apartments.
- 43-3 3) As stated in the DEIR, the GSC believes the commitment should be as follows:
 - 500 newly constructed graduate student units within the first two years of the GUP.
 We believe it is important that these units actually be completed or under
 construction, rather than simply permitted in this time. We also believe that this
 commitment should be fulfilled before the permits for the GUP's first 500,000 square
 feet have been completed.
 - 500 additional newly constructed graduate student units within the four years of GUP approval. Again, we believe that this housing should be completed or under construction during this period, and that it should be built before the permit process for the first 1,000,000 square feet has been completed.
 - We agree entirely with the recommendation in the DEIR that 75% of the GUP graduate student housing construction be finished prior to completion of 1,500,000 square feet of academic development.
 - We also agree entirely that 100% of the GUP graduate student housing construction must be finished prior to completion of 2,000,000 square feet of academic development.

Additionally, the GSC wishes to emphasize two further points for consideration. First, we wish to ask that Stanford University and the County, in committing to build these new graduate student units, also commit in a meaningful and binding way to ensure that they are affordable to the graduate students that Stanford employs, many of whose limited income is determined by the university. Since the mitigations are intended to address the high demand for low cost housing by graduate students and to ameliorate the hardships caused on graduate students and the community as a whole, it is essential that the new units be affordable on a graduate student stipend.

Second, although the EIR states, "The net increase in graduate student housing proposed by the University will exceed the projected increase in student enrollment," we caution that that the current estimate of 1900 new units needed for graduate students is based on the current student population with zero growth. It does not factor in the projected increase of 683 graduate students over the next ten years. The current estimate assumes a constant demand for off campus housing by a fraction of the graduate student population. This demand is likely to grow if prices off-campus continue to increase. While it is too late in the process to propose any additional housing construction beyond that outlined above, we wish to emphasize how important it is that every one of these units be constructed as soon as humanly possible. We encourage Stanford to complete the construction of all these new units well prior to the deadlines suggested in the DEIR. We are encouraged by Stanford's stated commitment to housing, and sincerely hope that it will seek innovative solutions to address housing shortages that will inevitably occur after all these units are completed, as well as in the intervening years.

On behalf of Stanford's 7,500 graduate students, the Graduate Student Council, with active members from all seven academic units of the university, unanimously adopts these recommendations. In doing so, we also thank the Planning Commission, Supervisor Simitian, Sarah Jones, the surrounding communities and Stanford University for the commitment and initiative they have each taken to solve the housing crisis that has so substantially and adversely affected so many Stanford graduate students.

Adopted unanimously: August 2, 2000

Graduate Student Council

For further information, please contact Paul Hartke at (650) 723-5897 or email phartke@stanford.edu.

Cc: Supervisor Joseph Simitian Larry Horton

Regional Open Space

MIDPENINSULA REGIONAL OPEN SPACE DISTRICT

J 117 - 1 2111: 23

August 2, 2000

Sarah Jones Associate Planner Santa Clara County Planning 70 West Hedding Street, East Wing, 7th Foor San Jose, CA 95110

Re: Draft Environmental Impact Report (DEIR) for Stanford University Community Plan/General Use Permit

Dear Ms. Jones:

Midpeninsula Regional Open Space District staff has reviewed the DEIR for the Stanford Community Plan and have some very serious concerns about the completeness of the Plan and the adequacy of the environmental review with respect to open space and environmental resources.

In the Impact and Mitigation Summary (Table S-1) the DEIR finds significant unmitigated impacts under *Open Space, Recreation and Visual Resources* (OS-2 and OS-C2), under impacts on intersections in *Traffic and Circulation* (TR-5), and in two categories under *Historic and Archaeological Resources* (HA-1 and HA-C1). Review of the DEIR, and particularly the various alternative components, indicates that the Project also has significant impacts in conflict with land use policy (LU-1), on scenic routes and visual resources (OS-1, OS-4, OS-5, OS-6, and OS-C1), and on population and housing (PH-3 and PH-C3). In addition, avoidance of other significant impacts such as biological (most categories) and recreational opportunities (OS-3, OS-C3) depends on assumptions and mitigations that are not a part of the current Community Plan. The DEIR fails to recognize the cumulative impacts of Project alternatives that are proposed and/or likely to occur, such as a new connector road, a new school site, and relocation of a portion of the existing golf course, all of which would impact existing open space.

Table 3-1 on page 3-3 indicates Project consistency with the Santa Clara County General Plan Policy R-LU 68 on the Academic Reserve and Open Space Lands. The Policy states that "These lands are important for their scenic beauty, visual relief, grazing, and wildlife values, as well as their academic potential." The project is found to be consistent "with the exception of the golf course and research uses south of Junipero Serra Boulevard (JSB), and a portion of the Arboretum . . ." The Project is also found to be consistent with Policy L-1 of the City of Palo Alto General Plan, as presented in Table 3-3 on page 3-7.

These findings of consistency do not take into account the likely (as announced in the press) Project alternative of relocation of the portion of the golf course north of JSB to



Sarah Jones July 31, 2000 Page 2

- 44-2 currently undisturbed open space areas (see Impact OS-3 on page 4.2-21). The findings also do not account for the likely impacts of the proposed new school site. Although not designated in the Community Plan, the new school site proposed by Stanford, which is required to mitigate Project impacts on local schools, is also in the Open Space and Academic Reserve at Page Mill and Deer Creek Roads (see Table 7-3 on page 7-48). The fact that the site is not specified in the Plan does not mean that the primary open space impacts, and secondary biological and recreational impacts, of the proposal are avoided.
- 44-3 Similarly, the alternative of construction of a new road through the open space (see section 4.4F on page 4.4-84) has not been considered in the findings of consistency of the Project with open space policies. This is in spite of the fact that the Traffic and Circulation studies conclude that this road would be badly needed to relieve significant unmitigated traffic impacts of the Project on Sand Hill Road, Alpine Road and other roads and intersections.
- Also, the DEIR does not address the cumulative impacts of the currently proposed Carnegie Research Facility on open space in the Lathrop District. This project *must* be included as part of the Community Plan process to make any sense or use of the DEIR process.
- The inappropriateness of the findings of consistency with land use policy is underscored by the DEIR analysis regarding development proposed for the Lathrop District, on page 4.1-18:

"The proposed CP designation for the Lathrop Development District is Academic Campus, which is a change from the existing land use designation of Academic Reserve and Open Space. While the GUP only proposes 20,000 square feet of additional development, the CP designation would allow the consideration of future development that is consistent with the Academic Campus designation. Such future development could result in the need to relocate the golf course. Additional academic development in this development district would have the potential to conflict with natural resources protection and open space uses that are afforded in the surrounding area. In addition, access to this development district is currently limited, and would likely require additional capacity to accommodate additional development."

In spite of this statement, the DEIR finds that the Project is consistent with County

General Plan Policy R-LU 68 and Palo Alto General Plan Policy L-1. The DEIR also
finds that the impacts of development in this District are less than significant in terms of
land use. The rationale is that "potential effects and recommended mitigation measures
for open space and biological resources are addressed in their respective sections of the
DEIR" and: "it is anticipated that these uses could be provided in the development district
without conflicting with adjacent non-Stanford land uses because of existing buffers,

Sarah Jones July 31, 2000 Page 3

including portions of the golf course, San Francisquito Creek and Alpine Road." The conclusion is not supported by the analysis; further, findings in the Open Space and Biological Resources sections do not support these conclusions.

- The DEIR finds significant unmitigated loss of open space resulting from the Project (see page 4.2-20), and this does not take into account the cumulative impacts of Project alternatives and other projects outlined above. The Biological Resources section of the DEIR, beginning on page 4.8-1, finds that Project impacts on many critical resources, including the endangered California Tiger Salamander, can be mitigated to a less than significant level only by extensive creation of new habitat and native vegetation in remaining open space areas, along with careful monitoring, protection, and pro-active management. Yet, the Project does not include these measures, nor does it contain guarantees that the remaining open space will be permanently protected, or provide the means to address the conflict between increased campus population, reduced areas for public open space and recreation, and use of the same areas for critical habitat mitigation. The DEIR does not recognize the difficulty of achieving full and permanent mitigation of biological and recreational impacts given these conditions.
- 44-8 The DEIR finds in Table S-1 on page S-5 and on page 4.2-15 that the Project will be consistent with Santa Clara County General Plan policies concerning scenic routes and will have no significant impacts on scenic resources of JSB, which is a County-designated scenic roadway. This is in spite of the finding that 38 acres of new housing will be built north of JSB, 20,000 square feet of academic space would be constructed on the south side of JSB, and two pockets of housing of 1 to 12 units and 2 to 18 units would be constructed on the north side of JSB. The rationale that there would be no scenic impact is that "a thick grove of trees screens view of the golf course from most viewpoints along JSB" and "any structure within 100 feet of JSB will be subject to design review as required by the County zoning ordinance." This level of analysis and these assumptions are not adequate to support the finding of no significant scenic impact.
- The Impact and Mitigation Summary does not include Growth Inducing Impacts; however, in Section 5.3, starting on page 5-5, the DEIR concludes, under Impact GI-1, that the project will have significant indirect impacts due to growth and concentration of population, which cannot be mitigated. This is in spite of the theory that the project includes housing components that will improve the local imbalance between jobs and housing. Under Impact GI-C1 on page 5-9, the DEIR clarifies that the indirect employment demand generated locally by the estimated 1000 academic and related jobs, and the additional local residents, would result in another 500 to 1000 jobs in service and support areas. Even if the jobs and housing being created at Stanford are assumed to match Stanford's current and projected needs, this indirect job creation (especially in light of the 1.3 million square feet of office, commercial, and retail space envisioned in other known and potential projects) will result in a net worsening of the local housing shortfall, and related transportation impacts. This relates to categories PH-3 and PH-C3 in the Impact and Mitigation Summary. Also, though the summary notes significant post-

Sarah Jones July 31, 2000 Page 4

- 44-10 mitigation impacts on local intersections, the DEIR traffic analysis does not evaluate the local and regional traffic impacts of this indirect growth.
- 44-11 In addition to failing to acknowledge the likely cumulative impacts of components of the Project, the DEIR in many instances is unable to describe the Project in sufficient detail to evaluate the impacts at all. Many of the findings of no significant impact are based on vague assumptions, on mitigations that are not included in the Community Plan, or are contradicted by the analysis in the DEIR. This demonstrates that the Community Plan proposal is entirely too vague to provide the basis for adequate community planning or environmental review. The proposal is still open-ended in terms of future use of proposed Open Space and Academic Reserve lands, which makes it impossible for the DEIR authors to realistically evaluate or mitigate the ultimate impacts of the proposal.
- We strongly urge the County to require Stanford to provide a more detailed Community Plan that accounts for all of the land uses, projects (including the Carnegie proposal) and alternatives that are necessary to provide a complete and clear picture of what is to occur, and how the impacts are to be minimized. We urge that, based on a more complete Plan, the DEIR be extensively revised and expanded to fully address the Project and the impacts and mitigations. It is clear that this project will have major, unalterable impacts on the quality of life of the entire region. Stanford has the responsibility and the resources to do the best job possible. The County has the responsibility to make sure that Stanford follows through.

Sincerely

Kenneth C. Nitz. President

Board of Directors

cc: MROSD Board of Directors

Joe Simitian, Supervisor, Santa Clara County Luke Connelly, Palo Alto Planning Department

Planning Department, City of Menlo Park

meet you)

Diagnostic-code: smtp; 550

<"sarah.jones@pln.co.scl.ca.us;hennessy"@stanford.edu>... Relaying denied

---- Message from Schofield <pkevins@pacbell.net> on Wed, 02 Aug 2000 00:04:02 -0700

To: joe.simitian@bos.co.santa-clara.ca.us

cc: "sarah.jones@pln.co.scl.ca.us;hennessy"@sta nford.edu

Subje Stanford Community Plan/General Use Permit

ct: Plan Application

To: Joe Simitian

Re: Stanford University General Use Permit CC: Sarah Jones, Santa Clara County Planning

John Hennessey, Stanford University

Dear Mr. Simitian:

45-1 I write to object to the Stanford University General Use Permit in its current form. The specific provision that triggers this letter is the plan to further encroach on open space by converting the first hole of the golf course to housing. In the interests of full disclosure, I am an eighteen-year resident of Palo Alto, Stanford graduate and member of the Stanford Golf Club.

I finally decided to write because of the flawed process in developing and communicating the plan as well as concerns about the plan itself. We (members of the golf community) were specifically led to believe that the course was not on the endangered species list -- the University told the Golf Club as recently as March, 2000 that "... contrary to some rumors; the Athletic Dept. is committed to the golf course remaining intact."

This quote is directly taken from the minutes of a meeting of the Stanford Golf Club Board of Directors - 7 March 2000. At the time, the matter under discussion had to do with whether or not the 3rd and 4th holes would have to be modified because of possibility that Sand Hill Road may be widened, a possibility that has been known about and generally accepted for some time.

My point in including this quote is to argue that the golf community is NOT a rabid fringe group that opposes all change, but to highlight the lack of a documented, sustainable process. Given that the University has been clearly inconsistent, if not completely open, about the plan to members of its own community, I must question whether there are other surprises in the plan.

45-2 I acknowledge the difficulties in housing, recruiting strong faculty, etc. Somewhere in the thousands of acres, better alternatives must exist. It's hard to believe that the rate of change brought on by the internet age will not change the University and college-level education

in ways that are unimaginable. It's better for the University to figure out NOW how to deal with the physical realities of no new land than 10 years from now.

Mr. Simitian, please help make the plans better for ALL by rejecting the application until the University demonstrates a thorough, thoughtful process that convincingly reflects a clear balance of educational, economic, environmental and architectural integrity interests.

Respectfully yours,

Kevin Schofield 4107 Solana Drive Palo Alto, California pkevins@pacbell.net August 2, 2000

Mr. Ed Gawf Director of Planning and Community Environment City of Palo Alto

Dear Mr. Gawf:

Here are some examples of a type of problem found in recent DEIRs involving Stanford; It is relevant background. The July 31 city council meeting brought forth excellent points regarding the need for proper analysis of the CP/GUP DEIR. Analysis and comment by the city also requires proper care; please consider whether the noted problems might exist in the current DEIR in various sections. The certified EIR is very important because it will be used to prepare future CEQA analyses, not just as a planning document. Incorrect information will propagate.

46-1 The "Stanford University Escondido Village Graduate Student Housing" project Initial Study (April, 1999) states on p. 39:

"...East Campus Drainage Study to assess storm drainage capacity and flood hazards in the East Campus area. That report, expected to be completed in mid-1999..."

I asked Sarah Jones where the results could be found in the current DEIR analysis, and part of her July 19, 2000 response is:

"The drainage study was/is conducted by Stanford. You can contact them for a copy. However, I think the conclusions have not been finalized."

What's up with that? Do we need a "top ten" list of reasons why to certify the "Hydrology and Water Quality" section of the EIR with a missing study? The study is referenced (Shahabi) in the above document, but not mentioned in the current DEIR. Why would a study of such importance be delayed by more than a year, and why would the study not be mentioned in the DEIR?

- 46-2 Continuing with storm drainage, we learned the difference between detention and retention basins last Monday. I believe that there is already permanently standing water along Serra between El Camino and Campus Drive. Can the city take a look or should I take my own photographs, or should the DEIR analysis be accepted?
- 46-3 The current DEIR was prepared by the same company (Parsons) that prepared the November, 1998 "Stanford University Foothill Reservoir No. 2" Initial Study and Negative Declaration. The county approved the reservoir project without the university disclosing that it would be using 33% of the reservoir capacity (or about 2M gallons/day) for other uses. County Planner John Davidson replied on July 26, 1999 to my question about why daily use was not analyzed in the CEQA Initial Study:

"My reading of the project description is that the reservoir will provide adequate storage capacity for emergency situations. This does not preclude the reservoir from being used to provide water for everyday use."

I hoped the county would consider that it is a good idea to know what the real purposes of a project are before analysis.

46-4 The Carnegie DEIR was primarily prepared by CH2M HILL. The same company also prepared the 1994/95 Palo Alto "Wastewater Reclamation Program" EIR. The company accepted without verification false facts provided by Stanford on existing habitat. That project included an earlier attempt to construct a reservoir similar to "Stanford University Foothill Reservoir No. 2". I did not question why the Carnegie project had to have 20 acres for a 20,000 sq. ft. facility and parking spaces in my letter commenting on the DEIR. Maybe they low-balled the acreage. I didn't question why such a low use project required a new access road (Vista) to pave over open space when the existing road is adequate.

The above information is public knowledge.

The university completely "replaced" their planning staff about 3 years ago. The current staff has a knowledge of past planning decisions and the area commensurate with their time on the job. Not to imply that Palo Alto, county and other planning staffs have no recent additions -- but, the whole staff?.

Sincerely,

John Baca

P.O. Box 18527, Stanford, CA 94309

650/473-0996

verdosa@hotmail.com

cc:

Palo Alto City Council, Frank Benest, Lisa Grote, Joe Simitian, Sarah Jones, Sylvia Donati, Terry Trumbull, Pria Graves

Get Your Private, Free E-mail from MSN Hotmail at http://www.hotmail.com



LornaWard@aol.c

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC:

08/02/00 10:38 AM

Subject: Stanford golf - 1st fairway

47-1 We are appalled to read that Stanford is planning to delete the first hole of their historic golf course. We are not golf members at Stanford but the public always considers the course, Hoover Tower and "the Barn" as part of our heritage. Surely there is a way to avoid destroying a beautiful green expanse in order to build student/faculty housing.

There must be a alternate course to take. There is such an expanse of dry unsightly fields belonging to Stanford . Please reconsider your decision.

Bill and Lorna Ward 18 Stadler Drive Woodside, Ca 94062



"Cheryle Gail" <cheryleg64@hot mail.com> To: sarah.jones@pln.CO.Santa-Clara.CA.US

Subject:

08/02/00 08:34 AM

48-1 I'm sick that our community will be unable to have picknicks, gatherings, dogs at the dish, without these things we are not a community, how can we be? where do we gather? We need space to be free, without it we will deteriate into nothing good!!!

Get Your Private, Free E-mail from MSN Hotmail at http://www.hotmail.com



Mike McTeigue <mcteigue@pacbel

I.net>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC:

Subject: save the stanford golf course

08/02/00 11:13 AM Please respond to mcteique

Dear Sarah

I am opposed to changing the stanford golf course for all the reasons mentioned by everyone opposed to Stanford's draft EIR. My special reasons are the following

- 49-1 1. It is famous landmark, at least as important as Hoover Tower, the quad or the Oval. In fact, I'd argue that many prospective students at the medical, business and law graduate schools pick Stanford over Harvard because of the weather and the golf course!
 - 2. It is the beautiful last work of a famous golf architect.
- 49-2 3. It is a natural habitat, recognized by the Audibon Society
- 49.3 4. The plan to change it is half-baked, at best.
 - 5. The University has plans to destroy the first seven holes, with no comprehensive plan to replace this lost jewel.
 - 6. The University offered us no chance to participate in the planning prior to submitting the draft ${\tt EIR}$.
- 49-4 7. The proposed plan will increase traffic and congestion.

I entreat you to seriously consider making the Stanford Golf Course a permanent open space.

Thank you for your attention to this vexing matter.

Michael McTeigue, Stanford MBA 1985



- winmail.dat



"Barbara To: sarah.jones@pln.CO.Santa-Clara.CA.US
Dawson"

(

d@mindspri Subject: Draft Enviro Impact Report

ng.com>

08/02/00 08:22 PM

Dear Planning Commission Members,

Through the EIR study and public comment periods, one of the arguments used by Stanford and its supporters has been that Stanford is the engine for community prosperity.

In large part, this is true. However, Stanford cannot claim to be the engine for local growth without accepting the responsibility for the adverse impacts of that growth.

Stanford suggests that it is Palo Alto which has planned poorly, although the main promoter, developer and beneficiary of this planning has been Stanford. The Stanford Research Park, the Stanford Medical Center and the Stanford Shopping Center are all projects driven by Stanford. Consequently, Palo Alto has permitted too many jobs to come into town for which there is insufficient housing locally.

All organisms have an optimum size and cease growing when that size is reached, except for cancer. We would agree that a 16 foot tall man, a 3000 pound dog, or a 25 foot high sunflower were all past their optimum stage, especially if they were continuing to grow.

Since the "engine" issue has been raised by Stanford, the EIR should study the optimum level for Stanford's development and density. Likewise, quid pro quo agreements should be studied. As Stanford has already used up all of the rights which come with its A-l agricultural zoning, the county could require Stanford to offer 50% of all the new apartments on Ohlone Field to staff, students and faculty in order to mitigate traffic.

A this-for-that agreement should be examined in exchange for allowing them to build additional structures in the core campus area. Stanford's profits each year are significant and tax exempt. They could well afford to make a greater percentage of Ohlone housing available at below market costs.

The County's right to regulate Stanford's development is clear. In fact, the Marguerite Shuttle was required by the County, not volunteered by Stanford. It is a simple and logical answer to part of a transit dilemma. We need to take a closer look at common sense solutions.

Barbara Dawson 2365 Emerson St. Palo Alto To the Santa Clara County Planning Commission;

- 51-1 We would like to make the following comments on Stanford University's application for expansion. In brief, it is much, much too large. They should not be allowed to build at all beyond the urban growth limit. If Palo Alto is responsible for providing utilities to them they should be
- 51-2 confined to those boundaries. The land beyond Junipero Serra should be kept as open space and permanently dedicated as such. It is not at all unreasonable to require this of Stanford. The citizens of the county have voted many times to tax themselves to buy open space lands and parks that are available to Stanford residents as well as all others. It is not too much to expect Stanford to dedicate some of their bequest for permanent open space. Anything less than permanent is not at all adequate. Palo Alto will not decide to build on Arastradero Preserve in twenty years; why should Stanford expect to consider this a meaningful offer.

Furthermore, Stanford has not negotiated in good faith in the past. When the Sand Hill Road development was being discussed they refused to state if there were any other building plans in the future. The day after the judge ruled that the suit by Menlo Park was not valid, the very next day, Stanford officials unveiled an extensive plan for building student and other housing. Admittedly, this is necessary and desirable but it was certainly known to them during the Sand Hill discussions. Future building should be confined to the core campus and not extend into the

- 51-3 foothills. An ideal place for student housing would be the Eucalyptus area near El Camino Real, near bus and train service. This would encourage some of the residents to live without cars or to use them less. The Eucalyptus have practically no wildlife value, are a fire hazard and not native to California. The new landscaping could be native oaks and shrubs to complement the few oaks that are in the area.
- 51 -4 Housing should be completed before any more academic expansion is allowed. They should be encouraged to build up rather than out and, if more parking is absolutely required, it should be structures rather than more acres of parking lots. Stanford has contributed greatly to the increased urban congestion, housing shortage, air pollution and traffic in the area. Before they are allowed to expand further they should make serious efforts to help solve these problems. The rapid growth in the area, which Stanford likes to take credit for, has created many problems that have not benefited the area. Stanford should help to solve them. Perhaps some innovative transportation alternatives should be explored; "vellow' bicycles that are available to anyone to ride, a car pool which is available to Stanford residents for a fee so that it is not necessary to own a car that is used only occasionally, more free shuttles. What ever the means, we should require no new car trips as part of the plan.
- 51-5 Four million square feet of new construction is simply too much and we hope you will not allow them to inflict this on the surrounding areas.

 More open space is needed for recreation and preservation of a beautiful

area. Stanford has steadily reduced the natural recreation areas on its lands. First Searsville lake was closed for public swimming and access. Then Lake Lagunitas was closed and the boathouse and swim area taken away. Now they are proposing to build on the golf course and the salamander habitat. Mitigation for the salamander should be completed and proven to be successful before any building is allowed. Preferably the habitat should stay where it is and the natural environment kept and the building be done somewhere else.

The 'TExas Vision" of a completely built up and commercial area should not be granted and we hope you will hold fast to the previous limit and allow only needed housing to help relieve the shortage by providing affordable space for students and staff.

Thank you.

Dr. and Mrs. George Gioumousis 992 Loma Verde Avenue Palo Alto



Peninsula Conservation Center Foundation

3921 East Bayshore Road Palo Alto, CA 94303 (650) 962-9876 Fax (650) 962-8234 info@PCCF.org

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August 3, 2000

re:

s: Santa Clara County Supervisors and members of the County Planning Commission

From: Peninsula Conservation Center Foundation Board

Stanford University Community Plan/General Use Permit/DEIR

Laurie Mueller Executive Director

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.....

52 -1

52 -2

52 -3

Peninsula Conservation Center Foundation Board Supports

Permanent Protection of Foothills Open Space

The Board of Directors of the Peninsula Conservation Center Foundation submits the following comments on Stanford University's Community Plan/General Use Permit Draft Environmental Impact Report (DEIR).

Our 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 Boulevard. In order to accomplish this, we support:

- A modification of "Academic Growth Boundary Alternative B," which wouldbring the boundary into conformance with the City of Palo Alto's Urban Service Boundary. Adoption of this boundary would also afford the best protection for the California Tiger Salamander.
- County staff's recommendation that Stanford lands outside the Academic Growth Boundary be designated "Open Space and Field Research," instead of "Academic Reserve and Open Space."

Stanford's daytime population density in unincorporated Santa Clara County already exceeds Palo Alto's daytime population by 40 percent. Since the University has already developed the land so extensively, expansion of the magnitude being proposed (adding 4 million square feet over the next 10 years) should only be permitted if it is offset by a commitment to permanent protection of the foothills.

Our secondary concerns, also central to quality of life for all of us who live in the area, are housing and traffic.

- We recognize the need for additional housing and academic facilities at Stanford. The housing proposed in the draft environmental impact report should accommodate the projected increase in faculty/staff employment and the postgraduate population; however it will not address the existing shortfall of housing for faculty and staff (p. 4.3-16-17). More significantly, the new development will exacerbate our area's low-to-moderate income housing crisis (p. 5-8).
- We believe that all future development on the Peninsula must be carefully planned to add no new commuter trips based on actual counts.

Comments on the Draft Environmental Impact Report

In general, we recognize that additional development will not come without significant impacts to open space, plant and animal communities, traffic, air quality, schools, and water. While we find the draft report does a fair job of identifying these impacts, we note several areas in which the significance is underestimated. We hope a final report will select alternatives with the fewest harmful impacts.

Loss of California Tiger Salamander habitat

The California Tiger Salamander is a federal candidate for listing as threatened or endangered under the Endangered Species Act. In 1998 a Management Agreement for the species was negotiated and signed by the California Department of Fish and Game, the U.S. Fish and Wildlife Service, Santa Clara County, and Stanford University. The current proposal for development in the Lathrop District far exceeds the expectations of that Plan.

The draft plan/EIR relies on proposed artificial breeding ponds to mitigate effects of development in the Lathrop Development District on the salamander's native habitat. However, construction of new breeding ponds is an unproven technique. In fact, experimental ponds that have already been constructed have failed to produce salamanders in both of the past two years.

Please note that the plan sets no standards for measuring success of this unproven mitigation strategy, and successful mitigation is not proposed as a condition for development to proceed. Under the current proposal, monitoring could continue for decades without showing any success.

In summary, reliance upon construction ponds or on "salvage of salamanders" cannot be counted on to reduce impacts on salamanders or to support terms of the California Tiger Salamander management agreement, under which new development should have "less than significant" impact on the species.

We believe that Stanford's inability to predict successful mitigation of significant impacts to salamander populations is a strong argument in favor of retaining open space protections in these animals' habitat. If Stanford is allowed to proceed with development as proposed, performance standards must be written and met before development proceeds.

Loss of rare, threatened, and endangered plants

52 -8 Similarly, with regard to the loss of rare, threatened and endangered plants, transplantation or substitution of habitat should be demonstrated to be successful for some reasonable period of time before mitigation is approved and development is allowed to proceed.

Future growth in the foothills; proposed new road west of Junipero Serra

The DEIR states, "The proposed land use designation (Academic Campus) for the Lathrop Development District would allow for much greater future development of this area in subsequent development proposals. The land use designation would essentially remove the open space protections afforded by the existing land use designation and GUP on the 154-acre Lathrop District."

The new road through the Lathrop Development District (Traffic and Circulation, section 4.4F) would clearly be a growth-inducing development, although it is proposed to mitigate increased traffic on Sand Hill Road and Santa Cruz Avenue. This is further reason to urge that the Academic Growth Boundary be set at the Palo Alto Urban Service Boundary.

New jobs and housing

52-10 The report states that proposed development will bring 1,000 new faculty and staff employees and as many as 1,200 new graduate students to the campus, and housing for these new members of Stanford's community is provided for in the plan. We are gratified to note the

PCCF p. 2 August 3, 2000

University's support of "linkage" between academic development and housing for faculty, staff, and students.

It is imperative that academic buildings and housing be given equal weight in the planning process. We urge inclusion of performance standards that would make construction of new academic buildings conditional upon completion of housing, so as not to worsen the area's current jobs/housing imbalance.

However, and perhaps even more significantly, the report also cautions,

"The implementation of the GUP may result in the creation of approximately 500-1,000 new jobs over and above those created at Stanford University. Many of these jobs will be in the service industry where pay scales would place the employees in the low- to moderate-income housing market. Based upon current inadequacies of low- and moderate-income housing supply, any increase in demand would exacerbate the existing supply problem. At this point, housing prices are so high that many higher income employees also find it difficult to find affordable housing. Implementation of the growth management policies in the Santa Clara County General Plan and proposed CP would help alleviate many of the related environmental effects associated with the growth inducement. The proposed mitigation measures will require Stanford to participate with the County and local cities in the identification of offsite housing sites and funding. However, because indirect employment generation will increase population and therefore, traffic and public services impacts, this impact is considered to be significant and unavoidable."

We find this impact on the County's already dire low-to-moderate housing supply problem to be significant and unacceptable. We urge amendment of the plan to include effective mitigation for low-to-moderate housing supply impacts.

Increased runoff and flooding

52 -11 The draft report variously estimates an increase of 39 or 60 acres of impervious ground surface. Clearly, storm runoff from all this pavement and roof surface area could contribute to downstream flooding. To mitigate this impact, the report proposes site-specific hydrology and drainage studies before commencing each individual building project, to be followed by construction of stormwater detention ponds and new ground water recharge facilities.

We request a determination of whether space will be available to mitigate all new runoff impacts in the east-of-Junipero Serra project area before the plan is approved. A final EIR should conclude that such sites are indeed available and consistent with building plans. It is critically important that we do not find ourselves in a situation where academic buildings can be built because plans accommodate hydrological concerns, but the housing is held back because there is no more space for stormwater facilities.

Traffic

52 -12 We have serious concerns about the significant, unavoidable impacts of the proposed developments upon traffic. We continue to urge inclusion of "no net new commuter trips" as performance standards in the plan and permit. Calculation of "no net new trips" should be based on actual counts, not on the formula involving housing and other factors, which is used under the existing GUP.

In addition, we urge 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.

960 Wing Pl. Stanford, Calif. 94305 August 3, 2000

Sent by FAX to (408) 288-9198

Sarah Jones
Santa Clara County Planning Office
70 W. Hedding
7th Floor
San Jose, Calif. 95110

Re: Comments on Draft Environmental Impact Report for the Stanford Community Planand General Use Permit

Dear Sarah.

This letter is written in response to Santa Clara County's Draft Environmental Impact Report (DEIR) for the Stanford Community Plan and General Use Pormit (GUP).

We live in the faculty residential area of the Stanford campus. As campus residents we are very concerned about the Traffic and Circulation portion of the EIR.

- The traffic mitigation measures proposed by the county generally involve widening roads, adding additional turn lanes on existing roads, etc. In many cases the "mitigation" measures appear to cause serious problems for the campus residential community. The county's analysis is incomplete because it does not adequately address the effect of these "mitigation" measures on our campus residential neighborhoods.
- A case in point is the proposal in Section 4.4 of the Traffic and Circulation section to add an additional turn lane on Stanford Ave. at the Junipero Sierra intersection and to add an additional traffic lane on Junipero Serra all the way between Stanford Ave. and the Page Mill Rd intersection. Our residence backs onto Stanford Ave. The quality of life in our residential neighborhood has already been seriously reduced by the county's creation of formal parking area behind our residence. It is imperative that the county acknowledge that the Stanford Ave /Junipero Serra area is a residential neighborhood and that traffic mitigation measures must not be undertaken at the expense of neighborhood preservation.

We request that the county:

- 53-3

 1) Insure that all traffic and circulation mitigation measures be undertaken in a manner that will respect and protect our existing residential campus neighborhoods.
- 53-4
 2) Thoroughly analyze and take account of neighborhood consequences of all proposed traffic "mitigation" projects to be considered in conjunction with the GUP and EIR.
- 3) Conduct a new noise study of the Stanford Ave./Junipero Serra
 Boulevard residential areas, and require appropriate mitigation to address cumulative
 conditions. At a minimum, the noise study should update the data for the seven locations
 for which baseline data is available from the 1988 acoustical study conducted by Vincent

Salmon, P.E. for the Stanford Planning Office in conjunction with the 1989 General Use Permit. The values for the points measured in the DEIR for this area (Table 4.12-1) suggest a deterioration from conditions at that time, when a Condition of Approval called for Stanford to work to improve conditions. Updated data for these points will also quantify the results of the noise mitigation work Stanford did carry out at the Page Mill Junipero Serra intersection, a potentially useful model.

Sincerely,

David B. Montgomery

Toby F. Montgomery

CC: Charles Carter, Assistant Director for Environmental and Community Planning, Stanford University Planning Office, Stanford University, by FAX to (650) 725-8598

Kathy L. Sharp, Executive Director, Stanford Campus Residential Leaseholders, by FAX to (650) 725-6075

Remarks to Santa Clara County Planning Commission Re. SU GUP DEIR Jeannie Siegman 550 Junipero Serra Blvd. Stanford, CA 94305

August 3, 2000

I've lived on the Stanford campus more-or-less continuously since 1961, but I would prefer to think of myself as a citizen of the larger community comprising the University and its neighbors. The process we have going here tonight is certainly a contrast to the way planning was done in that simpler time in the 60's. I have to say I don't envy the dilemmas you all face as planners, particularly if the issues get framed as golfers vs. housing, or more congestion vs. more asphalt.

The formal purpose of the hearing tonight is for the Planning Commission to hear the range of views of the public. But there is another possible outcome, a positive thing that may be beginning to happen — and that is that a few of the stakeholders here are listening to each other. And beginning to talk to each other. And if, out of that better understanding, even a few of the dilemmas can be partly resolved, then the community can be proud to have had a hand in crafting solutions, not just lobbying their particular agendas and leaving all responsibility on you all as planners to play Judge and issue a Verdict.

So this first part of my remarks is really directed not just to you, the Planning Commission, but also to those of you in the audience. Think about staying on after you've said your piece and talking with the other stakeholders. [ad lib at this point, since some special interests had already left].

- OK, that's the end of the sermon. The one other point I'd like to make tonight has to do with the Traffic and Circulation element. In trying to understand and evaluate the Hundred and Twelve pages of analysis of traffic impacts, the thing that jumps out at me most is the amount of new asphalt I do understand that the first line of recourse is Transportation Demand Management, but just in case TDM doesn't work out like we'd all hope, we'd better be sure we can live with the Tier 2 plans. As it stands, the EIR consultants have defined the Tier 2 mitigations entirely in terms of intersection enlargements, lengthening of turn lanes, etc. In one case, an additional turn lane on Stanford Avenue would feed into to a new receiving lane on Junipero Serra, and that lane would extend all the way to Page Mill, requiring a widening of Junipero Serra. So what starts out as an added turning lane becomes a widening of the road overall, with all the attendant secondary effects on bicyclists and pedestrians not to mention the traffic-inducing effects of the enlarged road on the surrounding circulation system.
- I've been told that this is a standard approach for an EIR analysis but my request to the County is to work on the final EIR make it much less prescriptive about how capacity increases are accomplished if needed. Instead of tying our hands now and maybe sentencing us to all this asphalt, how about requiring thorough analysis of alternative ways to increase capacity when and if these mitigations are triggered. Over the past few years, there has been a huge increase in real field experience with alternative designs, including roundabouts, median wait-overs for pedestrians, etc. We understand a lot more about when they work and when they don't, and exactly what kind of capacity and safety improvements can be expected in different configurations. I'd hate to be trying to plan some project today under a mandate set 10 years ago in the last EIR. I hope that you as planners can build in some more flexibility so that future projects will benefit from our full knowledge base at the time. The bottom line is: get rid of the prescriptive Tier 2 mitigations, and rewrite them in a way that's consistent with the traffic calming, bicycle friendly, pedestrian friendly, transit friendly, neighborhood friendly policies embraced not only by Palo Alto but also by the County in its own General Plan, not to mention the Stanford Community Plan.

THOMAS S. JORDAN, JR.

474 CHURCHILL AVENUE PALO ALTO, CALIFORNIA 94301 (650) 327-6034

61419-7 11 2: 23

RE:

Proposed Stanford University Community Plan/General Use Permit. Comments on Draft Environmental Impact Report dated

6/23/00.

TO:

Santa Clara County Planning Department

Attention: Sarah Jones, Planner in Charge of Project

70 West Hedding Street East Wing, 7th Floor

San Jose, CA 95110

FROM:

Thomas S. Jordan, Jr.

Palo Alto Resident

DATE:

August 3, 2000

SUMMARY OF COMMENTS

I. <u>Absence of Standard Regarding Stanford's Application</u>.

State law requires objective standards for population density and building intensity. Nothing in the DEIR regarding these standards or how Stanford's present or proposed development relates to them.

II. The Academic Growth Boundary.

DEIR did not study the *current* line in the County General Plan between Campus on one side and Academic Reserve/Open Space on the other.

III. Community Plan Definitions.

DEIR does not provide options for definitions of proposed land use designations.

IV. <u>DEIR Study of Alternative Legally Inadequate</u>.

DEIR analysis of 50 percent Project clearly wrong. Two other alternatives proposed.

V. <u>School Impact</u>.

DEIR can and should provide public information on actual impact regardless of state law requirement of finding of full mitigation.

VI. No Net New Commute Trips.

What authority for DEIR statement that County cannot require this of Stanford?

VII. County Policy Against Applicant Doing Its Own EIR Studies.

All factual matters and studies provided by Stanford or its employees must be independently verified by EIR firm.

THOMAS S. JORDAN, JR.

474 CHURCHILL AVENUE PALO ALTO, CALIFORNIA 94301 (650) 327-6034

RE:

Proposed Stanford University Community Plan/General Use

Permit. Comments on Draft Environmental Impact Report dated

6/23/00.

TO:

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Attention:

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70 West Hedding Street East Wing, 7th Floor

San Jose, CA 95110

FROM:

Thomas S. Jordan, Jr.

Palo Alto Resident

DATE:

August 3, 2000

I. <u>Absence of Standards Regarding Stanford's Application.</u>

A. Introduction.

55 -1

There are no standards stated in the DEIR against which the County can measure square footage, more daytime population and more parking. Stanford is simply asking for more. The DEIR is proceeding as though the County can simply say "yes," without reference to any objective standards based on (a) the County General Plan, (b) County zoning, or (c) the densities of the surrounding area (i.e., Palo Alto). This is wrong. It is not planning. It is bad policy. It is illegal.

The County A1 and A120S zoning that applies to Stanford's land in the County is for single family residential and agricultural use, with educational institutions permitted only under special use permit. There is a minimum lot size density stated in the A1 and A120S zoning ordinances for residential use and single family density stated for agricultural uses. A special use permit can allow an educational use in a residential/agricultural zone, but the use permit cannot increase the density allowed by the zone.

A county's general plan *must* contain a statement of the standards of population density and building intensity for each land use designation. Government Code § 65302(a). *Twain Harte*

Homeowners Association v. County of Tuolomne 138 Cal.App.3d 664, 698-99 (1982). Failure to state population density and building intensity results in the county's general plan being legally inadequate and the county being prohibited from issuing development permits to landowners.

B. Present County General Plan for Stanford Lands.

1. The DEIR does not state anywhere the population density or building intensity for Stanford lands under the *present* County General Plan.

QUESTION 1

2. What is the population density for Stanford lands permitted by the present County General Plan? the building intensity?

QUESTION 2

3. If the present County General Plan does not state either population density or building intensity for Stanford lands, please state that fact. Also, state the land planning consequences of your conclusion.

QUESTION 3

4. Relate the *present* and *proposed* population density and building intensity on Stanford lands to the standards set by the present County General Plan. If there are no such County standards set, on what legal authority has the County been proceeding in granting Stanford development permits in the past? On what legal authority can the County grant Stanford development permits in the future?

C. Present Zoning for Stanford Lands.

1. The DEIR does not state anywhere the population density or building intensity for Stanford lands under the present zoning.

QUESTION 4

2. What is the population density for Stanford lands permitted by the present zoning? the building intensity?

QUESTION 5

3. If the present zoning does not state either population density or building intensity for Stanford lands, please state that fact. Also state the land planning consequences of your conclusion.

QUESTION 6

4. Relate the present population density and building intensity on Stanford lands to the standard set by the present zoning. If there are no County standards set, on what legal authority has the County been proceeding to grant Stanford development permits

Page 3

in the past? On what legal authority can the County grant Stanford development permits in the future/

QUESTION 7

5. How many acres of Stanford lands are zoned A1? A120S? other zoning?

QUESTION 8

6. It is my understanding that A1 zoning, which applies to Stanford Campus, permits a maximum of eight residential units per net acre. How many total units is Stanford permitted under the present A1 zoning? How many total units does Stanford presently have? Can residential unit density be converted to nonresidential building density? At what conversation ratio? On what authority?

QUESTION 9

7. How does the County convert eight units per net acre in A1 to Daytime Population (which measure is expressed as a number of people), which measure the County currently uses to regulate Stanford population density?

D. <u>Proposed Community Plan (General Plan) for Stanford Lands.</u>

- 1. The DEIR does not state anywhere the population density or building intensity for Stanford lands under the proposed Community Plan.
- QUESTION 10
- 2. What is the population density for Stanford lands permitted by the proposed Community Plan? the building intensity?

QUESTION 11

3. If the proposed Community Plan does not state either population density or building intensity for Stanford lands, please state that fact. Also state the land planning consequences of your conclusion.

QUESTION 12

4. Relate the proposed population density and building intensity on Stanford lands to the standards set by the proposed Community Plan. If there are no standards set in the proposed Community Plan, on what legal authority can the County proceed to grant Stanford development permits in the future?

QUESTION 13

5. The two proposed "Campus Residential" land use designations do have a population density indication and, perhaps from that, a building intensity, but the other land use designations do not have any such indications. What are the population density and building intensity standards set for "Academic Campus"? Is any

Page 4

development at all permitted in "Open Space and Academic Reserve," "Special Conservation" and "Campus Open Space"? If so, how much?

QUESTION 14

6. What is the total increase in population density and building intensity for all Stanford lands from the present County General Plan to the proposed Community Plan? State this increase by reference to each of the Development District Boundaries shown in Figure 2-6 of the DEIR and by use of both charts and maps.

E. Proposed Zoning.

QUESTION 15

1. Has Stanford proposed new zoning under the proposed Community Plan?

QUESTION 16

2. If so, please indicate by chart and map what new zones are proposed for what land. The same chart should indicate acreage and increase in population density and building intensity.

QUESTION 17

- 3. If rezoning of Stanford land is premature at this time, indicate the zoning designations *available* to Stanford (upon application to the County) under each proposed land use designation. What are the population densities and building intensities of each such zoning designation available to Stanford?
- F. Population Density on Stanford Lands As Related to Comparable Population Densities of Palo Alto.
 - 1. The County has regulated Stanford land development since at least 1989 by setting maximum square footage, daytime population limits and parking space limitations. The current daytime population limit under the 1989 GUP is 33,905, and Stanford's current application is to increase the number by 2,201, to 36,106.
 - 2. The DEIR contains no comparison of Stanford daytime population to Palo Alto's daytime population. That comparison was expressly requested in my comments at the Scoping Hearing (see DEIR Volume II) and is necessary to evaluate the environmental burden that Stanford's past and proposed development is placing on the local environment.
 - 3. All of the significant environmental impacts found in this DEIR relate directly to population growth requested by Stanford. The

respective population densities of Stanford and Palo Alto need to be known to show the respective burdens each is placing on the local environment.

- 4. If the DEIR will look, it will find that Stanford's *present* daytime population is 30-40 percent greater than Palo Alto's and the *proposed* daytime population for Stanford will create an even larger gap between the two communities. If Stanford develops all of its land at its current density (there is no control in place or presently under consideration to prevent that), the Stanford density will be 250 percent that of Palo Alto's—all accomplished under A1 zoning for single family residential and agriculture.
- 5. All facts needed to make this comparison of Stanford density to Palo Alto density are known:
 - a. Stanford county lands 4,017 acres.
 - b. Stanford daytime population 33,905 moving to 36,106.
 - c. Palo Alto acreage 25.98 square miles \times 640 acres = 16, 627 acres.
 - d. Palo Alto official population 60,000±.
 - e. Palo Alto daytime population per ABAG 100,000±.

The daytime populations need to be checked and fine tuned (for example, the Stanford number excludes dependents and seems to undercount the "other" category) but should be computable without any delay.

QUESTION 18

6. What are the daytime populations of (a) Stanford County lands and (b) Palo Alto, expressed in people per acre? What are those daytime populations projected to be if Stanford's application is granted in full?

QUESTION 19

7. Since Stanford may request amendments to the County General Plan and to County zoning to permit further development in the future, what is the projected development densities for Stanford land in 2020 based on current County policies?

- II. The Academic Growth Boundary ("AGB").
- 55-2 A. Figure 7-1 of the DEIR shows the Academic Growth Boundary ("AGB") proposed by Stanford and two alternative AGBs.

Page 6

B. The DEIR did not study or comment on the most logical AGB, which is the line on the County's current General Plan between the Campus and the Academic Reserve/Open Space land use designations (also the A1 zoning and A120S zoning) running along Junipero Serra Boulevard northward to Campus Drive, then going north then west to Sand Hill Road. This is the current County General Plan line and should remain unless there is a persuasive factual showing of why the line should be changed. Stanford has given no grounds for making the change. Stanford simply said it wants to change. The other lines studied seem to have come forward as compromises to Stanford's request, but why should there be a compromise to a request that has no basis?

REQUEST FOR STUDY
QUESTION 20

- C. The current General Plan line is also the same (approximately) as:
 - 1. The present A1/A120S County zoning line.
 - 2. The Palo Alto UrbanService Line.
 - 3. The Palo Alto Urban Limit Line.
- D. The significant environmental impact on Open Space could be diminished by the alternative of maintaining the current General Plan line. The DEIR has not even studied the AGB line that most diminishes the significant environmental impact on open space.
- The DEIR has not stated clearly the increased development potential of moving the current General Plan line between

 REQUEST FOR STUDY Campus and Academic Reserve/Open Space. The DEIR must study this, quantify it and state it clearly.

REQUEST FOR STUDY QUESTION 22

F.

The AGB should be part of the Community Plan, and the legal consequences of the AGB should be stated in the Community Plan, as well as the effect of the AGB. The DEIR needs to state clearly the full range of options for the County to adopt as the consequences of the AGB. For example, one option that the County could adopt would be: no application for any development outside the AGB will be accepted for filing.

III. Community Plan Definitions.

55-3 A. The present County General Plan does not define the two land use designations that it uses for Stanford's lands sufficiently for public understanding. For example, the Carnegie Foundation (an educational research nonprofit) has filed an application to build a 21,000-square foot two-story office building with 40+ employees and

60 parking spaces on a newly requested 20-acre parcel in the hills west of Junipero Serra Boulevard on land designated in the County general Plan as "Academic Reserve and Open Space." The County is processing the application as though it were appropriate. Given that situation, what is the meaning in the *present* General Plan: of "Academic" (the public would think it requires use by Stanford itself or, at least, a school with teachers, students, librarians, exams and degrees, not a research facility), of "Reserve" (the public would think that the word "reserve" refers to that which is kept for use when the Campus is full, not whenever Stanford arbitrarily decides to use it), and Open Space (should mean *no* structures, not a landscaped two-story office building).

- B. The Community Plan contains terms that need clear definition to prevent the Carnegie situation from recurring:
 - 1. Open Space (both in the hills and in the campus).
 - 2. Field Research.
 - Academic Reserve.
 - 4. Special Conservation.

C.
REQUEST FOR STUDY
QUESTION 23

The DEIR should state the full list of options for the definitions of these land use designations. the public can then comment and the Supervisors choose. At present there is no adequate definition of General Plan land use designations and abuses have occurred.

- IV. <u>DEIR Study of Alternatives Legally Inadequate.</u>
- The DEIR looked only at one (the legal minimum) alternative project, namely a 50 percent Project, and concluded, without setting out a detailed analysis for the public, that the 50 percent Project had significant environmental impact also, so should be dismissed.
 - B. The DEIR dismissal of the 50 Percent Project is the clearest case I have ever seen of "legally inadequate analysis." Other DEIRs leave out topics that should be studied or omit facts or get facts wrong, but seldom does one see DEIR analysis so clearly wrong as to be clearly legally inadequate. The DEIR says that all levels of significant environmental impacts are the same, that losing one-half of your oak trees is the same as losing all of your oaks, that waiting at a road intersection through two stoplight changes is the same as waiting through four or six light changes. Clearly, there are significant differences among significant impacts. The DEIR is wrong.

C. Please drop that alternative project anyway. It was not the alternative to look at. The DEIR should look at either or both of the following alternatives:

REQUEST FOR STUDY QUESTION 24

Option 1: All of the housing and none of the academic (utilizing conversion of existing areas of the Stanford campus for all new projects).

Option 2: All of the housing and half of the academic.

Each will yield far better environmental results than the 50 Percent Project alternative. This time the comparative analysis should be set forth in a form the public can understand and evaluate.

- D. Note that the alternatives to the Project are the most important part of the CEQA process. The California Supreme Court has said: "The core of an EIR is the mitigation and alternative sections." *Citizens of Goleta Valley* 52 Cal.3d at 564.
- E. In studying the alternatives suggested above, look at the specific buildings Stanford is proposing. For example, Stanford wants a new basketball arena. Stanford has an 8,000+ seat basketball arena. Stanford says nothing about tearing down the old arena when the new arena is finished. That teardown could be a square footage credit against the new arena. When this approach is taken of looking at converting old space to new (which is what all of Stanford's academic competitors have to do), the County permitting none or one-half of the new academic space requested becomes very doable. The entire approach of looking at recycling space has been ignored by Stanford and the County. The purpose of the EIR is to explore these options.
- F. This raises the question of how is Stanford athletic space counted for square footage. For example:

QUESTION 25

- 1. Football stadium.
- 2. Two Olympic-size swimming pools, one 25-yard competitive pool and diving pool and related decking and buildings.
- 3. Tennis stadium.

V. School Impact.

55-5 A. Current state law requires an EIR to find that impact on local schools are mitigated upon payment of school impact fees, and this DEIR has so found.

B. This is a false statement of mitigation, but it is required by law. In this case, it is even more false because the 570± new students going to PAUSD from Stanford campus will pay nothing (\$0.00) to PAUSD each year. Stanford has the right, being within PAUSD boundaries, to send children living on campus to Palo Alto schools, but no taxes or share of bond payments are paid to PAUSD for their education.

question 26 statements of clarity requested

C. The law requires that the EIR make a finding of mitigation, but this situation requires a full disclosure to the public that this is a finding required by law and is not a finding of factual mitigation.

QUESTION 27 STUDY REQUESTED

D. The DEIR 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. The public has a right know this. The EIR is the vehicle to inform them. The mitigation finding required by law stands, but the actual facts should be stated as well.

VI. "No Net New Commute Trips"

DEIR page 7-57 states, in relation to "no net new commute trips," that: "although the County cannot require this of Stanford." No authority is cited. No analysis is given. On what basis does the DEIR make this statement? If this conclusion is based on a legal opinion given the EIR firm by Stanford or the County or the EIR firm's own staff, the public has a right to see the authority and reasoning so that a public rebuttal is possible.

- B. This is a major issue, because the 1989 GUP required "no net new commute trips" and the great weight of public comments (notably the cities of Palo Alto and Menlo Park) are insisting that this requirement be continued in the new GUP.
- C. My questions 3, 6, 12 above (and perhaps some others) ask the EIR firm to make statements based on basic land use law. Since the EIR firm was willing to give a legal opinion on Vol. I, page 7-57, it should be willing to answer *my* questions.

VII. County Policy Against Applicant Doing Its Own EIR Studies

55-7 Santa Clara County has a written policy against applicants doing their own EIR studies. Any information obtained from Stanford on factual

matters—whether it is wildlife studies on campus or traffic counts or whatever—must be independently verified by the the EIR firm.

QUESTION 28 The final EIR should contain a statement that the EIR firm is aware of this policy, has followed it, and that each factual statement from Stanford has been satisfactorily verified by an independent, qualified person who will accept signature responsibility for having verified the facts.

cc: J. Simitian, Supervisor
T. Trumbull, Planning Commissioner
Palo Alto City Council
Menlo Park City Council
L. Horton, Stanford University

August 3, 2000

Gerhard Casper President Stanford University Stanford, CA. 94305-2060

Dr. John Hennessy President-Elect Stanford University Stanford, CA. 94305-2060

Supervisor S. Joseph Simitian Santa Clara County Board of Supervisors 70 West Hedding St., San Jose, CA. 95119

Ms. Sarah Jones County Associate Planner Santa Clara County Planning Commission 70 West Hedding St., San Jose, CA. 95119

Re: Proposed Rezoning of Portions of the Stanford Golf Course

Ladies and Gentlemen:

I am writing this letter on behalf of myself and other new members of the Stanford Golf Course listed below to express our strong objections to the University s plans to redevelop the 1st hole of the Stanford Golf Course, and possibly holes 2-7.

The members listed below and I all have the following in common:

- We all joined the Stanford Golf Course within the past 12 months.
- All of us eagerly waited 13 or more years on the wait list for the chance to join a golf
 course that is unquestionably the finest university course in the world, and ranks with
 Olympic, San Francisco, Pasatiempo and the notable courses in Monterey as the finest in
 California.
- We all love this course because it is an integral part of our experiences at Stanford, and presents a great way to tie us regularly back into the campus. Knowing my golf membership was imminent, I, for one, became a life member of the Stanford Alumni Association, and will be getting involved in other ways on campus as well. In short, thanks to the golf course, Stanford is again becoming part of my life.
- All of us have paid or are paying \$50,000 to join the course on a non-equity basis despite a 250% increase in the fee charged the prior year.
- Neither the Athletic Department nor the University provided any of us any information
 whatsoever regarding the University s plans to rezone the golf course or to develop
 housing on any part of it.

VIA EMAIL

- We all believe that the University will never gain approval from the various competing interest groups to rebuild holes to be taken under this plan. The land that ostensibly cannot be found now to build additional housing will not somehow be available later to build replacement holes. Therefore, once holes are taken, they cannot be replaced at all.
- While we understand Stanford's desire to address housing issues on campus, we are certain other solutions such as alternate sites on campus and minimal increases in density are superior alternatives to destroying a precious, historical University asset.

With this in mind, we urge the County to deny Stanford's plans to modify or remove Hole #1 or any other portion of the Golf Course, and urge the University to find less destructive solutions to its housing concerns.

Best regards,

Rex S. Jackson Shirley Merrill David Obershaw Lynn and Olivier Pieron Good Evening, my name is Gerry Plunkett, my husband, Jim and I have teamed up together to ask you NOT to support Stanford's proposal to redesignate the Stanford Golf Course from open space to academic campus and not to support the building of housing on the first hole.

The FIRST HOLE, we consider, to be the signature hole and the golf course is a wildlife sanctuary, with many naturalized zones.

- These zones have been expanded and are connected together 57 -1 through what is called a "native corridor." We have the Great Blue Heron's that use these naturalized roughs to hunt rodents. Currently, there are 21 nest boxes for swallows, bluebirds, and nuthatches. There are also several dead trees along the course that are left standing where possible for bird colonization. The San Francisquito Creek borders a number of holes on the golf course and it's natural and heavily vegetated state provides excellent habitat for numerous species. The stream provides water and cover for animals venturing out on the golf course. There are also numerous birds, foxes, deer, bobcats, raccoons, covotes, and skunks living here. We believe this particular area is unique and should not be altered or destroyed in any way because of the important wildlife habitat it provides.
- besides it's environmental importance, Stanford hosts a variety of charitable golf tournaments, which benefit the community and the university. Nearly, every week there is a fund raising tournament held at the Stanford Golf Course. The Second Harvest Food Bank, The Breast Cancer Foundation, March of Dimes and The Ronald McDonald House are just a few who have all depended on the golf course to help in their fund raising efforts. I am very proud to say that over the past 21 years we have held the "Jim Plunkett Golf"

Tournament" and have raised nearly a million dollars. This has provided student athletic scholarships at Stanford for women's golf, women's volleyball and men's football.

So, as you can see, this Historical Golf Course is not only a sanctuary for the wildlife it is also doing a wonderful job in serving the community. It would be a terrible loss to ALL OF US if we destroyed this heritage. ONCE IT IS GONE, IT CAN NEVER BE REPLACED!

Before you make your final decision, I ask you to walk at least The First Hole, and than I'm sure you'll feel, as we do, and support us in our efforts to SAVE THE STANFORD GOLF COURSE! Herb Borock
P. O. Box 632
Palo Alto, CA 94302

August 3, 2000

Santa Clara County Planning Commission 70 West Hedding Street San Jose, CA 95110

STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT DRAFT ENVIRONMENTAL IMPACT REPORT, STATE CLEARING HOUSE # 1999112107

SANTA CLARA COUNTY FILE # 7165-07-81-99GP-99P-99EIR

Dear Planning Commission:

Thank you for taking the time to hold your public hearing in Palo Alto on the Draft Environmental Impact Report (EIR) for Stanford University's application for a Community Plan and General Use Permit.

The issues in this letter need to be properly addressed before you can recommend to the Board of Supervisors that they certify the Final EIR as complete and adequate.

RECOMMENDATION

Stanford University should be required to take the following actions as mitigations for any County approval of its application:

- 58-1 1. Initiate a rezoning of the DC Powers site from PC (Planned Community) to OS (Open Space), if Palo Alto has not already done that.
- 58.2 2. Initiate a prezoning of its alienable land in Palo Alto to either AC (Agricultural Conservation) or OS (Open Space), if Palo Alto has not already done that.
- 58-3 3. Permanently protect as open space Lots 1, 2, and 3 on the western side of Coyote Hill.
- 4. Analyze the effects of relocating the Stanford golf course to each of the alternative locations identified in prior Stanford planning documents.

- 58-5 5. Eliminate from the project the anticipated realignment of Campus Drive East.
- **58-6** 6. Permanently protect from development the open space created by the anticipated realignment of Serra Street.

STANFORD FOOTHILLS LANDS IN PALO ALTO

The relationship between Stanford foothills lands in Palo Alto and in unincorporated Santa Clara County is clearly shown in the color aerial photograph on the rear cov er of the document Summary and Explanation, Stanford University Draft Community Plan and General Use Permit Application, Submitted to Santa Clara County, November 15, 1999. (A black and white copy of that photograph is attached.)

The DC Powers site in Palo Alto is south of Felt Lake in unincorporated Santa Clara County.

Coyote Hill and the adjacent parcels in Palo Alto are east of Page Mill Road and separated by Deer Creek from Stanford North and Stanford South in unincorporated Santa Clara County.

Coyote Hill is surrounded on three sides by developed parcels in the Stanford Research Park in Palo Alto.

The attached map of "Governmental Jurisdictions" on page 26 of the November 15, 1999, Stanford University Draft Community Plan also shows the relationship between Stanford foothills lands in Palo Alto and in unincorporated Santa Clara County.

DC POWERS SITE

The DC Powers site is listed as a potential faculty and staff housin g site on page 28 of the "Summary and Explanation" document.

If Palo Alto does not rezone the DC Powers site before the adoption of the Community Plan and General Use Permit (GUP), then a mitigation for County approval of the Plan and GUP should be a requirement that Stanford initiate an application for a zone change of the DC Powers site from PC to OS.

In 1972, Palo Alto downzoned its foothills to the newly created OS (Open Space) zone district for all parcels except two parcels that had site-specific and project-specific PC (Planned Community) zone district designations.

One of these two parcels was the DC Powers site, which had a PC

zone district applied to it for a use that was demolished in 1986.

It is reasonable now to require that the DC Powers site be rezoned to OS to conform to other parcels in the area.

ALIENABLE LAND

The 1971 Stanford University Land Use Policy/Plan prepared by city and regional planners Livingston and B layney at page 3 states that land "not included in the original grant from Senator and Mrs. Leland Stanford is not subject to the restriction against sale. These alienable lands include 1,175 acres on both sides of the Junipero Serra Freeway embracing the entire Felt Lake -- Interdale area, the [DC Powers site] on Arastradero Road, ... "

Stanford's 1,175 acres of alienable land in unincorporated Santa Clara County constitute over 25% of Stanford's 4,017 acres in the county.

If Palo Alto does not prezone this alienable land before the adoption of the Community Plan and GUP, then a mitigation for County approval of the Plan and GUP should be a requirement that Stanford initiate an application in Palo Alto to prezone these 1,175 acres to OS (Open Space) or AC (Agricultural Conservation), unless the land is permanently protected from development as part of the County approval.

It is reasonable now to require that the alienable land be prezoned, because it can be sold any time a majority of Stanford's Board of Trustees decide to sell it.

COYOTE HILL

The attached map shows five Stanford-owned parcels in Palo Alto, including Coyote Hill, that have had Scenic Restriction Grant Deeds since the settlement of a lawsuit in 1972.

Stanford notified Palo Alto that it was not renewing the Scenic Restrictions on Lots 1, 2, and 3 that are between Coyote Hill and Stanford open space lands in the county.

A mitigation for County approval of the Community Plan and GUP should be that Stanford permanently protect the three lots on the side of Coyote Hill from development.

The three lots total 39 acres and are zoned AC, which means they

have little development potential, because the only permitted uses are agricultural uses or residential uses that are related to permitted agricultural uses.

It is reasonable to require that these parcels be protected from development, because they provide a buffer between the millions of square feet of developm ent on the Stanford campus and the millions of square feet of development in the Stanford Research Park.

GOLF COURSE ALTERNATIVES

The Stanford golf course has been identified as a potential site for housing in the Draft Community Plan.

The EIR must evaluate the effects of moving the golf course to provide space for the housing.

The 1971 Stanford University Land Use Policy/Plan identified four alternative sites for the golf course that are shown on the attached map that appears opposite page 28 of the Policy/Plan.

The environmental effects on each of these sites must be evaluated for each of two options: (1) relocating the golf course to the alternative site, and (2) building a second golf course at the alternative site while keeping all or part of the current golf course at the current site.

CAMPUS DRIVE EAST REALIGNMENT

Stanford University's GUP application of November 15, 1999, at page 7 states t hat "Anticipated roadway changes include... Realigning Campus Drive East to form a 'T' intersection with Junipero Serra Boulevard to provide a safer, calmer intersection."

The GUP application is the first time that Stanford has argued that a realignment of Campus Drive East is needed for "safety" reasons.

There is no evidence in the Draft EIR about the accident history at the intersection of Campus Drive East and Junipero Serra Boulevard.

The Final EIR must contain the accident history for that intersection and evaluate it according to recognized standards to determine if it justifies a realignment of Campus Drive East.

Attached is a copy of Figure 16 from Stanford's Foothills Region

Plan -- Phase 1 that shows the recommended circulation plan for development of Stanford's foothills.

Page 53 of the Plan states that the realignment of Campus Drive East will be necessary "to accommodate the main Foothills access road in the future", but "There is no present inte nt or need to build this road until an academic program in the Region is sited which requires such access."

A mitigation for County approval of the Community Plan and GUP should be that the Campus Drive East realignment be prohibited.

It is reasonable to prohibit the realignment of Campus Drive East, because it is needed only for development of the Foothills Region, and no development is proposed in the application for the Foothills Region.

SERRA STREET REALIGNMENT

Stanford University's GUP application of November 15, 1999, at page 7, states that "Anticipated roadway changes include ... Modifying the Serra Street alignment from Campus Drive East to El Camino Real to accommodate more landscape buffer at Escondido Village."

The Final EIR must contain a map that shows the anticipated realignment.

A mitigation for County approval of the Community Plan and GUP should be that Stanford agrees to permanently protect from development the landscape b uffer created by the realignment of Serra Street.

It is reasonable to permanently protect this area from development, because the applicant states that the purpose of the realignment of Serra Street is to create a landscape buffer.

Thank you for your consideration of these comments.

Sincerely,

Herb Borock

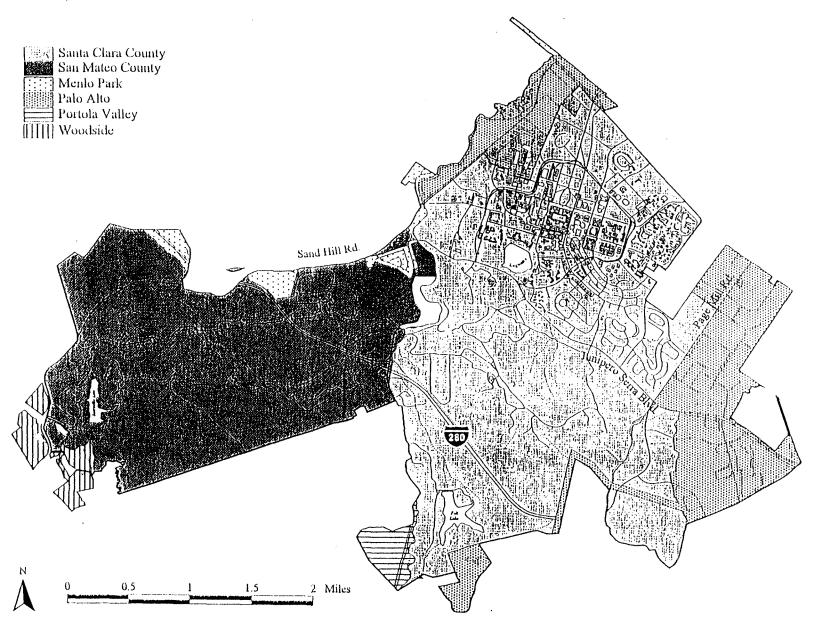
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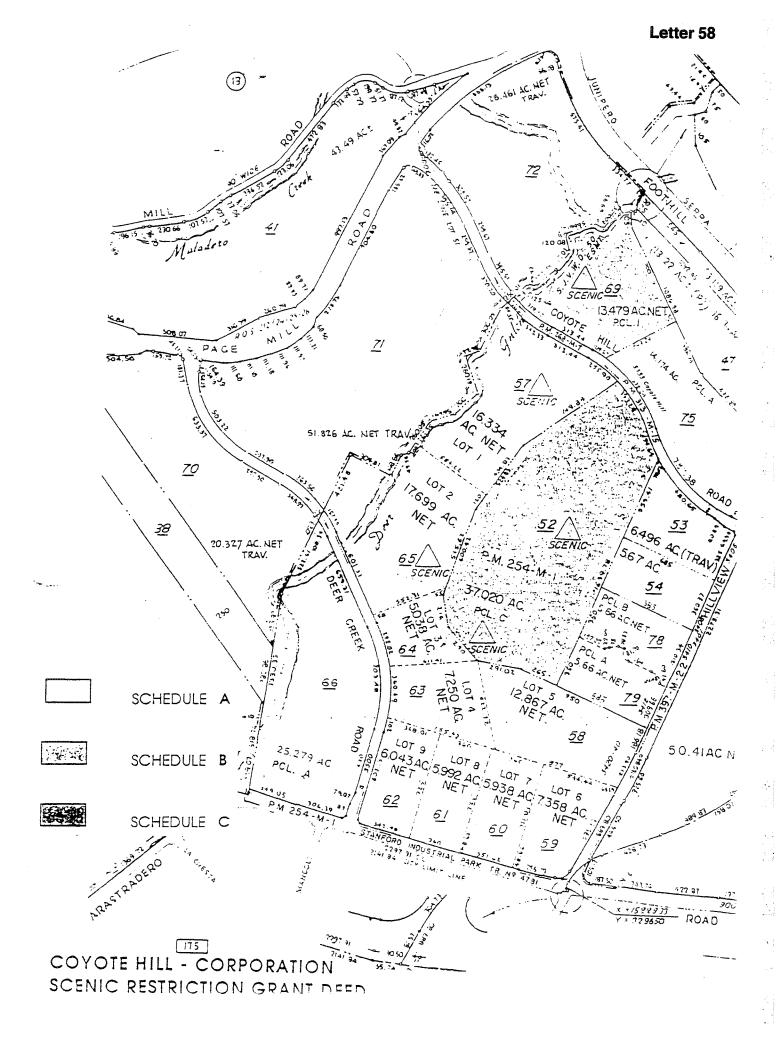
7.12.7.15.0 WOODSDE STANFORD UNIVERSITY LANDS: (8, 180 ACRES) AND SURROUNDING NEIGHBORS

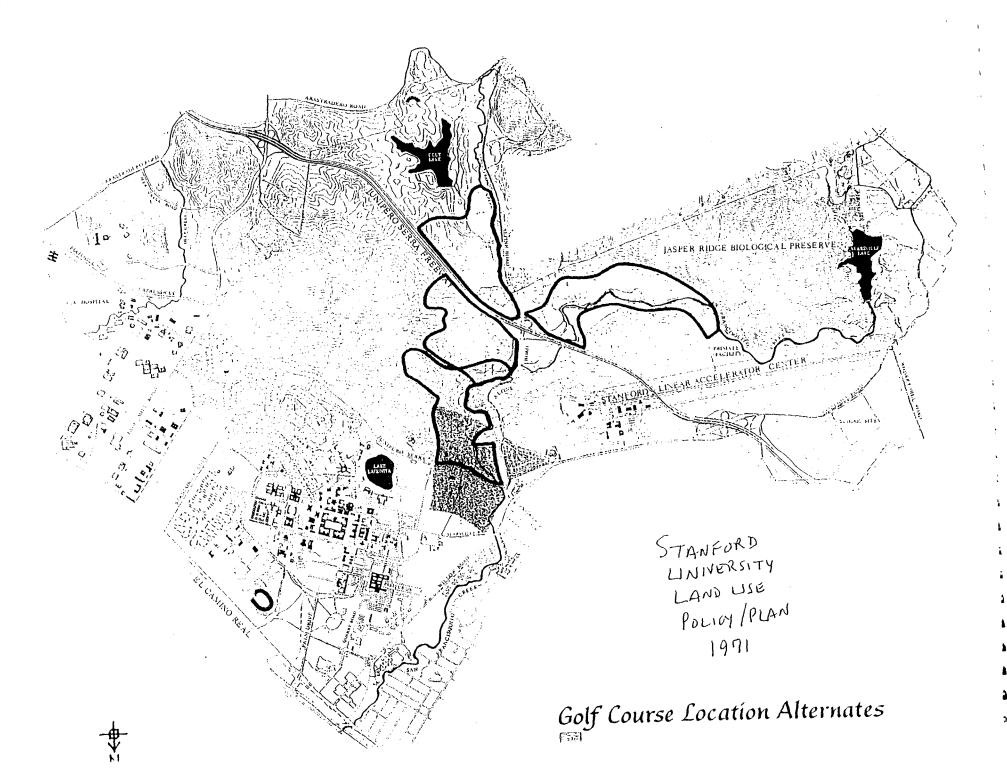
Stanford lands are located in the following jurisdictions:
Unincorporated Santa Claba County, Unincorporated San Mateo County,
Palo Alto, Menio Paric, Woodside, and Portoka Valley.

GOVERNMENTAL JURISDICTIONS



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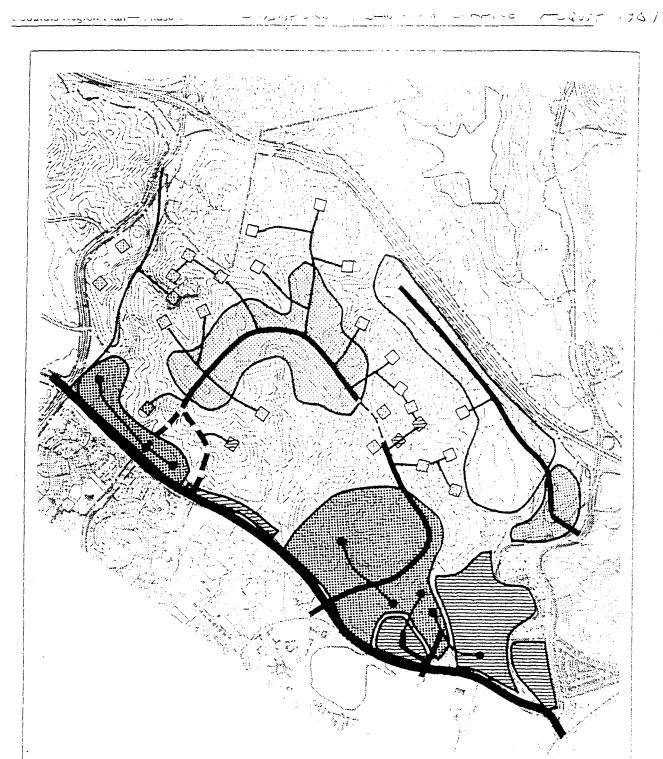


Figure 16: Recommended circulation plan—long cul-de-sacs.

1467 College Avenue Palo Alto, CA 94306 3 August 2000

Santa Clara County Planning Commission 70 W. Hedding St., E. Wing 7th Floor San Jose, CA 95110

Good People:

I live in the College Terrance neighborhood of Palo Alto. There is a common misconception about my neighborhood -- namely, that it is a "closed" neighborhood due to the traffic barriers on many of its streets.

College Terrace is not closed and thousands of non-resident motorists wind their way through our open streets every day, probably to avoid congested arterials. In addition, many trucks and SUVs ignore the barriers and enter our neighborhood at the street closures. We know, from studies and our own observations, that more than half of the traffic on certain streets, my own included, is "cut-through" traffic.

Attached to this letter is a map showing our neighborhood (marked with a green star) and how it is surrounded on three sides by Stanford land (the fourth border is El Camino Real). We believe that most of the cut-through traffic in our neighborhood is bound for either the Stanford Research Park or the central campus.

Even if Stanford achieves the laudable goal of no new net commute trips, the development they are seeking will have definite environmental impacts on our neighborhood. For example, Stanford is proposing adding 1,000 units of housing in their East Campus area (all of College Terrace, by the way, contains approximately 850 homes) in an area immediately adjacent to and bordering College Terrace. Regardless of how low the trip generation is by these new residents, we will still be significantly impacted. The residents of these homes will cut through our neighborhood; their visitors will cut through our neighborhood and the delivery trucks delivering all their Amazon dot com purchases will cut through our neighborhood – unless something is done.

The time is ripe for a comprehensive traffic study of our neighborhood followed by the implementation of traffic calming measures to mitigate the impact of Stanford's development.

Thank you.

Sincerely yours.

J. Paul Lomio

MENDOZMIII Carrillesina Universala

Editiona Valley

ROSALICATIONS

Staneord-University Lands-(8, 180 acres)
and Strrounding Neighbors

Stanford lands are located in the following jurisdictions: Unincorporated Santa Claba County, Unincorporated San Mateo County, Palo Alto, Menlo Park, Woodside, and Portula Valery.

MARY C. DAVEY 12645 LA CRESTA DRIVE

LOS ALTOS HILLS, CA 94022-2512

Phone: 650-941-0876 FAX: 650-941-3022

email: daveymob@ix.netcom.com

August 3, 2000

My name is Mary Davey and I am speaking as an individual. I am an elected official, Ward 2 of the Midpeninsula Regional Open Space District, a board member of the Peninsula Conservation Center and Midpeninsula Citizens for Fair Housing. An official letter from Midpeninsula Regional Open Space District concerning the DEIR is on its way to the County Planning Department.

Others will speak more specifically to the DEIR, my comments are directed to some basic principles that the Planning Commission needs to take into consideration before adoption of a Community Plan and the General Use Permit.

60 -1 I think it imperative that the County adhere to the Palo Alto Urban Services Boundary along Junipero Serra; this boundary includes the golf course at the corner of Junipero Serra and Alpine Road.

This means **NO** development beyond this boundary, including the proposed Carnegie Foundation facilities.

- 60-2 This means **NO** development on the golf course.
- 60-3 All the foothill lands north west of Junipero Serra should be protected as permanent open space and field research.
- Stanford is proposing 3000 + units of new housing for students, post docs, faculty and staff. This housing should be built within the University's core campus and 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.

Most of us in the community can support this large number of new housing units because Stanford is presently about 1400 housing units short of providing housing for the jobs that have been created on campus over the past ten years. With this in mind, Stanford should be required to build needed student, faculty and staff housing before any other development is allowed. The DEIR refers to "linkage"--a certain amount of housing to be built in relation to a certain amount of facilities built.

- I think the housing should come first, or at least be built within the first five years with a minimum amount of new job creating facilities linked to it.
- Now as to the proposed 2 + million square feet of new facilities. This is a massive amount of development which the midpeninsula cities and counties surrounding the University are just not able to accommodate. The traffic coming from the jobs created by this kind of development can not be mitigated. The DEIR admits this and no net new commute trips cannot solve the problem.
- 60 -6 Even half the proposed 2 million square feet is too much. I think it's time for the community to challenge this massive proposal and cut the requested square footage to a rational amount.

5 3100 ... m

PRESENTATION TO THE PLANNING COMMISSION SANTA CLARA COUNTY, August 3, 2000

Thank you for allowing me to appear before you this evening. My name is Lyman P. Van Slyke. I am a Stanford campus resident and for 35 years taught Chinese history at Stanford. I support much of the General Use Plan which is before you now. I DO NOT, however, support removal of the first fairway of the golf course for housing, and I do not believe such a step to be in the long-range best interests of the University.

I will address myself briefly to environmental issues. Prior to the August 7th deadline, you will receive extensive, detailed, and compelling evidence that the Draft Environmental Impact Report is inadequate and must be reconsidered.

The positive environmental values of the present golf course stand on four interdependent legs. (1) that the naturalized portions of the golf course are important to the
preservation of at least two endangered species—the tiger salamander and the red-legged
frog, (2) that the golf course, with its riparian corridor, is extremely bio-diverse, being
inhabited by many species of birds, mammals, insects, fish, and plant life, whether as
permanent residents or transients, (3) that the golf course is a crucial intermediary and
symbiotic link between the urbanized portions of the campus and the undeveloped open
spaces beyond it (of the ca. 160 acres comprising the golf course, only 85 are covered by
turf grass, the remainder being naturalized non-play areas), and (4) that the present golf
course management has vigorously and significantly improved the environmental quality
and ecological diversity of the golf course and will continue to do so.

The DEIR does not address or understand the damage that will be done by removing the first hole. On map 7-3 of the DEIR, a replacement area for the first hole and driving range is shown NORTH of Junipero Serra Boulevard, adjacent to Sand Hill Road. Meanwhile, Stanford planners write as follows: "....to fully utilize this site for housing, this hole must be moved to the golf course lands SOUTH of Junipero Serra Boulvard....The location of the hole and possible adjustments in other holes have not been determined."

This glaring disparity proves that no plan at all exists for reconfiguring the golf course, much less any assessment of the environmental impact of such reconfiguration. Reconfiguring a golf course is a complex matter. Like Rubik's cube, when you move one part all other parts must be moved as well. Removing the first hole will require a thorough redesign of the entire front seven holes at least, routing new holes through naturalized areas of the golf course, such as the heritage oak forests and grasslands which are prime terrain for the estivation of the tiger salamander. Removal of the first hole will transform a magnificent, historic, and environmentally valuable golf course into a mediocre and ecologically compromised shell of its former self.

On the other side of the equation, Stanford's Faculty/Staff housing needs can be addressed without removing the first hole. The GUP (p. 11) identifies six sites for such housing, upon which a number of units ranging from 326 to 700 are proposed. This very wide range clearly permits allocation of those units suggested for the first fairway to other parts of these very same sites.

We believe that the DEIR does not adequately address these various and complex issues, and should not be approved in its present form.

Dear Sarah, Members of the Santa Clara County Planning Commission,

Re: Draft EIR/ Stanford University GUP, Section iv, Traffic and Circulation

I am a resident of Palo Alto at 204 Cowper Street, which is on the north side of University Avenue, in the neighborhood referred to as "Downtown North".

- 62-1 We have noticed a marked increase in cut-through traffic in our neighborhood, a phenomenon borne out by a Traffic Study which was recently completed by the City of Palo Alto Traffic Division. This Traffic Study, carried out by a firm on independent traffic consultants, concluded that up to 70% of trips on neighborhood streets during commute hours were from cars cutting through our neighborhood, using it as a short cut between Middlefield Road and Alma Street, Palo Alto.
- 62-2 The volumes of cars comprising cut-through traffic were also considerable. As a result of this traffic, one of our neighborhood, residential streets was 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.
- 62-3 Although it is outside the scope of our Downtown North traffic study, I believe that the reason most people are cutting through our 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. These cars originate either in the East Bay, or close to 101, exit 101 at Willow Road and cut through Palo Alto's residential streets to reach Alma. This is self-evident to anyone trying that same route at commute hours.
- 62-4 There is no discussion in the EIR of the specific effects on Palo Alto's residential neighborhoods (specifically Downtown North) in the EIR, as a result of Stanford's development plans. There are vague statements such as there will be an increase in residential cut-through traffic. There is no consideration of how people who use 101 will reach the Stanford campus area to get to their jobs.

Let me fill in the gap: they will be cutting through our neighborhood because the residential arterial streets in Palo Alto are already at capacity!

A discussion of commute routes from 101 to the Stanford Campus is a glaring omission from the EIR.

Another glaring omission is any mechanism for compensating such neighborhoods for the damage caused by all this extra commute traffic. In the case of Downtown North, we think that Stanford University should pay for traffic calming or other mitigations since they are undoubtedly the major cause of traffic increases.

Please consider these omissions when deciding to ratify the EIR. I think it is very detailed on 280 / Stanford Campus commute routes, but extremely

thin when considering 101/ Stanford campus commute routes, which is where Downtown North is directly affected.

Sincerely,

Sally-Ann Rudd Vice President, Downtown North Neighborhood Association 204 Cowper Street Palo Alto CA 94301-1205

650 323-5920

sarudd@best.com

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Dear Ms. Jones:

It was nice seeing you at the meeting last night in Palo Alto. My name is Hank Lawrence AKA the "Tunnelman". I would like to present the following comments for the Santa Clara County Board of Supervisors consideration:

Subject: Proposed Road for Stanford.

Traffic on Menlo Park's side streets has increased in the past few years. This is due in large part to the increase in traffic going to Stanford. 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.

What Stanford needs to do is to take responsibility for its own traffic growth and stop mooching off its neighbors. The Santa Clara County Board of Supervisors should not approve any more 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 Highway 280.

- 63-2 The proposed route in the DEIR connecting Campus Drive West to Alpine road has several deficiencies. First, it impacts some endangered species. Second, it impacts Trancos Creek. Third, it promotes development in the Lathrop District, and lastly it creates a bottle neck at the I-280 Alpine Road interchange.
- The road I am proposing should have a large median strip capable of being converted to future traffic lanes as the Stanford Community grows. This road should not connect with Junipero Serra. The sole purpose of this road should be for Stanford traffic only. The Stanford Connector Highway interchange with I-280 should be built between Alpine and Page Mill Roads and the project should be complete by 2010. The connector highway needs its own interchange with I-280 to prevent the Alpine Road Interchange from becoming a bottleneck. The connector highway interchange should be constructed closer to Alpine Road than Page Mill Road but not so close as to cause traffic interference between the two interchanges.
- 63-4 The Santa Clara County Board of Supervisors should link future Stanford growth plans to milestone completions of the Stanford Connector Highway. If road construction falls behind then new permit approvals get delayed. Stanford expansion approval is locked in step with road construction progress.
- 63-5 Stanford also needs to be held accountable for other infrastructure concerns such as energy consumption, water consumption, sewage, air quality, thermal pollution, toxic and radioactive waste, and electromagnetic interference. We also need to study how Stanford

expansion affects the existing infrastructures supporting the neighboring communities. If PG&E has to build a new substation because of Stanford growth, then this new substation should be financed by Stanford in its entirety and not through general rate increases.

63-6 Serious consideration should be given to constructing a tunnel connecting I-280 to the Stanford core so that the hills west of Junipero Serra can remain undisturbed. The tunnel not only preserves the open space, it prevents air, noise, and light pollution. It also deters the University from using the road as a development corridor.

I realize this is an expensive undertaking but with \$3 Billion in cash the Stanford Land Management Company can well afford it. Leland Stanford called his school the "Farm" not the "City" and not "Manhattan West". The Stanford Land Management Company should propose a solution in keeping with Leland Stanford's dream. I believe it is fitting for Stanford to relieve its neighboring communities of the burden it has unfairly imposed upon them and pave the way for its future by relying upon its own property to expand its infrastructure and not the property of its surrounding communities.

Sincerely yours,

Henry E. Lawrence 2441 Sharon Oaks Drive Menlo Park, CA. 94025 (650) 854-0365 3 August, 2000

Ms. Sarah Jones County Associate Planner Sarah.jones@pln.co.scl.ca.us

Subject:

Stanford Draft Community Plan and General Use Permit Application Stanford Golf Course

Dear Ms. Jones:

It is my hope that Santa Clara County can control Stanford's sprawl. Stanford is in a unique position to be able to grow with less impact on surrounding communities since they can provide their own housing needs and consequently generate zero net traffic trips. They should be able to do this through denser development without consuming additional open space, including the golf course.

64-1 It is the opinion of some that Stanford's sprawl will reach highway 280 within 50 years. If they indeed can't be stopped, it will then be very clear that the taking of the golf course was a very shortsighted and wasteful loss of a much-needed recreational open space.

Santa Clara County has done a much better job of providing these kinds of facilities than has San Mateo County. Unfortunately, most new golf courses have been built in the southern part of Santa Clara County, leaving a severe shortage of golf facilities for residents of northern Santa Clara County and southern San Mateo County.

Very truly yours,

John R. Barksdale Stanford BA'66, MA'68 4151 Middlefield Road, Palo Alto, CA 94303

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Following is the text of oral communication delivered on 8/3/00 to the Planning Commission at their hearing in Palo Alto. Please include this as a comment on the Stanford CP/GUP Draft EIR dated 6/23/00.

Thank you very much, Jeannie Siegman

Remarks to Santa Clara County Planning Commission
Re. SU GUP DEIR August 3, 2000
Jeannie Siegman

I've lived on the Stanford campus more-or-less continuously since 1961, but I would prefer to think of myself as a citizen of the larger community comprising the University and its neighbors. The process we have going here tonight is certainly a contrast to the way planning was done in that simpler time in the 60's. I have to say I don't envy the dilemmas you all face as planners, particularly if the issues get framed as golfers vs. housing, or more congestion vs. more asphalt.

The formal purpose of the hearing tonight is for the Planning Commission to hear the range of views of the public. But there is another possible outcome, a positive thing that may be beginning to happen* and that is that a few of the stakeholders here are listening to each other. And beginning to talk to each other. And if, out of that better understanding, even a few of the dilemmas can be partly resolved, then the community can be proud to have had a hand in crafting solutions, not just lobbying their particular agendas and leaving all responsibility on you all as planners to play Judge and issue a Verdict.

So this first part of my remarks is really directed not just to you, the Planning Commission, but also to those of you in the audience. Think about staying on after you've said your piece and talking with the other stakeholders. [ad lib at this point, since some special interests had already left].

65-1 OK, that's the end of the sermon. The one other point I'd like to make tonight has to do with the Traffic and Circulation element. In trying to understand and evaluate the Hundred and Twelve pages of analysis of traffic impacts, the thing that jumps out at me most is the amount of new asphalt* I do understand that the first line of recourse is Transportation Demand Management, but just in case TDM doesn't work out like we'd all hope, we'd better be sure we can live with the Tier 2 plans. As it stands, the EIR consultants have defined the Tier 2 mitigations entirely in terms of intersection enlargements, lengthening of turn lanes, etc. In one case, an additional turn lane on Stanford Avenue would feed into to a new receiving lane on Junipero Serra, and that lane would extend all the way to Page Mill, requiring a widening of Junipero Serra. So what

starts out as an added turning lane becomes a widening of the road overall, with all the attendant secondary effects on bicyclists and pedestrians* not to mention the traffic-inducing effects of the enlarged road on the surrounding circulation system.

65 -2 I've been told that this is a standard approach for an EIR analysis* but my request to the County is to work on the final EIR make it much less prescriptive about how capacity increases are accomplished if Instead of tying our hands now and maybe sentencing us to all this asphalt, how about requiring thorough analysis of alternative ways to increase capacity when and if these mitigations are triggered. Over the past few years, there has been a huge increase in real field experience with alternative designs, including roundabouts, median wait-overs for pedestrians, etc. We understand a lot more about when they work and when they don't, and exactly what kind of capacity and safety improvements can be expected in different configurations. I'd hate to be trying to plan some project today under a mandate set 10 years ago in the last EIR. I hope that you as planners can build in some more flexibility so that future projects will benefit from our full knowledge base at the time. bottom line is: get rid of the prescriptive Tier 2 mitigations, and rewrite them in a way that's consistent with the traffic calming, bicycle friendly, pedestrian friendly, transit friendly, neighborhood friendly policies embraced not only by Palo Alto but also by the County in its own General Plan, not to mention the Stanford Community Plan.

SHUTE, MIHALY & WEINBERGER LLP

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LAUREL L. IMPETT, AICP

ELIZABETH M DODD

Via FedEx Next Dav

August 4, 2000

Sarah Jones, Associate Planner Santa Clara County Planning Office 70 West Hedding Street, East Wing, 7th Floor San Jose, CA 95110

Re: Proposed Stanford University Community Plan/General Use Permit, and Draft Environmental Impact Report Thereon

Dear Ms. Jones:

We submit this letter on behalf of the Committee for Green Foothills (the "Committee"), an organization dedicated to the protection and preservation of the hills, forests, creeks, wetlands, and coastal lands of the San Francisco Peninsula. This letter, along with the attached Biological Review we commissioned by Joe DiDonato of BioQuest, provides our comments on the Community Plan ("CP"), the General Use Permit ("GUP") (collectively referred to as the "CP/GUP" or "project") and the draft environmental impact report ("DEIR") for the project. We commend the County for undertaking this long-awaited and necessary planning effort toward regulating Stanford's land use development activities over the next decade. Unfortunately, however, the CP fails to meet the minimum legal requirements under the State Planning and Zoning Law for general plan elements, for it does not contain necessary standards for land use intensity and building density. These standards are essential in order for members of the public, and indeed, the County to understand specific development parameters within each of the applicable land use designations.

We have also closely examined the DEIR for the proposed CP/GUP, and find this document, too, fails to comply with state law, as it flatly contravenes several core requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, section 15000 et seq.) ("CEQA Guidelines"). Like all concerned

members of the public, the Committee relies heavily on the environmental document required by CEQA for an honest and thorough assessment of the environmental impacts of a project such as this. Because the DEIR for the CP/GUP is legally inadequate, decision-makers and the public are deprived of information they need in order to adequately assess the project's likely impacts.

Among its many flaws, the DEIR's project description omits fundamental information relating to the proposed Academic Growth Boundary, Stanford's ultimate development potential, and specific information about Stanford's proposed academic facilities. Without this information, it is all but impossible to accurately and effectively gauge the severity and extent of the environmental impacts that would result from implementation of the CP/GUP.

The DEIR also fails to properly identify the environmental impacts of the CP/GUP. This problem is best manifested in the document's truncated "analysis" of impacts upon sensitive biological resources. While noting that several federal and statelisted wildlife species of concern were observed within the project limits, the DEIR makes no attempt to actually analyze the project's impacts on those species. Instead, the DEIR excuses itself from this exercise, claiming both that the exact location and extent of development are currently unknown and that site-specific surveys were not possible. Incredibly, the DEIR does not even identify, let alone analyze, impacts upon the California red-legged frog, a "threatened" species under the federal Endangered Species Act. Moreover, the DEIR does not acknowledge that the long-term viability of the California Tiger Salamander ("CTS"), a candidate species for federal listing under the Endangered Species Act. is severely threatened by the CP/GUP.

The DEIR's analysis of impacts on open space is equally defective, in that the document both omits relevant information and is frequently misleading. The DEIR even goes so far as to assert, incorrectly, that open space would receive a higher level of protection under the CP/GUP than it currently does because certain areas, such as the Arboretum and the Oval would be designated as "Campus Open Space" under the proposed project. While the Committee fully supports Stanford's decision to finally designate these areas as open space, the DEIR's assertions significantly understate the project's actual impact on important open space lands. In one glaring omission, for example, the DEIR fails to provide any analysis of the cumulative loss of open space. This and other deficiencies are especially disturbing inasmuch as the proposed CP presents a tremendous opportunity to preserve sensitive open space in Santa Clara County. As will be discussed below, other Bay Area communities have required land

dedications and/or fees for purchase of land as mitigation for the loss of important open space resulting from development projects. Inexplicably, the CP/GUP DEIR fails to suggest similar mechanisms for open space protection in the present case.

The DEIR also fails to adequately identify or analyze a reasonable range of project alternatives that could potentially reduce adverse impacts, as is required by CEQA. Indeed, the DEIR provides only one true alternative to the project – the reduced project alternative – and even this alternative does not provide any substantive environmental benefit over the proposed project. Neither does the DEIR include an adequate, fact-based analysis of the relative environmental impacts of the listed alternatives. Finally, and perhaps most troubling, the DEIR fails to include <u>any</u> alternative that precludes development within the California Tiger Salamander Management Zone.

Because the DEIR presents inadequate information to support an informed, responsible decision on the CP/GUP, the County must prepare a revised document that properly identifies and analyzes the project's impacts, mitigation measures and alternatives. Only then can the public and decision makers be adequately informed of the environmental repercussions of the project.

I. THE COMMUNITY PLAN, AS PROPOSED, FAILS TO COMPLY WITH THE STATE PLANNING AND ZONING LAW.

66-1 A. The Community Plan Is Legally Inadequate.

Under California law. a local government's general plan serves as the "constitution for future development" within that jurisdiction, with which all subordinate land use decisions (e.g., zoning ordinances, subdivision map approvals, and other approvals) must be consistent. See, e.g., DeVita v. County of Napa, 9 Cal.4th 763, 773 (1995); Gov't Code §§ 65454, 65860, 66473.5. The general plan consists of a statement of development policies, including text and diagrams setting forth objectives, principles, standards, and plan proposals. Each general plan must show proposed land uses for the jurisdiction's entire planning area and must contain seven elements, including (among others) a land use element, housing element, and circulation element. Gov't Code § 65302.

The Legislature has mandated certain requirements for each of the general plan elements. Specifically, the land use element must contain a statement of the standards of population density and building intensity for each district. Gov't Code

§ 65302(a); Twain Harte Homeowners Association v. County of Tuolomne, 138 Cal.App.3d 664, 698-99 (1982). The purpose underlying these requirements is that the general plan's text and diagrams "should be detailed enough so that the users of the plan, whether staff, elected and appointed officials, [or] the public, can reach the same general conclusion on the appropriate use of any parcel of land at a particular phase of a city's or county's physical development." State of California Governor's Office of Planning and Research, General Plan Guidelines at 15 (1998). In particular, the density ranges must be specific enough to provide guidelines for making necessary consistency determinations. Gov't Code § 65302(a).

The CP, as proposed, fails to comply with these mandatory requirements. The CP would seek to replace the two existing County General Plan land use designations for Stanford lands with seven land use designations, which describe the current and intended land uses in different areas within the CP boundary. While the CP generally describes allowable uses within these seven new land use designations, it fails to provide standards of population density and building intensity for many of the designations. In particular, the draft Plan contains no standards for intensities or densities for the "Academic Campus." "Open Space and Academic Reserve." "Special Conservation." and "Campus Open Space" designations. Nor does the CP identify intensity or density standards for the "open space and field research" land use designation contemplated as an alternative component to the CP. Instead of providing the required standards, the Draft Plan inappropriately defers to the GUP. The fact that this information is included in the GUP does not release the County from its obligation to include intensity and density standards in its CP. As a result of this omission, it is simply not possible for anyone outside of the Stanford administration to know in advance what the appropriate or likely density intensity standards are for any particular parcel in these key areas.

The Committee remains perplexed at this startling omission, especially since the County has been apprised repeatedly that its general plan (or CP) must provide standards of density and intensity for its entire jurisdiction, including Stanford lands. Under well-established case law, the necessary implication of this legal deficiency is that the County may not lawfully grant any discretionary land use entitlements for development of the affected lands, at least where a "nexus" exists between the proposed land use and the CP's inadequacy. Garat v. City of Riverside, 2 Cal.App.4th 259, 293 (1991); Neighborhood Action Group v. County of Calaveras, 156 Cal.App.3d 1176 (1984). In Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692 (1990), for instance, the court invalidated a building permit based on a general plan inadequacy analogous to the defect in the present case. Similarly, in Neighborhood Action, the court

held that the issuance of a conditional use permit was beyond the county's authority because the noise element of the county's general plan was legally deficient. 156 Cal.App.3d at 1186-89; see also City of Carmel-by-the-Sea v. Board of Supervisors, 137 Cal.App.3d 964 (1982) (holding a use permit void based on inadequacy of general plan). The CP must be revised to include building intensity and population density standards before the County can consider its approval, or the approval of the GUP.

66-2
2. The CP and GUP Are Inconsistent with the Santa Clara County
General Plan, and Approval of the CP Would Render the General Plan
Internally Inconsistent.

Approval of the CP/GUP is additionally problematic inasmuch as these entitlements stand in direct conflict with unambiguous provisions of the County General Plan. The General Plan sets forth numerous strategies, policies and implementation mechanisms devoted to managing growth within the County. In one such fundamental policy, the General Plan identifies compact development as a "cornerstone of wise growth management." General Plan at A-3. To successfully implement this growth management strategy, the General Plan states that the expansion of urban service areas should be controlled (at B-3), and that infill development should occur through the expansion of urbanized areas and not on hillsides or in resources areas (at B-5). Most importantly, the County General Plan prohibits urban types and levels of services whether from public or private service providers, outside cities' Urban Service Areas. General Plan, Policy R-GD 6 at K-4. In direct violation of these policies and in marked contrast to sound land use planning principles, the CP/GUP proposes to allow urban levels of development within the Lathrop District. Located in the Stanford foothills, the Lathrop District supports sensitive biological resources and lies outside of Palo Alto's Urban Service Area/Urban Growth Boundary.

The proposed CP/GUP would also conflict with numerous provisions in the General Plan reflecting the need to protect the biological integrity of critical habitat areas. The General Plan calls for the preservation of those habitat areas richest in biodiversity and necessary for preserving threatened or endangered species. See General Plan policy C-RC-31. As will be discussed more fully below, implementation of the CP/GUP would result in substantial loss of California Tiger Salamander habitat and could also significantly impact the red-legged frog, the western pond turtle and other sensitive species.

In sum, if approved, the proposed CP/GUP would fly in the face of long-standing County policies relating to growth management and the protection of biological resources. Such stark inconsistencies, like the CP's omission of necessary standards for land use density and intensity, render any County approval of the project vulnerable to legal challenge under the Planning and Zoning Law.

II. THE DEIR FAILS TO COMPLY WITH CEQA.

66-3 A. The DEIR's Project Description Is Incomplete and Therefore Inadequate.

The DEIR's analysis of potential environmental impacts suffers from the fundamental defect that it is based upon an incomplete and inconsistent description of the project itself. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus, 27 Cal.App.4th 713, 729 (1994), quoting County of Invo v. City of Los Angeles, 71 Cal.App.3d 185, 193 (1977). As a result, courts have found that even if an EIR is adequate in all other respects, the use of a "truncated project concept" violates CEQA and mandates the conclusion that the lead agency did not proceed in a manner required by law. San Joaquin Raptor, 27 Cal.App.4th at 729-30. Furthermore, "[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." Id. at 730 (citation omitted). Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable.

The DEIR's description of the proposed project here is flawed in several respects. First, the DEIR fails to clearly define the purpose of the proposed Academic Growth Boundary ("AGB"). Under the current proposal, Stanford has delineated an AGB that contains sufficient land to accommodate the University's projected growth for the next ten years. Yet, accommodating Stanford's growth should be only one of the factors in determining the appropriate location of a growth boundary. Urban growth boundaries are more commonly utilized to promote compact urban development patterns and to serve as a mechanism for preserving open space and other resources. Thus, general plan policies establishing growth boundaries typically: (1) determine the community's need for amenities such as open space and recreational areas, and (2) identify those areas not suitable for development because of their resource value, such as agricultural lands and wildlife habitat. Nevertheless, in this instance. Stanford appears to have "backed into" its proposed AGB by merely identifying a line that accommodates Stanford's development

plans. Accordingly, each of the DEIR's "alternative components" assumes, as a foregone conclusion that the project must accommodate two million square feet of academic development within the AGB. Perhaps even more troubling, there is no assurance that this "growth boundary" has any permanence, and therefore any real purpose, since Stanford would leave itself the option of periodically revising the boundary location. DEIR at 2-6. As will be discussed in the alternatives section of this letter, the County should establish an AGB beyond which no urban land uses can be permitted during the term of the Community Plan. Such periodic revisions to the AGB would be contrary to the General Plan which requires a reassessment of growth boundaries every ten years. See General Plan Policy C-GD-22.

- In a related omission, the DEIR fails to identify the total development and redevelopment potential on Stanford lands, and specifically on the core campus. Of course, it is important to ascertain Stanford's ultimate build-out potential in order to evaluate the appropriateness of the proposed AGB. Such an evaluation is especially necessary in light of statements by Stanford that "construction has reached the edges of the University's level spaces" (DEIR at 4.2-1), implying that encroachment into the foothills is necessary to support the University's educational functions. A revised environmental document should identify and discuss the development and redevelopment potential within each of the University's ten Development Districts, taking into account the environmental sensitivity of these lands.
- The DEIR also lacks sufficient detail about Stanford's anticipated academic facilities, including the location and extent of these uses. Stanford proposes two million square feet of academic and related uses over the next ten years, yet with a few exceptions (DEIR at 2-12), the DEIR provides no indication of where this development would occur or of its nature and intensity. Given the project's ten-year planning horizon, it is likely that Stanford is currently evaluating development proposals at least at the conceptual level. To the extent practicable, specific development information should be included in a revised environmental document.
- The DEIR further fails to adequately describe all of the development that could occur within Academic Reserve/Open Space ("AR/OS") lands. While the DEIR states generally that Stanford has proposed that "limited development" be allowed within the AR/OS area through individual Use Permits, the document provides no detail as to what that "limit" might be. (DEIR at 1-4.) Any additional development of AR/OS lands is of paramount concern to the Committee, as it could result in a significant loss of open space and adversely impact plant and wildlife resources. A revised environmental

document must identify and describe the extent of this potential development, so that its environmental impacts may be analyzed.

- Moreover, while the proposed project would delete "Special Condition Areas" from the County General Plan, this important change is not identified or discussed in the DEIR's project description. Currently, the foothills area is designated as "Special Condition Area" C, where development regulations require a separate County Use Permit for all non-residential buildings in excess of 5,000 square feet and all residential buildings other than caretaker housing units. DEIR at 4.2-3. A revised environmental document should include the deletion of these "Special Condition Areas" in the project description, and provide an analysis of the environmental impacts resulting from the loss of this protective general plan provision.
- Nor does the DEIR provide sufficient information relating to Special Conservation Areas. While the DEIR contemplates the potential expansion of these Conservation Areas (alternative component LU-E), it does not identify the specific location of these lands nor even the criteria that the County would use to determine which areas would be provided with this protective designation.
- In addition, the DEIR fails to include critical information relating to the GUP process. Under the proposed GUP, Stanford would generally be allowed to apply to the County's Architectural and Site Approval Committee for approval of new academic facilities, but projects of a specified size or scope may be required to receive Planning Commission approval. DEIR at 1-4. Yet, while the DEIR asserts that the latter projects will be identified through the conditions of the GUP (id.), neither the DEIR nor the GUP application identifies them.
- Finally, the DEIR does not include sufficient mapping to enable the reader to understand the components of the project or its environmental impacts. In particular, the DEIR lacks a map that depicts the existing boundaries of Palo Alto's Urban Service Area. Such omissions in the DEIR's project description render the document legally inadequate.
 - B. The DEIR Does Not Adequately Analyze Environmental Impacts
 Caused by the Project.

An EIR must effectuate a fundamental purpose of CEQA: to "inform the public and responsible officials of the environmental consequences of their decisions

before they are made." Laurel Heights Improvement Ass'n v. Regents of the University of California, 6 Cal.4th 1112, 1123 (1994) ("Laurel Heights II"). To do so, an EIR must contain facts and analysis, not just an agency's bare conclusions. Citizens of Goleta Valley v. Board of Supervisors, 52 Cal.3d 553, 568 (1990). An EIR must provide a sufficient degree of analysis to allow decisionmakers to make intelligent judgments. CEQA Guidelines § 15151; Kings County Farm Bureau, 221 Cal.App.3d 692. The EIR must both analyze the project's potentially significant environmental impacts and propose feasible mitigation measures and alternatives to reduce these impacts. Pub. Res. Code § 21002; CEQA Guidelines §§ 15126.2, 15126.4. As set forth below, the DEIR fails to comport with these requirements in several respects.

1. The DEIR Lacks the Specificity Necessary to Afford the Public and Decision Makers With a Meaningful Assessment of Project Impacts.

The DEIR for the Stanford project apparently is intended to serve as a master environmental assessment, which can be tiered with subsequent environmental review of specific projects. DEIR at 1-3. Such first-tier environmental documents are most useful in analyzing later projects, of course, if their analysis is both specific and comprehensive. Stanislaus National Heritage Project v. County of Stanislaus, 48 Cal.App.4th 182 (1996). The DEIR for the CP/GUP should focus, therefore, not only on the long-term and cumulative impacts of the present project, but also on specific impacts where particular development projects are already foreseeable. Unfortunately, however, the DEIR fails almost entirely in addressing the impacts of specific projects contemplated by the proposed GUP.

Although the GUP will allow specific levels of development at Stanford over the next ten years, the DEIR simply does not analyze the environmental impacts resulting from this development. The most notable example of this deficiency is the DEIR's nominal analysis of impacts upon biological resources. As will be described more fully below, the DEIR acknowledges that implementation of the GUP would affect a number of rare, threatened and endangered plant and animal species, but the document provides nothing more than a scant discussion of these impacts. This approach violates state law. The Court of Appeal invalidated such a cursory impact assessment in Stanislaus Natural Heritage Project v. County of Stanislaus, for example, explaining that CEQA requires environmental review to take place before project approval. 48 Cal.App.4th at 196 (citing Laurel Heights II for the proposition that a "fundamental purpose" of CEQA is to "inform the public and responsible officials of the

environmental consequences of their decisions before they are made"). The court specifically rejected the argument that a programmatic EIR for a specific plan and general plan amendment could ignore site-specific environmental review on the grounds that future phases of the development project would include environmental review, stating that "tiering' is not a device for deferring the identification of significant environmental impacts that the adoption of a specific plan can be expected to cause." <u>Id.</u> at 199. The court emphasized that agencies should expect environmental analysis to involve some degree of forecasting:

We do not by this opinion place any new burdens on preparers of EIRs. Our opinion today is merely an affirmation of already existing law. "Drafting an EIR... necessarily involves some degree of forecasting. While forecasting the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can."

Id. at 206, citing CEQA Guidelines § 15144.

Indeed, CEQA requires that project descriptions and environmental impact assessments account for reasonably foreseeable future phases, or other reasonably foreseeable consequences of proposed projects. In Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California, 47 Cal.3d 376, 396 (1988) ("Laurel Heights I"), for example, the California Supreme Court required that an EIR analyze the future effects of a project's expansion, or other action where "(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." In that case, the Court required the University's EIR to discuss the probable future expansion of its project in order to inform decision-makers and the public about the impacts that would likely occur. Id. In the instant case, more detailed environmental review is also clearly required, as specific development contemplated under the GUP is the precise purpose of the project now under consideration.

2. The DEIR's Cursory Assessment of Impacts Upon Biological Resources Is Legally Defective.

66-12

a. The DEIR Fails to Provide a Legally Adequate Discussion of the Biological Resources Setting.

CEQA provides that an EIR must include an adequate description of the environmental setting in the vicinity of the development areas identified and established by the project. See CEQA Guidelines § 15125(a). For the vast majority of plant and wildlife species on the Stanford campus, the DEIR simply fails to meet this requirement. The DEIR's descriptions of all plant species and all but one wildlife species that might be affected by the project are speculative, incomplete, and fail to reflect an effort at full disclosure of the species that will be at risk from the proposed development. Therefore, the DEIR is legally inadequate under CEQA. See CEQA Guidelines § 15151 (requiring an EIR to be detailed, complete, and reflect "a good faith effort at full disclosure").

While the DEIR provides fairly specific information on the habitat of the California Tiger Salamander in the project area, these data stand in stark contrast to the utter lack of specific information the DEIR provides in its description of *all* of the site's other biological resources. Compare DEIR, at 4.8-11 to -18 (describing CTS habitat and population, based upon extensive surveys of CTS on Stanford lands) with id. at 4.8-1 to 8-4 (discussing in general terms all potential plant communities in project area); 4.8-4 to 8-7 (discussing in general terms all wildlife habitat in project area); 4.8-8 to 4.8-11 (Tables 4.8-2 and 8.8-3) (tables listing all special-status plant and animal species that may occur in project area).

Indeed, the DEIR describes very little in the way of biological resources; rather, it speculates and hypothesizes as to what resources *may* exist in the project's vicinity. For example, in its discussion of rare, threatened, and endangered plants, the DEIR states that it is possible that undiscovered populations of numerous species, including Santa Clara red ribbons, western leatherwood, Ben Lomond buckwheat, fragrant fritillary, and robust monardella, could exist in developed and previously undeveloped areas that fall within the areas where the project will allow new development. DEIR at 4.8-27. Similarly, the DEIR merely speculates as to the presence of Gairdner's yampah, a California Native Plant Society ("CNPS") List 4 plant species. in the project area. DEIR at 4.8-35. The DEIR also voices suspicions that active nest sites

of raptors and migratory birds exist within the development area, but mentions no recent surveys performed on the site. DEIR at 4.8-35 to 36.

Furthermore, the document does not include the mapped locations of the actual or potential habitat for any of these species. Even the DEIR's comparatively fulsome review of the presence of CTS on Stanford lands does not clearly map the distribution of the species or identify all of the breeding and non-breeding habitat, including habitat contained in the foothills area. The DEIR seems to rely largely upon CTS surveys undertaken for prior, more contained projects; limited effort seems to have been made to provide a thorough survey of the CTS population existing within and outside the project area.

As the CEQA Guidelines declare, "[k]nowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project." CEQA Guidelines § 15125(c). An EIR that fails to identify important biological resources on or adjacent to the project's location is legally inadequate. See San Joaquin Raptor, 27 Cal.App.4th at 722-29 (voiding certification of EIR that provided inadequate description of project's location and environmental setting). Because the DEIR does little more than attempt to catalog the variety of species that *could* exist on the site, it fails to place *any* emphasis on the rare or unique species that *actually* inhabit Stanford's lands, and is therefore legally inadequate.

The DEIR's oft-repeated excuse to explain this legally inadequate setting is that Stanford has yet to decide upon the specific types and sites of development within the CP/GUP area. Instead, the DEIR promises that surveys of biological resources will take place after approval of the project but before any actual development takes place. Delaying field surveys and relying upon speculative assessments of the likely presence of a variety of species may well be a more convenient method of preparing an EIR than utilizing actual scientific data gathered from throughout the site, but it is impermissible as a matter of law under CEQA. As explained by the Court in Laurel Heights I, 47 Cal.3d at 399, "[w]e find no authority that exempts an agency from complying with the law, environmental or otherwise, merely because the agency's task may be difficult." See also Stanislaus Natural Heritage Project, 48 Cal.App.4th 182.

Moreover, delaying significant environmental review until specific projects are proposed, where such projects are a "reasonably foreseeable consequence of the initial

project" and are "likely to change . . . [the] environmental effects [of the initial project]," is itself a violation of CEQA. Laurel Heights I, 47 Cal.3d at 396. Furthermore, as explained below, the DEIR's deferral of a detailed and complete description of the environmental setting also renders legally inadequate its description of both the project's impacts and the effect of proposed mitigations on these impacts. See San Joaquin Raptor, 27 Cal.App.4th at 729 (legally inadequate description of environmental setting "precludes a determination that substantial evidence supports" EIR's proposed mitigations).

66 - 13

b. The DEIR's Analysis of the Project's Impacts Upon Biological Resources Is Inadequate.

As a result of the DEIR's failure to disclose existing biological resources in the project vicinity, its analysis of impacts upon these resources is incomplete and inadequate. CEQA requires that an EIR provide a sufficient degree of analysis to inform the public about the proposed project's adverse environmental impacts and to allow decision-makers to make intelligent judgments. CEQA Guidelines § 15151. Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado, 131 Cal.App.3d 350, 357 (1982) (finding an EIR for a general plan amendment inadequate where the document did not make clear the effect on the physical environment). Although the DEIR alludes to numerous significant environmental impacts to plant and wildlife species, its legally inadequate description of these biological resources renders its analysis of these significant impacts similarly inadequate.

The DEIR's analysis of the impacts to rare, threatened, and endangered plant species, for example, makes no assessment at all as to the significance of the project's environmental impacts. Instead, the "focused surveys" that the DEIR admits are the only proven method of studying potential environmental impacts will be deferred until project-level siting of new developments. DEIR, at 4.8-34; see also DEIR, at 4.8-36 (information on the impacts to raptor and migratory bird nests will not be collected until sites are chosen). Furthermore, the DEIR does not even consider either the potential loss of foraging habitat for raptors occurring in the area or the effect of additional rodent control measures implemented as part of the management of the developed areas of the project on the raptor population. Nor does the DEIR consider the effect of such increased rodent control on State fully protected species, such as the white-tailed kite and the golden eagle.

In short, although the DEIR suspects, and allows for, significant impacts, it does so only in the most abstract way and provides the public and decision-makers with no information as to the specific species that might be at risk. Merely allowing for significant impacts is insufficient under CEQA, which requires that an EIR provide more than "the bare conclusions of a public agency" in its analysis of significant environmental impacts. Santiago County Water District v. County of Orange, 118 Cal.App.3d 818, 831 (1981); see also Stanislaus National Heritage Project v. County of Stanislaus, 48 Cal.App.4th 182, 194-206 (1996) (invalidating EIR for residential project where agency concluded that effects on long-term water supply could result in significant impacts, but failed to provide any analysis of those impacts); Citizens of Goleta Valley v. Board of Supervisors, 52 Cal.3d 553, 568 ("Goleta II") ("EIR must contain facts and analysis, not just the agency's bare conclusions").

Similarly, the DEIR's findings of no significant impact on the steelhead trout and the California red-legged frog ("CRLF"), both of which are listed as threatened under the Federal Endangered Species Act, are conclusory and unsupported by substantial evidence. EIR, at 4.8-27. The fact that no development will be adjacent to creeks in the project area is not dispositive of whether these species will face significant impacts, as the DEIR itself implicitly admits by noting the potential for surface water runoff. Id. Meaningful analysis of the potential for surface water runoff effectuates one of CEQA's fundamental purposes: to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." Laurel Heights Improvement Ass'n v. Regents of the University of California, 6 Cal.4th 1112, 1123 (1993) (Laurel Heights II).

With respect to the CRLF, the DEIR provides no data on the distribution of the species within the vicinity of the project site, and therefore provides neither the public nor decision-makers with any information with which to judge the DEIR's assumptions. In fact, suitable habitat for CRLF is known to occur in San Francisquito Creek. Accordingly, the DEIR for the nearby Sand Hill Road Project assumed that the species was present on the site. See Stanford Sand Hill Road Corridor Projects Draft EIR Volume 3: Environmental Impacts and Mitigation Measures, and Alternatives, at 4.7-58 (June 18, 1996), attached as Exhibit A. CRLF distribution and numbers can vary widely from season to season based on weather or changes in habitat, and CRLFs have been documented to travel distances of up to two miles overland to reach breeding sites, or during post-breeding dispersal, without regard to topography and upland habitat. See "Biological Review of the Stanford University Community Plan and General Use

Permit," prepared by Joe DiDonato. attached as Exhibit B. And like the CTS, the CRLF is known to use upland habitat for foraging and rodent burrows, such as those present in the Lathrop and West Campus areas, as estivation sites during the non-breeding season. It is therefore possible that CRLFs may enter the project area from the San Francisquito Creek corridor.

Joe DiDonato of BioQuest Consulting has identified two further potential impacts that the DEIR fails to consider. In his report, Mr. DiDonato notes that the DEIR fails to mention the potential distribution of western pond turtles on the project site and the potential impacts to this species from the project. The western pond turtle, a species that is listed as Protected by the Department of Fish and Game, use aquatic and riparian habitat, which exists within the San Francisquito drainage, and frequently uses upland habitat for foraging, egg-laying or as estivation sites. The species has been inventoried in the San Francisquito Creek. Sand Hill DEIR, at 4.7-33. Development of the West Campus and Lathrop districts may impact this species by eliminating foraging and estivation sites. Mr. DiDonato also notes that development within the Lathrop District would reduce the size of the campus golf course. If, as seems most likely, the course is expanded into the foothills, the CTS and other special status species, including sensitive species, will be vulnerable to additional impacts that the DEIR does not consider or address.

For all of these reasons, we conclude that the DEIR fails sufficiently to inform the public and decision makers of the environmental consequences of the project. The DEIR must be revised.

66 -14 c. The DEIR Fails to Adequately Identify and Analyze
Measures to Mitigate Impacts Upon Biological Resources.

CEQA requires that mitigation measures be identified and analyzed. "The purpose of an environmental impact report is . . . to list ways in which the significant effects of such a project might be minimized" CEQA § 21061. The Supreme Court has described the mitigation and alternative sections of the EIR as the "core" of the document. Citizens of Goleta Valley, 52 Cal. 3d 553.

The DEIR's discussion of possible measures to mitigate biological impacts is tlawed in several respects. Most significantly, the DEIR's conclusions that some impacts are mitigated to below a level of significance are entirely lacking in evidentiary

support. For example, the DEIR relies on future, pre-construction and pre-demolition surveys to identify habitat, nesting locations of sensitive species, and rare, threatened and endangered plants. DEIR, at 4.8-35 to -36 (mitigation of loss of raptor and migratory bird nests); 4.8-37 to -38 (mitigation of permanent loss of sensitive native plant communities); 4.8-40 to -41 (mitigation of impacts on wetlands). Yet, such studies will come far too late and may not be relied upon to reduce wildlife and vegetation impacts below a level of significance. See Oro Fino Gold Mining Corp. v. County of El Dorado, 225 Cal.App.3d 872, 884-885 (1990) ("CEQA process demands that . . . environmental information be complete and relevant and that environmental decisions be made in an accountable arena."). Moreover, the DEIR renders such analysis ineffective because it would not ensure that impacts will be avoided prior to the approval of the proposed project. Sundstrom v. County of Mendocino, 202 Cal.App.3d 296, 309 (1988) (deferral of mitigation until after project approval is inadequate). There is no guarantee that the project can be modified if sensitive habitat and plant species are identified prior to construction but after project approval.

Moreover, with respect to the purported mitigation program for raptor and migratory bird nests, the DEIR fails to demonstrate that establishing "appropriate construction setbacks" will in fact mitigate the project's impact to less than significant. Id. at 4.8-36. Setbacks are temporary attempts to reduce impacts to existing nests during construction periods and are not intended to mitigate the permanent impacts from the development. Because the DEIR does not cite any raptor nest searches within the project area, even such inadequate efforts at mitigation are likely to fail. The DEIR simply fails to provide substantial evidence supporting its conclusion that the impacts to raptor nesting will be mitigated to a level below significance.

Furthermore, the DEIR relies on numerous thresholds of significance that it neither explains nor supports with substantial evidence, making it more difficult to evaluate whether the proposed mitigation programs will reduce impacts to a less than significant level. The DEIR merely asserts, without citation or explanation, that the threshold of significance for permanent loss of habitat for sensitive wildlife species, for CNPS list three or four plant species, and for special-status plant habitat, is a 10-percent loss. Id. at 4.8-23. In addition, the DEIR also asserts, without citation or explanation, that the replacement of habitat at a ratio of two acres of replacement habitat for each acre of special-status plant habitat and special-status plants lost will mitigate the project's significant impact so long as a minimum of 80 percent of the transplanted plants survive. Id. at 4.8-34 to -35. Because the DEIR fails to provide substantial support for the figures

upon which it relies to find significant impacts and their mitigation, the DEIR is legally inadequate.

The DEIR's proposed mitigation for the CTS is similarly flawed in that it presents a disturbing choice between one clearly insufficient mitigation option and a satisfactory option whose requirements the project proponent, based upon its recent actions, is likely to be unwilling to implement. Of the two options, the DEIR correctly notes that Option 1, which was proposed by Stanford, will not provide sufficient mitigation because it fails to provide long-term protection of CTS habitat. Option 1 will not guarantee that the new breeding ponds it requires will be effective before new development begins. DEIR at 4.8-32. A recent long-term study of the life history of CTS shows that 75-80 percent of CTS returned to the pond in which they were born, and the rest returned to other ponds within the region. Peter Cornell Trenham, Jr., Demography, Migration, and Metapopulation Structure of Pond Breeding Salamander (1998) (unpublished Ph.D. dissertation, University of California (Davis)). Because the CTS is relatively long-lived and individuals typically breed successfully only once in their lifetime, the development of new breeding ponds may have no long-term benefits to the population.

In addition, this same study tracked CTS in their dispersal from the ponds and found that the majority of the CTS were estivating in areas 500-700 meters out from the breeding ponds, with some animals traveling more than 1000 meters. <u>Id</u>. Therefore, construction of new breeding ponds may not mitigate the destruction of existing ponds, and the areas around any new or existing breeding pond must be protected to allow extensive CTS dispersal. Accordingly, development should not advance *until* successful breeding has been shown in the new ponds for an adequate period of at least three years, and mitigation measures must include adequate permanent conservation measures to allow individual CTS to disperse from and return to the pond in which they were born. Option 1, which would not allow for necessary mitigation, is simply not a viable means to mitigate the extensive impacts caused by this project.

We agree with the DEIR that Option 2 would reduce impacts upon the CTS, and is far superior to Option 1. This measure requires, among other things, that where land containing CTS habitat is to be developed. Stanford shall provide for the long-term protection and management of an amount of land equal to three times the acreage of that which would be developed, and that Stanford shall establish three new breeding ponds in the foothills area south of Juniper Serra Boulevard prior to commencement of

construction on occupied CTS habitat that is within 500 meters of Lake Lagunita. Nevertheless, Stanford has indicated its unwillingness to permanently dedicate land for the CTS. See San Francisco Chronicle article, May 31, 2000, attached as Exhibit C. The amount of land proposed to be dedicated as mitigation for the proposed Carnegie project was a mere three acres, yet Stanford thus far has refused to commit to this land dedication. Furthermore, given the vast and frightening number of deaths of CTS documented in the DEIR -- from construction-related activities, automobiles, storm drains and utility boxes, and drift fences and gates meant to hold CTS left open or in disrepair (DEIR, at 4.8-12 to -13) -- there is little reason to be confident either in Stanford's ability or willingness to mitigate impacts from its development.

Unless and until Stanford commits to the dedication of sufficient lands to protect the CTS on the Stanford campus, the DEIR cannot properly conclude that impacts upon this sensitive species, which is likely to be listed as a federal endangered species within the next 18 months, would be mitigated to an insignificant level. Nor is the mitigation program for the impact on CTS habitat the only program likely to be affected by Stanford's pattern of recalcitrance. The DEIR also identifies other mitigation mechanisms that rely on similar restoration programs for which there is no indication project proponents will actually perform. These include restoration programs for oak woodland and riparian oak woodland and for replacement trees. See DEIR at 4.8-38 to -39.

We also make the following comments regarding the proposed mitigations to impacts on CTS, based upon the attached report from our consulting biologist:

- Pre-construction surveys should be extended throughout the rainy season and not limited to the beginning of the season only.
- Construction vehicle speed should be limited to 10 mph and enforced with a permanent traffic control officer (Page 4.8 31, (b)(2)). Voluntary restrictions based only on posted speed limits have not successfully reduced road-killed San Francisco garter snakes at the SF airport construction site.
- Habitat management within the CTS conservation site should include the development of a range and vegetation management plan addressing vegetation height, ground squirrel colony maintenance, public access and infrastructure.

Additional research on the movements of CTS should be developed and include marked and telemetered animals to identify routes of travel from breeding ponds and levels of site fidelity. This information should be used as a measure of the success of the new breeding ponds.

In sum, having failed to provide sufficiently specific descriptions of the environmental setting of, and impacts upon, the biological resources of the project area, the DEIR fails to meet CEQA's requirements for identifying and analyzing mitigation measures.

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d. The DEIR's Analysis of Cumulative Impacts Upon Biological Resources Is Inadequate.

CEQA requires lead agencies to consider cumulative impacts, or the incremental effects of the proposed project viewed together with the effects of past, current, and probable future projects. Pub. Res. Code § 21083(b); Guidelines § 15130(a)-(b). An EIR will be invalidated if it fails to provide sufficient information concerning the cumulative impacts of the project under review. See, e.g., Los Angeles Unified Sch. Dist. v. City of Los Angeles, 58 Cal.App.4th 1019, 1025-28 (1997) (EIR inadequate for failure to consider all reasonably foreseeable consequences of project); San Joaquin Raptor, 27 Cal.App.4th at 738-39 (EIR inadequate for failure to list and consider effects of project along with other development projects under consideration in vicinity); Kings County, 221 Cal.App.3d at 718 (EIR inadequate for failure to consider and provide reasonable analysis of relevant cumulative impacts of similar projects in vicinity).

The courts have repeatedly emphasized the importance of the cumulative impacts analysis. See, e.g., Bozung v. Local Agency Formation Commission, 13 Cal.3d 263, 283 (1975). A legally adequate "cumulative impacts analysis" views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b). This mandate assumes even greater importance where, as here, the DEIR addresses a far-reaching Community Plan and GUP that will regulate and implement development of the Stanford campus for the coming decade. See Guidelines § 15168(b)(4) (programmatic EIR allows agency to "consider broad policy alternatives and program-wide mitigation measures" at an early stage when the agency has greater flexibility to deal with cumulative impacts).

When an agency finds that a project may have a significant cumulative impact on a particular environmental resource, the CEQA Guidelines require the EIR's discussion of cumulative impacts to include the following three elements: (1) either (a) a list or summary of the projects producing related or cumulative impacts, or (b) a summary of such projections contained in an adopted general plan or related planning document which evaluates regional or areawide conditions; (2) a summary of the expected environmental impacts from those projects; and (3) a reasonable analysis of the cumulative impacts of the relevant projects together with the proposed project, documented with references to scientific and empirical evidence. Guidelines § 15130(b)(1)-(3); Kings County, 221 Cal.App.3d at 729.

The DEIR here fails to comply with CEQA's requirements since the County's purported assessment of cumulative impacts to biological and water resources consists predominantly of restating project-specific impacts. Indeed, because the County neglected in the first instance to provide adequate data on related development projects in the region, a proper cumulative impacts analysis was not even possible here. For example, despite the fact that Stanford is just beginning construction on the 225,000 square foot Clark Center near Campus West Drive, the CP/GUP DEIR fails to include this significant project in its cumulative impacts analysis.

Moreover, the DEIR fails to provide the required consideration of the cumulative impact on biological resources of the CP/GUP together with other projects currently being considered on Stanford lands, as well as projects under consideration in the County. With respect to the California Tiger Salamander, for example, the DEIR notes that the Carnegie Foundation Research Office Facility project ("Carnegie Project") is located within the existing CTS Management Zone at Stanford. The document, however, fails to mention or discuss the fact that the Carnegie Project DEIR found potentially significant impacts to both CTS population and habitat from operation and construction of the facility. See Carnegie Project DEIR, at 3.3-8. Similarly, as explained above, the DEIR for the Sand Hill Road project identified both the western pond turtle and the CRLF as species whose habitats would be impacted by the project, and assumed that they may be present on the project site (see Exhibit A at 4.7-58); the CP/GUP DEIR fails not only to consider whether these species would be present on the project site, but also fails to consider the cumulative impact of this project.

The DEIR thus clearly neglects to analyze the cumulative impacts that these and other projects within the County will have on the long-term viability of CTS and other rare and threatened species. Moreover, the DEIR fails to consider thoroughly

whether the incremental loss of any members of plant and wildlife species or their habitat caused by this project will contribute to the larger cumulative impact by the Carnegie and Sand Hill Road projects, as well as other relevant projects undertaken throughout the County. For these reasons, we conclude that the DEIR fails to provide a reasonable description and analysis of the cumulative impacts of all relevant projects together with the CP/GUP project.

3. The DEIR's Discussion of Impacts Upon Open Space Is Inadequate.

66 - 16

a. The Preservation of Open Space on the Stanford Campus Is of Vital Importance.

The proposed CP/GUP would convert hundreds of acres of open space to intensive urban development, and greatly increase the demand for open space lands. At the same time, permanent protection of important open space areas has become an urgent need in the Bay Area and indeed throughout the state. California statutory and case law have long recognized open space as a valuable environmental resource. Accordingly, the California Legislature has declared that "open-space land is a limited and valuable resource which must be conserved wherever possible." Gov't Code § 65562(a). Nearly thirty years ago the California Supreme Court recognized that "[t]he elimination of open space in California is a melancholy aspect of the unprecedented population increase which has characterized our state" Associated Home Builders of the Greater East Bay, Inc. v. City of Walnut Creek, 4 Cal.3d 633, 638 (1971), cert. denied, 404 U.S. 878 (1971).

Growing evidence suggests that open space conservation is not an expense, but a worthwhile investment that produces enormous economic benefits. Open space is a major attraction for employees, residents and visitors because it increases the attractiveness of an area as a place to live, work, and recreate. As the Trust for Public Land explains:

The DEIR never discloses the exact amount of open space that would be converted to urban uses under the proposed CP/GUP, a problem that calls into serious question the adequacy of the DEIR's project description. See supra § II.A.

Too often we hear that communities cannot afford to "grow smart" by conserving open space. But accumulating evidence indicates that open space conservation is not an expense but an investment that produces important economic benefits. Some of this evidence comes from academic studies and economic analysis. Other evidence is from firsthand experience of community leaders and government officials who have found that open space protection does not "cost" but "pays."

The Economic Benefits of Parks and Open Space: How Land Conservation Helps Communities Grow Smart and Protect the Bottom Line (1999), attached as Exhibit D, at 3. For example, a 1990 study in New England found that clustered housing designed to preserve open space appreciated faster than comparable homes on comparable lots. Id. at 7. Open space used recreationally as trails and wildlife tourism can also have significant economic benefits. See id. at 26-27. Local businesses benefit greatly from open space that attracts visitors from other areas. See id. at 27.

Similarly in the present case, the County and the Midpeninsula Open Space District have long recognized that significant open space resources are gravely threatened by the rapid pace of sprawling development in the County. As a result, these agencies undertook studies to evaluate those open space lands in the County most worthy of preservation and protection. See excerpts from the Santa Clara County "Open Space Preservation: A Program for Santa Clara County 2020 Task Force" (April 1987) (hereinafter "2020 Plan"), attached as Exhibit E. These studies determined that Stanford foothill lands' proximity to existing public open space lands, together with their inherent scenic value, make them a "high priority" for acquisition and protection. Indeed, these lands -- referred to as the Los Trancos/Felt Lake -- are ranked tenth out of approximately 60 study areas for open space acquisition. See 2020 Plan. The 2020 Plan specifically provides that the preservation and acquisition of these lands would provide an effective urban buffer, as well as important watershed and "viewshed" protection. Id.

New development planned for Stanford lands would particularly benefit from the permanent conservation of surrounding hillsides. Protection of these lands would also have widespread benefits for residents and visitors of the area, as they provide spectacular views and a multitude of recreational opportunities. Given their location near the Matadero Creek and San Francisquito Creek Trail Corridors, some of these lands could be dedicated as part of the Bay Area Ridge Trail Project, which seeks to establish a

continuous trail system encircling the San Francisco Bay and linking the main ridges that rise up from the Bay. See The San Francisco Bay Area Conservancy Program, Regional Needs Briefing Book (Apr. 5, 1999), at 16-17, attached as Exhibit F.

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b. The DEIR's Analysis of Open Space Impacts Is Legally Deficient.

Given the dwindling supply of open space lands in the region and the importance of Stanford's open space lands in particular, the DEIR should have prepared a detailed and complete analysis of the present project's open space impacts. Yet, the DEIR's purported analysis of this subject is grossly inadequate. Although the document correctly concludes that open space impacts would be "significant" as a result of the implementation of the CP/GUP, the DEIR fails to include an accurate and comprehensive analysis of those impacts. The deficiencies in the DEIR's analysis are set forth below.

The draft CP/GUP proposes the redesignation of several areas on Stanford lands, comprising several hundred acres, from the "AR/OS" designation to "Academic Campus." Notably, some of the land proposed for redesignation is also currently designated under the existing GUP as "Special Condition Areas," a designation that limits development by, among other things, requiring a separate County Use Permit for any building in the area. Of critical importance, the project contemplates even redesignating a portion of "Special Condition Area C" in the Stanford foothills -- the Lathrop District -to "Academic Campus." Discussing this fundamental change in designation, however, the DEIR arrives at the remarkable conclusion that the removal of sites from "Special Condition Area" status will have no direct open space impact because development was already allowed in those areas with a Separate Use Permit. DEIR at 4.2-18. This argument is fundamentally flawed. Stanford cannot seriously contend that removing the significant hurdle of a requirement of a use permit -- a separate discretionary approval from the County -- does not promote development of these valuable lands. Following Stanford's convoluted reasoning, no development project would ever cause an environmental impact because development is always "allowed" by a general plan.

In keeping with its faulty assumption, the DEIR declines to provide any analysis of impacts relating to the redesignation of the Lathrop District to "Academic Campus." While the DEIR asserts that the GUP contemplates only 20.000 feet of development in that location, the document later acknowledges that redesignation of the Lathrop District would create the potential for future development in the area. DEIR at

4.2-20. The DEIR's failure to provide any analysis of the loss of this important open space renders it legally inadequate.

The DEIR also understates the magnitude of the project's impact on open space by claiming that certain other areas on the central campus (e.g., the Arboretum. Palm Drive, the Oval, a portion of the Stable area and Lake Lagunita) would be designated as "Campus Open Space," thereby offsetting the removal of important open space lands from the "AR/OS" designation. DEIR at 4.2-18. In an astounding leap of logic, the DEIR even contends that open space will receive a higher level of protection under the CP/GUP than it currently does. Id. Again, the EIR misses the point. While the designation of these areas in the central campus as "Campus Open Space" is appropriate. it in no way compensates for the loss of open space lands in the foothills that would result from implementation of the CP/GUP. The value of the foothills as open space and as habitat for biological resources is unquestionably superior to that of these more urbanized areas. Moreover, because the areas surrounding Lake Lagunita provide important habitat for the California Tiger Salamander (and are located in the CTS Management Zone), it is unlikely the County would ever allow extensive development in that location. Finally, because the "Campus Open Space" designation allows limited academic use, open space protection is not even assured under that designation.

The DEIR is also legally deficient in that it fails to provide <u>any</u> analysis of impacts resulting from development in the Arboretum and golf course. The CP/GUP provides an unspecified level of development in these areas and, as a result, the DEIR must analyze the effects of this loss of open space.

The DEIR's discussion of the loss of open space in terms of its impact on recreational opportunities, is equally deficient. The CP/GUP proposes to develop a number of sites that presently provide important recreational amenities, including the Lathrop District in the foothills, the Stable site, the golf course, and a number of open spaces within the faculty housing area. DEIR at 4.2-21. In addition, recreational opportunities in the foothills may soon be further restricted as Stanford proposes to engage in habitat and environmental restoration in the Dish. DEIR at 4.2-22. Although the DEIR identifies the loss of recreational opportunities as a significant impact, the document substantially understates the extent to which the public relies on Stanford open space for this purpose. A revised environmental document should include a thorough analysis of current recreation uses (e.g., birdwatching, hiking, golfing, horseback riding, ball games, etc.) and a detailed assessment of the project's impact on those activities.

Partially as a result of the DEIR's deficient analysis of recreational impacts, the document fails to identify mitigation capable of reducing this impact. For example, while the DEIR states generally that Stanford "shall improve parks in the faculty area," it does not discuss what these improvements might be, or how they would meet the recreational needs of the population. Nor does the DEIR provide any evidence that identified impacts would, in fact, be mitigated to an insignificant level. Of critical importance, while the DEIR proposes generally to improve parks and dedicate trail easements on the County Master Plan, the document reveals that the project proponent has not agreed to dedicate or improve trail routes. DEIR at 3-5 and 4.2-22. Under these circumstances, the DEIR cannot properly conclude that recreational impacts have been mitigated to an insignificant level.

Finally, the DEIR fails to adequately analyze the cumulative loss of open space, as required by CEQA. CEQA Guidelines § 15130. Because of the fundamental importance of Stanford's open space lands and the encroachment onto these lands by other development in the County, the DEIR should have carefully analyzed the cumulative impacts of this loss of open space. Although the DEIR identifies myriad projects in the County, Palo Alto and Menlo Park (DEIR at 6-2 through 6-5), the discussion stops short of actually analyzing the effect of these projects combined with the present proposal, on open space loss in the County. Instead, the DEIR merely repeats its discussion of project-specific impacts.

In sum, the DEIR's discussion of open space and recreation impacts is incomplete, misleading and unsupported by necessary analysis. In light of the flaws identified above, the environmental document must be substantially revised before the County can properly consider approving the CP/GUP.

c. The DEIR Fails to Identify Feasible Mitigation Measures to Reduce the Project's Significant Impact on Open Space.

One of the fundamental objectives of CEQA is to facilitate the identification of "feasible alternatives or feasible mitigation measures which will avoid or substantially lessen" significant environmental effects. Pub. Res. Code § 21002. To effectuate this purpose, CEQA cautions that "public agencies should not approve projects as proposed if there are . . . feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects" Id. Consequently, an EIR must identify feasible mitigation measures to mitigate significant environmental impacts. CEQA Guidelines § 15126.4. As the Supreme Court has held.

"The core of an EIR is the mitigation and alternatives sections." <u>Citizens of Goleta Valley</u>, 52 Cal.3d at 564.

Despite the DEIR's conclusion that the CP/GUP would result in the loss of important open space, the document proposes mitigation in only one location -- the Lathrop District. DEIR at 4.2-20. Yet even as to this area, the DEIR provides no evidence that the proposed mitigation measure--the clustering of development--would effectively mitigate impacts resulting from allowing urban development there. Indeed, the DEIR admits that the Lathrop District, which would be subject to a heightened range and intensity of permissible development, would no longer have any open space protection. DEIR at 4.2-21. While the DEIR suggests that the adoption of an alternate Academic Growth Boundary and land use designation could mitigate impacts to an insignificant level (id.), the document fails to provide any evidence to support this theory. In fact, "AGB- A" would still allow for development of at least 20,000 square feet in the Lathrop District.²

Equally troubling, the DEIR proposes <u>no</u> mitigation for the loss of open space resulting from the redesignation of all of the other Stanford lands proposed to be converted to urban uses. Of critical importance, the DEIR fails to identify mitigation for the loss of open space at the Stable site and the Arboretum. At the same time, the DEIR concludes, inexplicably, that impacts upon open space will be mitigated to an "insignificant" level. DEIR at 4.2-21. Plainly, this conclusion is unsupportable.

The DEIR's failure to propose adequate mitigation is even more flagrant in the document's discussion of cumulative loss of open space. The DEIR merely restates the one mitigation measure proposed for impacts relating to the CP/GUP (i.e., the clustering of development within the Lathrop District), effectively leaving the entire subject unaddressed.

The DEIR's failure to consider mitigation for the loss of open space lands, both on a project-specific and cumulative level, is particularly egregious given the wide variety and number of successful programs that exist to address this issue. Mitigation is defined by the CEQA Guidelines to include:

². It appears that the CP/GUP contemplates at least two development projects in the Lathrop District -- a 20,000 square foot development and the proposed Carnegie Foundation. See DEIR at 7-41, discussion of AGB-A.

- (a) Avoiding the impact altogether by not taking a certain action or parts of an action.
- (b) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- (c) Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- (d) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- (e) Compensating for the impact by replacing or providing substitute resources or environments.

CEQA Guidelines § 15370.

Here, the proposed project's impact on open space lands can be mitigated through the implementation of programs that protect similar lands in other locations. There are numerous examples of communities that have required either land dedications and/or fees for purchase of open space as mitigation for significant open space impacts. Examples include, but are not limited to, the following:

- Shea Business Park (Cavetano Corporate Campus), North Livermore Area. In order to mitigate for the loss of open space caused by its corporate campus, the Business Park paid a mitigation fee of \$600,000 to implement an open space/habitat management program in North Livermore. See Attachment G (excerpt from Cayetano Corporate Campus FEIR (Oct. 12, 1998) at 3-2, 3-4, and 3-5); Attachment H (excerpt from Development Agreement for Cayetano Corporate Campus).
 - (2) North Livermore Specific Plan. The DEIR for the proposed North Livermore Specific Plan proposes that new residential development in the North Livermore Valley pay an open space fee of \$25,000 per acre (net of parks, arterial roadways, creek corridors and schools) to a proposed North Livermore Conservancy. The land proposed for development is neither high habitat value nor prime agricultural land.

 See Attachment I (excerpt from North Livermore Specific Plan).

Accordingly, the environmental document for the CP/GUP should include and analyze the following sorts of mitigation measures capable of reducing impacts resulting from the project:

- Clustering of development to protect open space lands in exchange for permanent protection of those lands through an appropriate instrument (e.g., dedication of lands to a land trust and/or multiple party holders of easements or other acceptable means of ensuring permanence.)
- Payment of a mitigation fee to an appropriate conservation organization for purchase of mitigation lands.
- Purchase in fee title or conservation easement of comparable open space land in the area and permanent protection of that land through a dedication to an appropriate open space conservation entity.

At present, the DEIR's failure to identify and analyze mitigation for the loss of open space leaves the document woefully deficient under CEQA. The County should rectify this inadequacy and take the unique opportunity presented by the proposed project to invest in the protection of open space lands through effective mitigation programs.

4. The DEIR Fails to Provide Adequate Analysis of Impacts on Visual Resources.

66 -20

As discussed above, implementation of the CP/GUP would result in urban levels of development on open space areas located in the Stanford's core campus and in the foothills. Of critical concern are proposed development plans in the Stanford foothills, as this area is highly visible from numerous recreational and public use areas throughout the County. Despite heightened community attention to this issue, the DEIR remarkably does not provide any analysis of the project's visual impacts upon public use areas -- other than El Camino Park and Matadero Creek Trail. The document omits this analysis even though it acknowledges that there are "a number of regional recreational areas" which have views of Stanford lands. DEIR at 4.2-23. Neither does the DEIR discuss, let alone analyze, the visual impacts resulting from the proposed development of the Stable Site or the golf course driving range.

The DEIR does analyze the project's visual impacts to County roads and highways (I-280 and Junipero Serra Boulevard ("JSB"), as indeed it should, since these are considered to be scenic routes. The DEIR implies that development would significantly impact views from JSB, but inexplicably concludes that requiring design review would reduce the impact to a level of insignificance. DEIR at 4.2-16. In fact, the CP/GUP contemplates substantial development adjacent to JSB, including 38 acres of housing on the Stable Site, academic development in the Lathrop District, two "pockets" of residential development at Gerona/Junipero Serra and Lower Frenchman's, and development on the Stanford Golf Course. Design review may help to reduce the visual intrusion of this extensive development, but the fact remains that this development will forever mar the view of existing open space from scenic roadways.

Accordingly, the DEIR erred in its conclusion that impacts upon scenic roads would be "insignificant." As found by the court in Quail Botanical Gardens Foundation, Inc. v. City of Encinitas, 29 Cal.App.4th 1597, 1606 (1994), it is "self-evident" that replacing open space with a subdivision will have an adverse effect upon "views and the beauty of the setting." Here, the CP/GUP proposes far more than a subdivision. Indeed, the entire stretch of JSB between Campus Drive West and Campus Drive East would be developed at urban levels, thus substantially altering the existing open, natural character of the Stanford foothills.

66-21 C. The DEIR Fails to Adequately Discuss Alternatives to the Proposed Project.

An EIR must (1) describe a range of reasonable alternatives to the proposed project, and to its location, that would substantially attain the project's basic objectives with reduced environmental impact, and (2) evaluate the comparative merits of each alternative. Pub. Res. Code §§ 21002, 21100(a)(6); CEQA Guidelines § 15126(d). The agency's identification and analysis of alternatives should foster informed decision-making and informed public participation. CEQA Guidelines § 15126(d)(5).

The requirement to set forth and analyze the impacts resulting from each of the EIR's alternatives is crucial to CEQA's mandate that significant environmental harm be substantially lessened or avoided where feasible. Pub. Res. Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); Citizens for Quality Growth v. City of Mount Shasta, 198 Cal.App.3d 433, 443-45 (1988). Without meaningful analysis of alternatives in the EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process . . . [Courts will not] countenance a result that would require blind trust

by the public, especially in light of CEQA's fundamental goal that the public be fully informed as to the environmental consequences of action by their public officials." Laurel Heights I, 47 Cal.3d at 404.

The DEIR's alternatives analysis is defective in that it provides only one legitimate alternative to the project -- the reduced project alternative -- and even this alternative does not provide any substantive environmental benefit over the project. The reduced project alternative cuts in half the amount of academic and residential development on Stanford lands, and also reduces the number of parking spaces by roughly one-half. DEIR at 7-4 through 7-10. Despite the reduced development levels, however, this alternative results in land use, open space, biological and visual resources impacts that are virtually identical to those of the proposed project. Thus, for example, the DEIR reveals that the reduced project alternative would likely propose for development, albeit at a reduced level, many of the same sites so identified by the CP/GUP. Therefore, as with the proposed CP/GUP, the loss of open space and visual impacts would remain significant. DEIR at 7-14. At the same time, the reduced project alternative does not eliminate the project's significant impacts upon the CTS and rare, threatened and endangered plants. DEIR at 7-27 and 7-28.

In addition, the DEIR fails to provide the requisite <u>comparative</u> analysis of the project, reduced project and no-project alternatives. Thus, the DEIR's table purporting to compare these alternatives provides no detailed analysis -- and certainly no quantification -- addressing the environmental impacts likely to result from each option. There are no specifics, for example, concerning the extent to which the reduced project alternative might lessen impacts to the CTS and other biological species. Instead, the DEIR merely observes that "the reduced amount of development makes avoidance of CTS habitat more feasible." DEIR at 7-27 and 7-28. Under CEQA, such self-evident ruminations cannot substitute for meaningful analysis. <u>City of Antioch v. City Council</u>, 187 Cal.App.3d 1325 (1986). Rather, "[a]n EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making. [Citation.]." <u>Laurel Heights I</u>, 47 Cal.3d at 404.

Tellingly, many of the alternate components simply do not reduce or eliminate the project's numerous significant impacts. While AGB-A could reduce some of the open space and visual impacts resulting from development south of Junipero Serra Boulevard, this option would still redesignate all of the Lathrop District to "Academic Campus," thereby allowing the development of at least 20,000 square feet in that location. Moreover, contrary to the DEIR's conclusion, clustering this 20,000-square foot

development near other buildings would <u>not</u> reduce the project's significant impacts upon open space and visual resources. AGB-B, on the other hand, would relocate this 20,000-square foot development to an area north of JSB. While the Committee strongly supports such a relocation, the DEIR does not identify which land use designation would apply to the Lathrop District under this scenario. If AGB-B is to be truly effective in eliminating open space, biological and visual resource impacts in the Lathrop District, this option must assign the Lathrop District an "AR/OS" or "Open Space and Field Research" designation. Moreover, AGB-B has the serious disadvantage of being inconsistent with Palo Alto's Urban Service Area/Urban Growth Boundary.

Options LU-A and LU-B are also problematic. While LU-A would redesignate the remaining undeveloped portions of "Academic Campus" to "Open Space and Field Research," this alternative would still allow for the development of 20,000 square feet in the Lathrop District. LU-B, while providing protection for the CTS population near Lake Lagunita, would actually significantly impact other biological resources (possibly including the CTS at another location), as well as open space and visual resources, by relocating the golf course to an area south of JSB and constructing housing on the golf course.

The Committee is especially concerned that the DEIR includes no alternative that would preserve CTS habitat immediately west of Lake Lagunita, in the CTS Management Zone. The CP/GUP proposes the development of 350 dwelling units in this location (See Site F at DEIR 2-11 and 2-13). This area is actively managed as CTS habitat pursuant to the CTS Management Agreement and provides temporary habitat for juvenile CTS, as well as year-round habitat for juveniles and adults. Important CTS habitat has already been destroyed due to the development of residential and academic facilities to the north, east and southeast of Lake Lagunita, while the heavily-traveled JSB borders the Lake on the south. Preservation of the golf driving range site for CTS habitat is, therefore, the last opportunity to preserve a significant portion of CTS habitat. A revised environmental document must include an alternative that preserves this area.

In addition to an option preserving the above-referenced CTS habitat, the DEIR should analyze an alternative, or alternative components, that incorporate the following provisions:

Establish an AGB, consistent with the Palo Alto urban services boundary, beyond which no urban land uses can be permitted during the term of the Community Plan. The County should provide that during this term Stanford

may not amend the AGB. While exceptions to this prohibition on amendment may be considered to accommodate legitimate planning or environmental concerns, such exceptions should remain limited in scope. Moreover, the County should include strong policies in the CP which state that there shall be no amendment of the AGB until such time as Stanford's core campus is fully built out.

- o An alternative that contemplates the approval of the CP, but defers approval of the GUP until a later date, when the specific nature of Stanford's planned development projects may be better ascertained.
- An alternative in which the County places restrictions on the amount of development that Stanford would be allowed on an annual basis. Instead of granting a blanket approval to Stanford for 2 million square feet of academic facilities, and 3000 parking spaces, the DEIR should include an alternative that phases those development levels over the ten-year period.
- Alternative approaches to land use development that would preserve sensitive habitat and existing open space areas and facilitate development within PaloAlto's urban services boundary. Examples of alternative development approaches include (1) redevelopment within the core campus which would demolish underutilized buildings and replace those buildings with higher density development (e.g., reduced building footprints and increased building heights) and (2) the use of parking structures instead of surface parking lots.

An adequate EIR must include a range of alternatives that could feasibly obtain most of the project objectives and analyze the comparative merits and environmental impacts of the alternatives in meaningful detail and in a quantitative comparative fashion. Only then would the DEIR foster informed decision making and demonstrate that the County has complied with CEQA.

66-22 IV. CONCLUSION

For the foregoing reasons, the Committee For Green Foothills urges the County to (1) revise the Community Plan to include proper building intensity and population density standards. (2) redesign the CP'GUP in a manner consistent with the

Santa Clara County General Plan, and (3) prepare a revised environmental document that fully complies with CEQA and the CEQA Guidelines.

Very truly yours,

SHUTE, MIHALY & WEINBERGER, LLP

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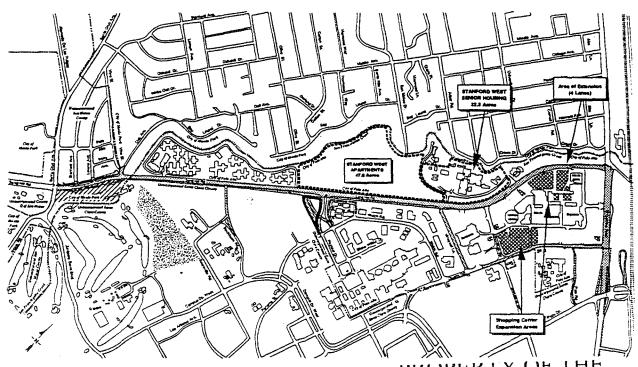
Denice Dade, Committee for Green Foothills

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Draft Environmental Impact Report

Stanford Sand Hill Road Corridor Projects

Volume 3: Environmental Impacts And Mitigation Measures, And Alternatives



PREPARED FOR

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CITY OF PALO ALTO
STANFORD EIR
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PREPARED BY

EIP Associates Sacramento, California



June 18, 1996

4.7 BIOLOGICAL RESOURCES

INTRODUCTION

This section of the EIR includes an assessment of biological resources on the project sites and the potential for adverse effects to sensitive habitats and species from development of the projects. The most critical biological issues evaluated in this section are potential direct and indirect impacts to the San Francisquito Creek riparian corridor.

It should be noted that the environmental effects of the Pasteur Drive Parcel and other annexation projects, are evaluated in Section 5.1, Pasteur Drive Parcel and Other Annexations.

Baseline Information

Background materials and information were gathered from several sources. To determine whether sensitive animal or plant species occur in the study area, EIP consulted California Natural Diversity Data Base (CNDDB) 1995 records¹ and reviewed communication between the California Department of Fish and Game (CDFG) and the City of Palo Alto.² Information on sensitive plants was obtained from the California Native Plant Society's *Inventory of Rare and Endangered Vascular Plants of California*.³ Information on the status of sensitive plant and wildlife species was obtained from the U.S. Fish and Wildlife Service (USFWS).⁴⁵

EIP obtained San Francisquito Creek Stream Inventory data from the Coyote Creek Riparian Station.⁶ Information contained in the Stream Inventory detailing vegetation types, habitat communities, fisheries habitat, channel types, and tree inventory, bird observation, and reptile and amphibian survey databases was reviewed and incorporated into this report. Data and a map from

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California Department of Fish and Game, Natural Heritage Division, California Natural Diversity Database Rare find Report, 1995.

Hunter, Brian, Regional Manager, Region 3, State of California Department of Fish and Game, January 25, 1993. Letter to Lori Topley, City of Palo Alto.

Skinner, M.W. and Bruce M. Paylik, 1994. California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California.

⁴ U.S. Fish and Wildlife Service Region 1, News Release, dated May 20, 1996.

U.S. Fish and Wildlife Service. Federal Register, 50 CFR, Part 17, Wednesday, February 28, 1996.

⁶ Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

the San Francisquito Creek: Biotic Evaluation conducted by H.T. Harvey & Associates in March 1994, were reviewed.⁷ The arborist's survey reports of September 1991, May 1992, December 1993, August 1994, March 1995, and April 1996 were reviewed.⁸

EIP biologists conducted assessments of habitat during general field surveys on October 27 and November 2, 1993, and September 9, 1994. During field surveys, special emphasis was placed on identifying the presence of any State- or federally-listed threatened or endangered plant or animal species, candidates proposed for such listing or plants or animals considered to be state or federal species of concern. A field survey conducted on June 6, 1995, focused on the riparian corridor 200 feet above and below, and to either side of, the existing Sand Hill Road bridge over San Francisquito Creek. Particular attention was directed upon significant biological resources such as mature oaks and other riparian trees, and the Creek channel. The June season for the biological field survey is appropriate because it is near the peak of the growing season for riparian habitats, and both resident and migratory bird species would be present. A list of all plant and wildlife species observed during EIP's field surveys or which have been reliably reported to occur is presented in Table 4.7-1.

To document conditions at other seasons, the San Francisquito Creek Inventory data for reaches within and adjacent to the project areas were obtained from the Coyote Creek Riparian Station. Quantitative vegetation, bird, and fisheries surveys were conducted and data collected at established uniformly spaced sampling sites during eight surveys occurring between September 1, 1993 and July 7, 1994.

REGULATORY BACKGROUND

Federal Regulations

A myriad of federal and state statutes provide a regulatory structure which guides the protection of biological resources. The following discussion provides a summary of those laws that are relevant to biological resources in the vicinity of the projects site.

Clean Water Act - Section 404

Section 404 of the Clean Water Act (1972) prohibits filling jurisdictional "waters of the United States" without a permit issued by the Army Corps of Engineers under a Memorandum of Understanding with the Environmental Protection Agency. "Waters of the United States" are defined by list and include oceans, bays, lakes, ponds, rivers, their tributaries, adjacent wetlands, and isolated wetlands used for interstate commerce, including those subject to use by migratory

⁷ Harvey, H.T. & Associates., 1994. San Francisquito Creek: Biotic Evaluation.

Morneau, Ray. Arborist's Report concerning update to existing tree survey—Stanford West, Old Stanford Children's Hospital Site, September 4, 1991; Report concerning update to existing tree survey—Stanford West, Phase II, May 26, 1992; Pre-Construction Tree Survey for Sand Hill Road Improvement and Stanford Shopping Center Construction Projects, December 31, 1993; Pre-Construction Tree Survey for Alternative Housing Site, August 15, 1994; Pre-Construction Tree Survey for Arboretum Road/Quarry Road Site, March 9, 1995; Pre-Construction Supplemental Tree Inventory — Sand Hill Road Extension, April 8, 1996.

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name Scientific Name Habitat Type						
PLANTS Native or Naturalized Trees, Shrubs, and Vines						
Blackwood acacia* Acacia melanoxylon Urban/Eucalyptus, Landsea						
Acacia*	Acacia sp.	Urban/Eucalyptus, Landscape				
Big-leaf maple	Acer macrophyllum	Riparian				
Box elder	Acer negundo	Riparian				
California buckeye	Aesculus californica	Grassland				
Tree of heaven*	Ailanthus altissima	Urban/Eucalyptus, Landscape, Riparian				
White alder	Alnus rhombifolia	Riparian				
Madrone	Arbutus menziesii	Grassland				
Coyote brush	Baccharis pilularis	Grassland				
Cotoneaster*	Cotoneaster sp.	Urban/Eucalyptus, Landscape				
Oregon ash	Fraxinus latifolia	Riparian				
English ivy*	Hedera helix	Urban/Eucalyptus, Landscape				
Toyon	Heteromeles arbutifolia	Grassland				
Northern California black walnut	Juglans californica var. hindsii	Riparian, Grassland				
Fremont cottonwood	Populus fremontii	Riparian				
Black cottonwood	Populus trichocarpa	Riparian				
Holly-leaved cherry	Prunus ilicifolia	Grassland				
Coast live oak	Quercus agrifolia	Grassland				
Valley oak	Quercus lobata	Grassland, Riparian				
Himalaya berry*	Rubus discolor	Urban/Eucalyptus, Riparian				
California blackberry	Rubus ursinus	Riparian				
Aποyo willow	Salix lasiolepis	Riparian				
Blue elderberry	Sambucus mexicana	Riparian, Grassland				
Snowberry	Symphoricarpos rivularis	Grassland				
Poison oak	Toxicodendron diversilobum	Riparian, Grassland				
California bay laurel	Umbellularia californica	Riparian				
Periwinkle* ·	Vinca sp.	Riparian				

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type	
Grape	Vitus sp.	Riparian	
TOTAL 28			
La	ndscape Trees and Shrubs	nere en	
White fir	Abies concolor	Landscape	
Japanese maple	Acer palmatum	Landscape	
Red horsechestnut	Aesculus carnea	Landscape	
European white birch	Betula alba	Landscape	
River birch	Betula nigrn	Landscape	
Incense Cedar	Calocedrus decurrens	Landscape	
Camellia	Camellia japonica	Landscape	
Pecan	Carya illinoenensis	Landscape	
Deodar cedar	Cedrus deodara	Landscape	
Oriental hackberry	Celtis sinensis	Landscape	
Chinese plum-view	Cephacotaxus fortunei	Landscape	
Carob	Ceratonia siliqun	Landscape	
Eastern (American) redbud	Cercis canadensis	Landscape	
Camphor tree	Cinnamomum camphora	Landscape	
English hawthorne	Crataegus oxycantha	Landscape	
Cypress	Cupressus sp.	Landscape	
Wild persimmon	Diospyros sp.	Landscape	
Red gum	Eucalyptus camaldulensis	Landscape	
Blue gum	Eucalyptus globulus	Landscape	
Flooded box	Eucalyptus microtheca	Landscape	
Red ironbakk	Eucalyptus sideroxylon	Landscape	
(Flowering) Raywood ash	Fraxinus ornus	Landscape	
Shamel ash	Fraxinus undei	Landscape	
Green ash	Fraxinum pennsylvanica	Landscape	
Evergreen ash	Fraxinus uhdei	Landscape	
Maidenhair tree	Ginkgo biloba	Landscape	
Black walnut	Juglans nigra	Landscape	

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type
Sick oak	Grevill	Landscape
English walnut	Juglans regia	Landscape
Hollywood juniper	Juniperus chinensis 'Torulosa'	Landscape
Goldenrain tree	Koelreuteria paniculata	Landscape
Glossy privet	Ligustrum lucidum	Landscape
Chinese sweet gum	Liquidambar formosana	Landscape
Sweet gum .	Liquidambar styraciflua	Landscape
Tulip tree	Liriodendron tulipifera	Landscape
Osage orange	Maclura pomifera	Landscape
Southern magnolia	Magnolia grandiflora	Landscape
Apple	Malus pumila	Landscape
Crabapple	Malus sp.	Landscape
Chinaberry	Melia azedarach	Landscape
Fruitless mulberry	Morus alba	Landscape
Olive	Olea europaea	Landscape
Ironwood	Olneya tesota	Landscape
Canary date palm	Phoenix canariensis	Landscape
Colorado spruce	Picea pungens	Landscape
Colorado blue spruce	Picea pungens 'glauca'	Landscape
Aleppo pine	Pinus halepensis	Landscape
Canary island pine	Pinus canariensis	Landscape
Monterey pine	Pinus radiata	Landscape
Chinese pistache	Pistacia chilensis	Landscape
Victorian box	Pittosporum undulatum	Landscape
London plane	Platanus acerifolia	Landscape
Yew pine	Podocarpus macrophyllus	Landscape
Almond	Prunus amygdalus	Landscape

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type
Purple-leaf plum	Prunus blireiana	Landscape
Cherry plum	Prunus cerasifera	Landscape
Hollyleaf cherry	Prunus ilicifolia	Landscape
Sargent cherry	Prunus sargentii	Landscape
Japanese flowering cherry	Prunus serrulata	Landscape
Douglas fir	Pseudotsuga menziesii	Landscape
Italian buckthorn	Rhamnus sp.	Landscape
Bradford pear	Pyrus sp.	Landscape
McDonald oak	Quercus macdonaldii	Landscape
Holly oak	Quercus ilex	Landscape
Cork oak	Quercus suber	Landscape
Black locust	Robinia pseudoacacia	Landscape
California pepper	Schinus molle	Landscape
Brazilian pepper	Schinus teperinthifolius	Landscape
Coast redwood	Sequoia sempervirens	Landscape
Giant sequoia	Sequoiadendron giganteum	Landscape
Bottle tree	Sterculia sp.	Landscape
Cedar	Thuja sp.	Landscape
Littleleaf linden	Tilia cordata	Landscape
American elm	Ulmus americana	Landscape
Chinese elm	Ulmus parvifolia	Landscape
Siberian elm	Ulmus pomilo	Landscape
Washington fan palm	Washingtonia filifera	Landscape
Spanish dagger	Yucca mohavensis	Landscape
Queen palm	Arecastrum romanzoffianum	Landscape
TOTAL 79		
	Herbaceous Plants	
Amaranth	Amaranthus sp.	Riparian
Summer mustard	Brassica geniculata	Grassland, Riparian
Italian thistle	Carduus pycnocephalus	Grassland

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY' SANTA CLARA COUNTY, CALIFORNIA

Yellow star thistle	Centaurea solstitialis	Grassland		
Jerusalem oak	Chenopodium botrys	Riparian, Grassland		
Bull thistle	Cirsium vulgare	Riparian, Grassland		
Bindweed	Convolvulus arvensis	Riparian, Grassland, Urban/ Eucalyptus, Landscape		
Horseweed	Conyza sp.	Grassland, Riparian		
Poison hemlock	Conium maculatum	Riparian		
Willow herb	Epilobium brachycarpum	Riparian		
Cut-leaved geranium	Geranium dissectum	Grassland		
Dove-leaved geranium	Geranium molle	Grassland		
Cudweed	Gnaphalium sp.	Grassland, Riparian		
Telegraph weed	Heteromeles grandiflora	Grassland		
Wild lettuce	Lactuca serriola	Grassland, Riparian		
Cheeseweed	Malva sp.	Grassland		
Wild cucumber	Marah fabaceus	Riparian		
Horehound	Marrubium vulgare	Urban/Eucalyptus, Riparian, Grassland		
Pennyroyal	Mentha pulegium	Riparian		
Narrow-leaved plantain	Plantago lanceolata	Grassland, Riparian		
Wiregrass, knotweed	Polygonum aviculare	Grassland, Riparian, Urban/ Eucalyptus, Landscape		
Wild radish	Raphanus sativus	Grassland, Riparian		
Curly dock	Rumex crispus	Grassland, Riparian		
Groundsel	Senecio vulgaris	Grassland, Riparian, Urban/ Eucalyptus, Landscape		
Milk thistle	Silybum marianum	Riparian, Grassland		
Sow thistle	Sonchus oleraceus	Riparian, Grassland		
Dandelion	Taraxacum officinale	Riparian, Grassland, Urban/ Eucalyptus, Landscape		
TOTAL 27				
	Creekbed Plants	_		
Sedge	Carex sp.	Riparian		
Brass buttons	Cotula coronopifolia	Riparian		
Tall flatsedge	Cyperus eragrostis	Riparian		
Saltgrass	Distichlis spicata	Riparian		

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY' SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type		
Rush	Juncus sp.	Riparian		
Yellow waterweed	Jussiaea repens	Riparian		
Creeping wildrye	Leymus triticoides	Riparian		
Mint	Mentha sp.	Riparian		
Knotweed	Polygonum sp.	Riparian		
Watercress	Rorippa nasturtium- aquaticum	Riparian		
Cat-tail	Typha sp.	Riparian		
Spiny clotbur	Xanthium spinosum	Riparian		
Cocklebur	Xanthium strumarium vas. canadense	Riparian		
TOTAL 13				
	Grasses :			
Slender oatgrass	Avena barbata	Grassland		
Ripgut brome	Bromus diandrus	Grassland		
Soft chess	Bromus mollis	Grassland		
Bermuda grass	Cynodon dactylon	Grassland, Riparian		
Blue wildrye	Elymus glaucus	Grassland, Riparian		
Farmer's foxtail	Hordeum murinum vas. leporinum	Grassland, Riparian		
Italian ryegrass	Lolium multiflorum	Grassland, Riparian		
Ditch grass	Paspalum sp.	Grassland, Riparian		
Annual bluegrass	Poa annua	Grassland, Riparian		
Rabbitfoot grass	Polypogon monspeliensis	Grassland, Riparian		
Fescue	<i>Vulpia</i> sp.	Grassland		
TOTAL 11				

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type	Season
	ANIMALS ²		
Аш	ohibians and Reptiles		
California slender salamander	Batrachoseps attenuatus	Riparian	Resident
Frog sp.	Rana sp.	Riparian	Resident
Northwestern pond turtle	Clemmys marmorata marmorata	Riparian	Resident
Western fence lizard	Sceloporus occidentalis	Grassland	Resident
Northern alligator lizard	Elgaria coerlea	Grassland	Resident
TOTAL 5			
	Birds		
Great blue heron	Ardea herodias	Riparian	Resident
Green heron	Butorides virescens	Riparian	Resident
Wood duck	Aix sponsa	Riparian	Resident
Mallard	Anas platyrhynchos	Riparian	Resident
Turkey vulture	Cathartes aura	Grassland	Resident
Northern harrier	Circus cyaneus	Grassland	Resident
Sharp-shinned hawk	Accipiter striatus	Riparian	Resident
Cooper's hawk	Accipiter cooperi	Riparian	Resident
Red-shouldered hawk	Buteo lineatus	Riparian	Resident
Red-tailed hawk	Buteo jamaicensis	Grassland	Resident
American kestrel	Falco sparverius	Riparian	Resident
California quail	Callipepla californica	Grassland	Resident
Rock dove	Columba livia	Urban/ Eucalyptus	Resident
Band-tailed pigeon	Columba fasciata	Riparian	Resident
Mourning dove	Zenaidura macroura	Urban/ Riparian, Grassland	Resident
Common barn owl	Tyto alba	Riparian, Urban/ Eucalyptus	Resident

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY' SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type	Season		
ANIMALS ²					
Great horned owl	Bubo virginianus	Riparian	Resident		
Anna's hummingbird	Calypte anna	Riparian	Resident		
Belted kingfisher	Ceryle alcyon	Riparian	Resident		
Acom woodpecker	Melanerpes formicivorus	Riparian	Resident		
Red-breasted sapsucker	Sphyrapicus ruber	Riparian	Winter Migrant only		
Nuttall's woodpecker	Picoides nuttalli	Riparian	Resident		
Hairy woodpecker	Picoides villosus	Riparian	Resident		
Northern flicker	Colaptes auratus	Riparian, Urban/ Eucalyptus	Resident		
Olive-sided flycatcher	Contopus borealis	Riparian	Resident		
Black phoebe	Sayornis nigricans	Riparian	Resident		
Steller's jay	Cyanocitta stelleri	Urban/ Eucalyptus, Riparian	Resident		
Scrub jay	Aphelocoma coerulescens	Urban/ Eucalyptus, Riparian	Resident		
Chestnut-backed chickadee	Parus rufescens	Riparian	Resident		
Plain titmouse	Parus inornatus	Riparian	Resident		
Common bushtit	Psaltriparus minimus	Riparian	Resident		
White-breasted nuthatch	Sitta carolinensis	Riparian	Resident		
Bewick's wren	Thryomanes bewickii	Riparian	Resident		
Ruby-crowned kinglet	Regulus calendula	Riparian	Resident		
Western bluebird	Sialia mexicana	Riparian	Resident		
Hermit thrush	Catharus guttata	Riparian	Resident		
American robin	Turdus migratorius	Urban/ Eucalyptus, Riparian	Resident		

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type	Season
	ANIMALS ²	<u> </u>	•
Northern mockingbird	Mimus polyglottos	Urban/ Eucalyptus, Riparian	Resident
California thrasher	Toxostoma redivivum	Riparian	Resident
Cedar waxwing	Bombycilla cedrorum	Riparian	Resident
European starling	Sturnus vulgaris	Urban/ Eucalyptus	Resident
Hutton's vireo	Vireo huttoni	Riparian	Resident
Warbling vireo	Vireo gilvus	Riparian	Summer Migrant only (breeding & nesting)
Orange crowned warbler	Vermivora celata	Riparian	Summer Migrant only (breeding & nesting)
Yellow warbler	Dendroica petechia	Riparian	Summer Migrant only (breeding & nesting)
Yellow-rumped warbler	Dendroica coronata	Riparian	Resident
Wilson's warbler	Wilsonia pusilla	Riparian	Summer Migrant only (breeding & nesting)
Spotted towhee	Pipilo erythrophthalmus	Riparian	Resident
California towhee	Pipilo crissalis	Riparian	Resident
Song sparrow	Melospiza melodia	Grassland, Riparian	Resident
Golden-crowned sparrow	Zonotrichia atricapilla	Grassland, Riparian	Winter Migrant Only (non breeding or nesting)

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type	Season
	ANIMALS ²		
White-crowned sparrow	Zonotrichia leucophrys	Grassland, Riparian	Winter Migrant Only (non breeding or nesting)
Dark-eyed junco	Junco hyemalis	Grassland, Riparian	Resident
Brewer's blackbird	Euphagus cyanocephalus	Grassland, Urban/ Eucalyptus	Resident
Brown-headed cowbird	Molothrus ater	Grassland	Resident
House finch	Carpodacus mexicanus	Grassland, Urban/ Eucalyptus	Resident
Lesser goldfinch	Spinus psaltria	Grassland	Resident
American goldfinch	Spinus tristis	Grassland	Resident
House sparrow	Passer domesticus	Grassland Urban/ Eucalyptus	Resident
TOTAL 59			
	Mammals		
Opossum	Didelphis virginiana	Riparian	Resident
Feral house cat	Felis domesticus	Urban/ Eucalyptus, Landscape	Resident
Striped skunk	Mephitis mephitis	Riparian, Urban/ Eucalyptus	Resident
Dusky-footed woodrat	Neotoma fuscipes	Riparian	Resident
Black-tailed deer	Odocoileus hemionus	Riparian	Resident
Norway rat	Rattus norvegicus	Riparian	Resident
Eastern gray squirrel	Sciurus carolinensis	Urban/ Eucalyptus, Riparian	Resident
Western gray squirrel	Sciurus griseus	Riparian	Resident

PLANT AND WILDLIFE SPECIES OBSERVED SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹ SANTA CLARA COUNTY, CALIFORNIA

Common Name	Scientific Name	Habitat Type	Season
	ANIMALS ²		
Fox squirrel	Sciurus niger	Landscape	Resident
California ground squirrel	Spermophilus beecheyi	Grassland	Resident
Brush rabbit	Sylvilagus bachmani	Riparian	Resident
Botta's pocket gopher	Thomomys bottae	Urban/ Eucalyptus, Landscape	Resident
Gray fox	Urocyon cinereoargenteus	Riparian	Resident
Red fox	Vulpes vulpes	Urban/ Eucalyptus, Landscape, Riparian	Resident
TOTAL 14			

¹ The Sand Hill Corridor Projects Area and Vicinity includes the adjacent reaches of San Francisquito Creek

SOURCES: Coyote Creek Riparian Station, 1995.

Wildlife species observed during field surveys on November 2, 1993 and June 6, 1995 or reliably reported to occur in the project vicinity. All listed plant species recorded during arborist's survey in November, 1992, and EIP field surveys October 27, and November 1993, September 9, 1994 and June 6, 1995. Wildlife and plant-species recorded for Points #22 and #23, between 9/1/93 and 7/7/94 by the San Francisquito Creek Stream Inventory also included.



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Biological Review of the Stanford University Community Plan and General Use Permit, CP/GUP, June 23, 2000

The following is an independent review of the Stanford University Community Plan and General Use Permit CP/GUP Draft Environmental Review to assess the adequacy of the documents as they relate to the biological resources, conservation and mitigation strategies, and State and Federal regulations governing the protection of the species identified within the document. This review was completed by Joseph E. DiDonato, Wildlife Biologist, BioQuest: Wildlife Consulting and Photography, 2624 Eagle Avenue, Alameda, CA 94501, (510)769-9209.

1. Adequacy of the Biological Resources Survey and Mapping

Appendix D of the CP/GUP identifies those species which have the potential to occur within the project area, and identifies particular plant and animal species which are known to occur within the project area. The Draft EIR does not, however, include mapped locations of the actual or potential habitat for these species. As a result of this inadequacy, it is not possible to accurately judge the distribution of plant and animal species, the interaction of these species with the proposed development plans, and the potential and realized impacts of the project on these species, their habitat, and their long-term survival. Additionally, the document's lack of adequate surveys and mapping prevents proper analysis of the mitigation proposals.

A. California Tiger Salamander (CTS)

This species received the most detailed review within the plan, perhaps due to the existence of known populations on the project site and to the large amount of research which has been conducted on the CTS on Stanford lands. Even with this research data, the Draft EIR does not clearly map the distribution of the species or identify all of the breeding and non-breeding habitat, including that contained in the Foothills area (which is within the proposed CTS Management Expansion Zone). The Draft EIR indicates that limited effort has been made to survey the populations existing within and outside the project area. In addition, it appears that multiple assumptions made in the document are based on the work of Stanford staff from the Center for Conservation Biology. It is therefore not possible to determine how implementation of CP/GUP would impact the CTS.

B. California Red-legged Frog (CRLF)

The Draft EIR assumes there is no distribution of the CRLF within the project area and therefore that the frogs will not be impacted by the project. The document includes no data on the distribution of the frog within the vicinity of the project site from which to judge the validity of these assumptions. One can only conclude that insufficient survey work has been done to document the absence of CRLF, or that surveys performed for this project were not performed according to USFWS or CDFG protocol and can therefore not be used to determine the presence of CRLF within the project area.

In fact, populations of CRLF do occur within San Francisquito creek and were identified in previous public documents (Stanford Sand Hill Road Corridor Projects, Vol. 3: Environmental Impacts and Mitigation Measures, 1996) In addition, frog distribution and numbers can vary widely from season to season based on weather or changes in habitat.

C. Raptor Nesting

Raptor nest searches were not conducted within the project area. Nest searches are necessary in order to map the location of nesting habitat and known nests in order to develop plans to minimize the impact of the project on nesting raptors. The Draft EIR mentions that pre-construction surveys will be conducted and that "setbacks" will be identified for any nests located. Such setbacks are merely temporary efforts to reduce impacts to existing nests during construction periods, and would not mitigate the permanent impacts from the development.

2. Habitat needs and Impact Assessment of Sensitive Plants and Wildlife

The DEIR relies on thresholds of significance that it does not explain. The threshold of significance relied upon by the Draft EIR for permanent loss of habitat for sensitive wildlife species, for CNPS list 3 or 4 plant species, and for special-status plant habitat, is a 10 percent loss. The Draft EIR also states that the replacement of habitat at a ratio of two acres of replacement habitat for each acre of special-status plant habitat and special-status plants lost will mitigate the project's significant impact if a minimum of 80% of the transplanted plants survive. Because the document does not explain where these thresholds come from, it is difficult to evaluate whether the proposed mitigation programs will reduce impacts to a less than significant level.

A. Wildlife: Amphibians

The U.S. Fish and Wildlife Service has documented that CRLF travel distances of up to two miles overland, without regard to topography, to reach breeding sites and during post-breeding dispersal (USFWS, 2000). It is therefore possible that CRLF may enter the project area from the San Francisquito creek corridor where they have been documented(Stanford Sand Hill Road Corridor Projects, Vol. 3: Environmental Impacts and Mitigation Measures, 1996). Similar to CTS, CRLF are known to use upland habitat for foraging and rodent burrows as estivation sites during the non-breeding season and may be present in the Lathrop and West Campus areas.

The Draft EIR does not assess potential impacts to the frogs from the proposed developments and

expansion of the campus or the implementation of mitigation, including the new breeding ponds. While these ponds may present new breeding sites for CRLF, access corridors to the sites(from San Francisquito creek) will be eliminated.

The Draft EIR does not identify the distribution of western pond turtles which occur on site (Weiss, S., Pers. Comm., 2000) and the potential impacts to this species. Western pond turtles, which are listed as a Federal and State Species of Concern, use aquatic and riparian habitat, and frequently use upland habitat for foraging, egg-laying or as estivation sites. There is habitat to support pond turtles within the San Francisquito drainage. Development of the West Campus and Lathrop districts may impact this species by eliminating foraging and estivation sites.

B. Wildlife: Raptors

The Draft EIR does not analyze the loss of foraging habitat for the raptors occurring in the area. It also fails to mention rodent control in newly developed areas which will have potential impact on raptors that forage in the area. These impacts require discussion of potential mitigation strategies to avoid "take" of State fully protected species, such as the white-tailed kite and the golden eagle, which may take place within the footprint of the project as a result of these impacts.

C. Sensitive Plants

No site-specific surveys of any special status plants were conducted for this document. The distribution of these plants is therefore not identified within the Draft EIR. Based on this lack of data, the Draft EIR does not adequately identify the location, population size, or potential impact to these species. Adequate surveys need to be performed to formulate impact analysis prior to the approval of the project.

Development within the Lathrop District will reduce the size of the campus golf course. Course expansion, most likely into the Foothills area may further impact the CTS habitat and population, as well as several other special status species including sensitive plants. The document does not adequately address this issue.

3: Habitat needs and Impact Assessment for the California Tiger Salamander

No site-specific surveys have been done as part of Draft EIR, which instead relies on data from Stanford's staff and the results of the annual monitoring within the CTS Management Plan to make assessments of the impacts to this species.

Even with the CTS Management Plan in place, mitigation measures have not been implemented and numerous CTS deaths have been recorded in 1996, 1997 and 1998. Construction-related deaths, road killed animals, and animals trapped in utility boxes are evidence that mitigation measures within the Management Plan have not been implemented sufficiently to reduce impacts to CTS. The

document identifies further problems with the mitigation measure: drift fences in disrepair, gates left open, and animal movements into development zones not prohibited by mitigation measures. High numbers of road-killed animals have been found in the Gerona Triangle and on Junipero Serra Boulevard. Failure of constructed breeding ponds and an inconsistent breeding success in one pond do not qualify as a successful mitigation strategy.

Mitigation measures proposed by Stanford (BIO-1(a) through (e) - Option 1) are inadequate and represent the same mitigation that has failed to reduce impacts in the past three years. Option 2 (not proposed by Stanford) should be mandated over Option 1 because it restricts development from advancing <u>until</u> successful breeding has been shown for an adequate period of 3 years and it develops a permanent conservation easement over the lands. Recent data from a long-term study at the Hasting's Preserve in San Luis Obispo County (*Trenham*, 1998) provides data on the life history of CTS and demonstrates why Stanford's proposed option will not mitigate the project's impacts.

Based on marked animals, the Trenham study found that approximately 75-80% of CTS returned to the pond in which they were born, and the remainder dispersed to other ponds within the region. The average age of a breeding CTS was between four and six years old and typically adults only bred once in their lifetime. Radio telemetered CTS were tracked in their dispersal from the ponds and the majority of the CTS were aestivating in areas 500-700 meters out from the breeding ponds, with some animals traveling more than 1000 meters. CTS are long-lived and breed successfully only a few times (at best) within their lifetime.

The development of three new breeding ponds may have no long-term benefits to the population and may in fact act as a sink if the ponds cannot be maintained. Additional impacts are anticipated and are outlined in the EIR and represent valid projections of future impacts. Option 1, which does not require an adequate showing of the success of the new breeding ponds, is therefore unacceptable.

It is highly likely that the CTS will be listed as a federal threatened species within the next 18 months. Option 2 identifies mitigation measures which would be consistent with management of a federal endangered species under a Habitat Conservation Plan, and sets this protection in motion in advance of this listing. It would be in Stanford's best interest (and that of the species) to develop guidelines and protective measures with little need for major revisions in the future.

Additional modifications to the mitigation for impacts on the CTS should include:

- 1. Pre-construction surveys should be extended throughout the rainy season and not limited to the beginning of the season only (Draft EIR, p. 4.8-31, (b)(1)).
- 2. Construction vehicle speed should be limited to 10 mph and enforced with a permanent traffic control officer (Page 4.8 31, (b)(2)). Voluntary restrictions based only on posted speed limits have not successfully reduced road-killed San Francisco garter snakes at the SF airport construction site (S. Larsen, USFWS, Pers. Comm., 2000).

- 3. Habitat management within the CTS conservation site should include the development of a range and vegetation management plan addressing vegetation height, ground squirrel colony maintenance, public access and infrastructure.
- 4. Additional research on the movements of CTS should be developed and include marked and telemetered animals to identify routes of travel from breeding ponds and levels of site fidelity. This information should be used as a measure of the success of the new breeding ponds.

References:

EIP Associates. 1996. Stanford Sand Hill Road Corridor Projects, Vol. 3: Environmental Impacts and Mitigation Measures, 1996. Draft EIR. Section 4.7, Biological Resources. Sacramento, CA. 64 pp.

Trenham, P.C. 1998. Demography, migration, and metapopulation structure of pond breeding salamanders. Unpubl. diss., Univ. of California, Davis.

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BAY AREA

Salamander In Way of Stanford Think Tank

Amphibians breed in Lake Lagunita's mud

By Bill Workman
CHRONICLE STAFF WRITER

The tiny California tiger salamander that several years ago ended Stanford University's traditional Big Game bonfire now threatens to slow construction of a major new think tank on university land.

As soon as winter rains begin pouring into Lake Lagunita's dry bed, the tiger salamanders come down out of the low foothills to breed in the mud across Junipero Serra Boulevard from where the think tank would go.

A draft environmental impact report on a proposal by the Carnegie Foundation for the Advancement of Teaching to build a 20,000-square-foot research center in the campus foothills calls for measures to prevent destruction of salamanders inhabiting the 4.5-acre site.

Carnegie wants to build a cluster of rustic buildings that would house 40 researchers and staff, replacing its rented quarters in old barracks at SRI International in Menlo Park. The foundation has signed a 51-year lease with Stanford for \$1 for the site.

The draft EIR, prepared by Santa Clara County planners, insists that Stanford, the foundation's landlord, must do a "preconstruction survey" to determine the size of the salamander population, and take steps to relocate them to a safe new habitat elsewhere in the foothills.

The survey, according to the EIR, must be taken during the rainy season — which can be anywhere from November to January or even later — and could mean further delay.



CARLOS AVILA GONZALEZ / The C

Nancy Manning of Los Altos worked with (far left) Mark Schrieber and (in group, from left) Doug MacEwen, Adar Warmoth and Matt Manning as they look for marine life in Stanford's Lake Lagunita.

ing out the salamander habitat issue won't delay its opening, projected for next spring.

"At this point, it's just a bump," Gay Clyburn, foundation spokes-woman, said yesterday. "We feel very comfortable with the EIR and that everything that is of concern in it can be mitigated."

However, complicating matters for the think tank project is that it has come before the county at a time when Staniord's controversial application for a new general use permit dealing with campus development over the next decade is also under consideration by the county—and under fire from its critics.

Environmentalists, who have been pressing Stanford to set aside the foothills as permanent open space, view the Carnegie Foundation project as a further encroachment into the hills, even though the site is close to two other independent research facilities — the Center for Advanced Study in Behavioral Sciences and the National Bureau of Economic Research — that have been there for years.

Denice Dade, executive director of the watchdog Committee for

cides to take a more in-depth look at the issue.

Although Stanford has said it has no plans for more foothill development for at least 10 years, she said, it has made "no commitment to back up its intentions."

Meanwhile, Stanford and Camegie appeared at odds over another requirement of the draft EIR — that a permanent conservation easement of 4.5 acres be granted by Stanford elsewhere in the foothills for a new salamander habitat away from the development.

Clyburn noted the foundation "can't possibly promise that we will provide the salamander with a permanent residence. We don't own the land."

Larry Horton, Stanford's director of community and government relations, said the university "is not prepared to make any permanent commitment" on the conservation easement question since Stanford is still negotiating details for a federal "habitat conservation plan" for several species, including the tiger salamander, that would embrace several hundred acres near the so-called Dish area and its increasingly popular trails.

whose original habitat is to be rupted by development.

An outline of Stanford's high plan, which would be incorpoint the new general use perminant and interpretation of the controversial provision for dog owners who bring their onto the trails.

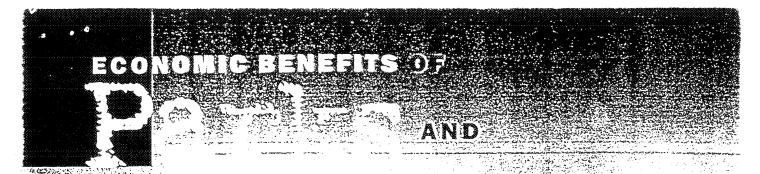
"We hope this will not slow the Camegie project," said H

It would not be the first tin black-and-yellow amphi breeding habits delayed a cor tion project at Stanford.

Five years ago, a dormitor the golf course was held up year while the university and c planners worked out measu deflect roaming salamanders the dangers of construction, ing them to their winter bre spot in nearby Lake Lagunita

In 1993, the eight-inch-lor, phibian, a candidate for endar species protection under a law, drew wide media attowhen Stanford canceled Big bonfires at the lake because they would wipe out eggs laid lakebed mud.

Since then, Stanford has lished a tiger salamander m



How Land Conservation

Helps Communities Grow Smart

and Protect the Bottom Line



ВΥ

STEVE LERNER

AND

WILLIAM POOLE



Introduction

smart" by conserving open space. But accumulating evidence indicates that open space conservation is not an expense but an investment that produces important economic benefits. Some of this evidence comes from academic studies and economic analysis. Other evidence is from the firsthand experience of community leaders and government officials who have found that open space protection does not "cost" but "pays."

This casebook presents data and examples that can help leaders and concerned citizens make the economic case for parks and open space conservation. Some communities protect open space as a way to guide growth and avert the costs of urban and suburban sprawl. In others, new parks have invigorated downtown businesses and neighborhood economies.

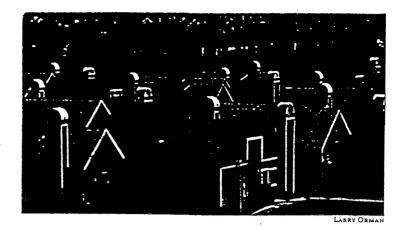
Some communities work to conserve economically important landscapes, such as watersheds and farmland, or they preserve open space as a way to attract tourists and new business. And many communities are learning that conserved open space contributes to the quality of life and community character that supports economic well-being.

Too many community leaders feel they must choose between economic growth and open space protection. But no such choice is necessary. Open space protection is good for a community's health, stability, beauty, and quality of life. It is also good for the bottom line.

By
Will Rogers
President
Trust for Public Land



TPL President Will Rogers.



Increased density saves in Infrastructure costs and contains sprawl.

The Costs of Sprawl Outpace Tax Revenues

Sprawl development not only consumes more land than highdensity development, it requires more tax-supported infrastructure such as roads and sewer lines. Police and fire services and schools also must be distributed over a wider area.

One study found that New Jersey communities would save \$1.3 billion in infrastructure costs over 20 years by avoiding unplanned sprawl development.³

Another predicted that even a modest implementation of higher-density development would save the state of South Carolina \$2.7 billion in infrastructure costs over 20 years. And a third found that increasing housing density from 1.8 units per acre to 5 units per acre in the Minneapolis/St. Paul area would slash \$3 billion in capital infrastructure costs over 20 years.

Many community leaders expect that the taxes generated by growth will pay for the increased costs of sprawl, but in many instances this is not the case.

- In the island community of Nantucket, Massachusetts, each housing unit was found to cost taxpayers an average of \$265 a year more than the unit contributed in taxes. "Simply stated, new dwellings do not carry their own weight on the tax rolls," a town report concluded.
- And in Loudoun County, Virginia—the fastest growing county in the Washington, D.C. area—costs to service 1,000 new development units exceeded their tax contribution by as much as \$2.3 million.⁷
- Studies in DuPage County, Illinois, and Morris County, New Jersey, suggest that even commercial development may fail to pay its own way. In addition to making its own demands on community resources, commercial development can attract costly residential sprawl.⁸



Many communities are saving money and land by encouraging—or even mandating—clustered housing.

In a typical clustered development, homes are built closer together on smaller lots and surrounded by protected open space or conservation land.

Clustered housing is cheaper for a community to service than houses on larger lots, largely because it consumes less land and requires shorter roads, shorter utility lines and less infrastructure of other types.

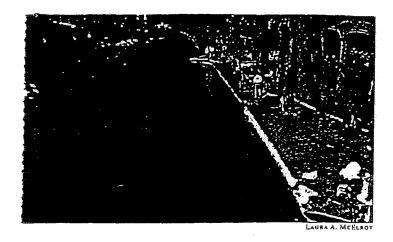
But do people really want to live in clustered housing?

A 1990 study attempted to answer this question for two communities in New England, where sprawl is rapidly overwhelming the original clustered development pattern of houses gathered around a village green and surrounded by farms, forests, and other open space.

Researchers used the rate of real estate appreciation as a measure of consumer demand for homes in two clustered developments in Concord and Amherst, Massachusetts. In both communities the average clustered home appreciated faster than comparable homes on conventional lots.

Clustered housing can allow a community to meet its land protection goals without endangering property values or the tax base while allowing construction of the same number of units, the report suggests.

"The home-buyer, speaking... through the marketplace, appears to have demonstrated a greater desire for a home with access... to permanently protected land, than for one located on a bigger lot, but without the open-space amenity."



The San Antonio Riverwalk is the most popular attraction in the city's \$3.5-billion tourist industry.

Remember the Riverwalk

in the early 1900s, engineers in San Antonio, Texas, planned to bury the San Antonio River to prevent recurrent flooding. But citizens envisioning a riverfront park stopped the project.

Eventually a channel was cut, and floodgates were added to control flooding. Trees and shrubs were planted, and a mile and a half of waikways were added along the shore. Stairways connected the waikways to city streets, and 21 pedestrian bridges spanned the river. Riverside buildings, which had long faced away from the waterway, were given new entrances facing the park.

Created for \$425,000, the park has been enlarged twice, including the addition of new canals and walkways. Today, Paseo del Rio is lined with outdoor cafés, shops, bars, art gallerles, and hotels—an irreplaceable retreat for city residents and workers. The Riverwalk has also overtaken the Alamo as the single most popular attraction for the city's \$3.5-billion tourist industry. 65

"The lake frontage, river frontage, hillsides and ridges—those are the places people want to build homes," says Tom Steinbach, the AMC's director of conservation. "But if communities don't preserve these lands, they will lose their future economic base."

The Impact of Trails and Wildlife Tourism

Hiking and biking trails can also stimulate tourism. Each year 100,000 people come to ride the famous Slickrock Mountain Bike Trail near Moab, Utah. The trail generates \$1.3 million in annual receipts for Moab, part of \$86 million spent by visitors to nearby desert attractions that include Arches and Canyonlands National Parks. In 1995, tourism in Moab supported 1,750 jobs, generated nearly \$1.7 million in taxes, and accounted for 78 percent of the local economy.

Trails along former railroad corridors also pay handsome dividends. In recent years the federal government has invested more than \$300 million in more than 9,500 miles of rail trails in 48 states, and this investment is already paying off. ⁶¹ For example, in Dunedin, Florida, store vacancy rates tumbled from 35 percent to zero after the Pinellas Trail was built through town beginning in 1990. ⁶² In 1994 the Maryland Greenway Commission authorized a study of the 20-mile Northern Central Rail Trail near Baltimore. Researchers found that whereas the trail cost \$191,893 to maintain and operate in 1993, that same year it returned \$304,000 in state and local taxes. ⁶³ In another study, the National Park Service found that three rail trails—in Iowa, Florida, and California—contributed between \$1.2 million and \$1.9 million per year to their home communities. ⁶⁴

Natural open space supports fishing, hunting, and other wildlife-based tourism. Sport fishing alone boosted the nation's economy by \$108.4 billion in 1996, supporting 1.2 million jobs and generating household income of \$28.3 billion.

At present rates of growth, the tourism/ leisure industry will soon become the leading U.S. industry of any kind.

-NATIONAL PARK SERVICE

Sport fishing added \$2.4 billion to state tax coffers—nearly 1 percent of all state tax receipts—while contributing \$3.1 billion in federal income taxes. 66 Another \$85.4 billion is generated for the U.S. economy each year by people who feed birds or observe and photograph wildlife. 67

Funding Resources for Tourists

Recognizing the connection between open space and tourism, some communities have begun taxing tourists to raise funds for park and open space preservation. In 1985 the Montana legislature authorized some small communities that derive a large portion of their income from tourism to levy a sales tax of up to 3 percent on tourist-related goods and services to pay for infrastructure and tourist services, including parks and recreational services. Using receipts from this tax, the town of Whitefish, Montana is building a bike path. 68

Flagstaff, Arizona, is another community that supports parks and land acquisition using funds generated by tourists. Two million tourists visit this community of 50,000 people each year, attracted by nearby Indian ruins, skiing, national forests and Grand Canyon National Park. In 1988, the city passed a 2 percent "bed, board, and booze" tax (known locally as the BBB tax), which currently raises \$3.3 million each year. A third of the money goes to city park improvements, and an additional portion goes to city beautification and land acquisition. The funds are helping to build a 27.5-mile urban trail system connecting neighborhoods, commercial areas, and national forest lands. 69

As travel and tourism swells to become the nation's leading industry within the next few years, communities from coast to coast are coming to see their parks and open lands in a new light. Long appreciated as resources for residents, increasingly they are being appreciated for their attraction to visitors and as economic engines for the next millennium.

In 1996, sport fishing contributed \$7.1 billion to California's economy. East Walker River, Bridgeport, California.

Recreation = Fun + Profit

- ➤ Annual contribution of river-rafting and kayaking to the economy of Colorado: \$50 million 70
- ➤ Amount outdoor recreation adds to the economy of Arkansas each year: \$1.5 billion
- ➤ Amount of this figure contributed by canoe ing: \$20.1 million ⁷²
- ➤ Amount spent by Americans on the purchase of canoes and kayaks in 1996: \$99.1 million ⁷³
- ➤ Amount spent on hiking footwear each yea \$374 million ⁷⁴
- > Contribution of sport fishing to the econom of California in 1996; \$7.1 billion 75.
- ➤ Annual value of hunting, camping, fishing, and horseback riding on federal Bureau of Land Management lands: \$376 million 76

 Annual value of sport fishing on U.S. Forest Service land: \$1.2 billion 77
- Rank of recreation among all economic activities on U.S. Forest Service lands: 278

 Visits to national wildlife refuges in 1995:
- Revenue of local businesses from these vis
- ➤ Income from the 10,000 Jobs supported by these visitors: \$162.9 million \$1.





Country

A Program in Sonta Clara Coan

IV. PRIORITIES FOR OPEN SPACE PRESERVATION 20 2

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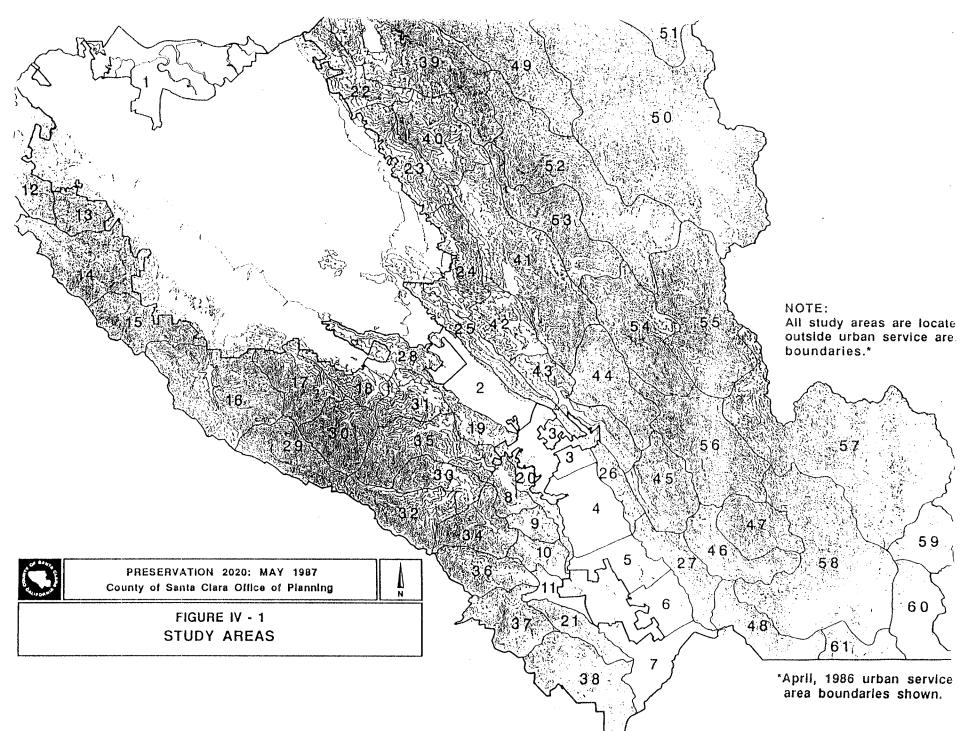
KEY TO FIGURE IV - 1

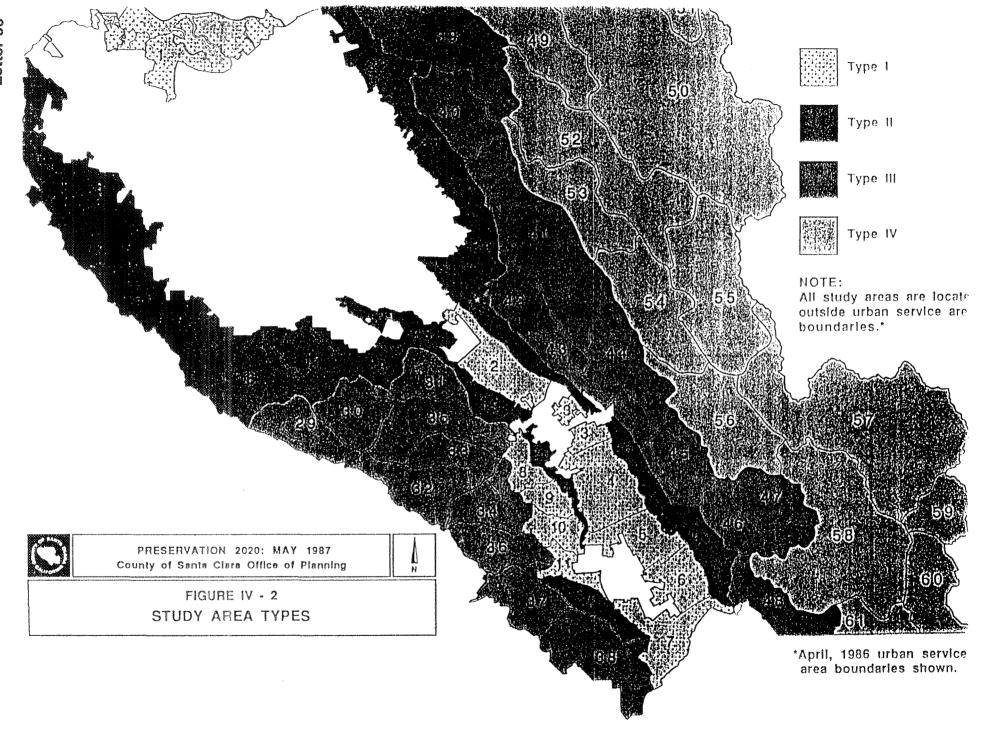
STUDY AREA NUMBERS AND NAMES

	menungana span			5-04-0	ione256
1	BAY ZONE	21	GAVILAN FOOTHILLS	42	SHINGLE VALLEY
2	COYOTE VALLEY	22	E. BERRYESSA FOOTHILLS	43	ANDERSON LAKE
3	MORGAN HILL ENVIRONS	23	ALUM ROCK FOOTHILLS	44	PACKWOOD/LOWER COE
4	SAN MARTIN	24	E. SAN JOSE FOOTHILLS	45	COYOTE LAKE/TIMBER RIDGE
5	LLAGAS	25	E. COYOTE FOOTHILLS	46	CANADA DE LOS OSOS
6	OLD GILROY	26	E. SAN MARTIN FOOTHILLS	47	HUNTING HOLLOW
7	BLOOMFIELD	27	E. GILROY FOOTHILLS	48	SAN FELIPE/PACHECO
8	PARADISE VALLEY	28	SANTA TERESA	49	ALAMEDA CREEK
9	HAYES	29	UPPER LOS GATOS	50	ARROYO VALLE
10	DAY ROAD	30	TWIN CREEKS	51	ARPOYO MOCHO
11	LOWER UVAS	31	CALERO	52	ISABEL
12	LOS TRANCOS/FELT LAKE	32	UVAS WATERSHED	53	MT. HAMILTON/SMITH CREEK
13	PERMANENTE CREEK	33	LITTLE UVAS WATERSHED	54	MID-FORK COYOTE
14	STEVENS CREEK	34	UVAS RESERVOIR/EASTMAN	55	EAST FORK COYOTE
15	SANBORN SKYLINE	35	LLAGAS/CHESBRO	56	GILROY HOT SPRINGS
16	LEXINGTON	36	REDWOOD RETREAT	57	UPPER PACHECO
17	GUADALUPE WATERSHED	37	HECKER PASS	58	LOWERPACHECO
18	NEW ALMADEN	38	PESCADERO/TAR CREEK	59	PACHECO PASS
19	W. COYOTE FOOTHILLS	39	CALAVERAS/ARROYO HONDO	60	SOUTH FORK PACHECO
20	W. VALLEY FOOTHILLS	40	ALUM ROCK WATERSHED	61	VIBORAS
		41	HALLS/SAN FELIPE VALLEY		



Gavilan Foothills and farmlands south of Gilroy.







FEATURES EVALUATED IN CREATING STUDY AREAS

- Landform. Geomorphology is basic to a number of environmental processes and potential environmental impacts. Landform gives clues to soil erosion and deposition, landslides, flooding, and visual vulnerability. Together with orientation to the sun, landform is highly controlling of natural vegetation. Information on landform was derived from U.S. Geological Survey topographic and slope maps at 2000 scale; and from aerial reconnaissance and oblique aerial photography.
- 2. Slope. The slope of the land is closely related to soil erosion, landslides, and visual scarring. Other factors being equal, steep slope exacerbates adverse environmental impacts of development. Slope is also a key factor in agricultural land capability and ease of urban development. Slope information was gained from 1:24,000 topographic maps with slope categories defined photomechanically by the U.S.G.S.
- 3. Geologic conditions and hazards. Information was gained from geologic reports and maps prepared for the County; and active faults, dam failure inundation zones, and designated landslides remapped at 2000 scale.
- 4. Soil. The Soil Conservation Service survey covered most of the study area, omitting the area roughly north and west of Almaden to the County line. Additional County soil maps were available for the area west of the Diablo Range. These reports, maps, and aerial photos at 2000 scale were used as a general source for the following information:
 - o Soil erosion
 - o Septic system suitability
 - o Agricultural land capability
 - o Drainage and depth to groundwater
 - o Groundwater recharge; areas of high percolation
 - o Alluvial soils (flat, valley bottomlands)
- 5. Vegetation. Maps of the Cooperative Soil-Vegetation Survey were used as a general source with more detailed evaluations based on aerial photography. Natural vegetation was taken into account in considering recreational use potential, fire hazard, and visual vulnerability.
- 6. Hydrology. Source: County Planning Office maps and U.S.G.S. topographic maps indicating:

- o Watershed boundaries
- o Perennial and ephemeral streams
- o Groundwater recharge areas
- o Flooding at a 100 year recurrence interval
- 7. Natural habitat. Source: County Planning Office map indicating areas with a wide spectrum of habitat values including areas of riparian vegetation, and soil and plan communities supporting important or endangered species.
- 8. Scenic resources and visual vulnerability General visual conditions were determined from analysis of location, landform, slope, orientation to the sun, and natura vegetation.

Sources included topographic and slope maps at 2000 scale and oblique aerial photography. Criteria for high visua. vulnerability were:

- i. Slope steepness
- ii. Openness of vegetation
- iii. Landform, with vulnerability in descending order:
 - o Sidehills below the military crest (e.g. the line which appears from the valley floor to be the top of the ridge, but which is actually some distance down slope.)
 - o Convex slopes and "noses" (e.g. lateral extensions of ridges into the valleys.)
 - o Ridgelines
 - o Valley floors
- iv. Topographic uniformity
- v. Distance from urban and public use areas, in descending order of vulnerability:
 - o Visibility from the main valley floor
 - o Middle ground, 1/4 to 3 miles
 - o Foreground, less than 1/4 mile
- vi. Orientation to the sun, with the following in descending order of vulnerability:
 - o South through west facing slopes
 - o Southeast and east facing slopes
 - o Flat or gentle slopes:
 - o Northwest through east facing slopes.

FIGURE IV - 3: PARK ACQUISITION PRIORITIES

RANK	STUDY AREA NAME	CRITERIA				
	AND IDENTIFYING NUMBER	PROPOSAL	VULNER-			
			RECRE-	ACCESS/	ABILITY	LAND
			ATION	LOCA-	TO	ASSEM-
			VALUE	TION	DEVEL	BLY
1	BAY ZONE (1)	T,P7	A	Α	Α	A
2	COYOTE VALLEY (2)	P53	A	A	Α	A
3	SANTA TERESA (28)	P35,P55,NP1	В	Α	Α	В
4	NEW ALMADEN (18)	P34,P14,NP1	В	Α	B	С
5	CALERO (31)	P15,NP1	В	Α	B	В
6	LEXINGTON (16)	P12	A	A	B	В
7	LEXINGTON (16)	P33	B	A	В	Α
8	ANDERSON LAKE (43)	P22	В	С	В	В
9	PERMANENTE (13)	P27	В	Α	A	Α
10	LOS TRANCOS/FELT LAKE (12)	P26	С	Α	A	В
11	GUADALUPE WATERSHED (17)	P13,P52	В	A	В	В
12	PARADISE VALLEY (8)	P70	В	A	<u> </u>	В
13	LOWER UVAS (11)	P57	В	В	A	В
14	DAY ROAD (10)	P57	В	В	С	В
15	LITTLE UVAS WATERSHED (33)	P57	В	В	С	В
16	WEST VALLEY FOOTHILLS (20)	P56	В	В	В	В
17	ALUM ROCK FOOTHILLS (23)	P47	В	Α	Α	В
18	STEVENS CREEK (14)	P29,P10	В	В	С	С
19	EAST BERRYESSA FOOTHILLS (22)	P48	<u> </u>	В	Α	Α
20	UPPER PACHECO (57)	P19	A	В	C	<u>A</u>
21	LLAGAS/CHESBRO (35)	P16,P56	Α	С	В	В
22	TWIN CREEKS (30)	P14	Α	С	С	В
23	UVAS RESERVOIR/EASTMAN (34)	P17	В	С	<u> </u>	С
24	COYOTE LAKE/TIMBER RIDGE (45)	P21	В	C	D	A
25	GAVILAN FOOTHILLS (21)	NP2	C	A	B	A
26	CANADA DE LOS OSOS (46)	NP3	В	<u>c</u>	D	A
27	REDWOOD RETREAT (36)	P58	В	C	C	В
28	SANBORN SKYLINE (15)	P31	В	C		A
29	UVAS WATERSHED (32)	P37	A	C	B E	В
30	PACKWOOD/LOWER COE (44)	P40	В	С	C	A
32	HECKER PASS (37) PESCADERO/TAR CREEK (38)	P38 P39	<u>С</u> В	D	D	A
33	LLAGAS (5)	P56	· · · · · · · · · · · · · · · · · · ·	В	C	В
34	OLD GILROY (6)	P56	B B	C	C	В
35	BLOOMFIELD (7)	P57,P59	C	C	C	A
36	HALLS/SAN FELIPE VALLEY (41)	P45	B B	D	D	A
37	ALUM ROCK WATERSHED (40)	P47	C	C	C	A
38	LOWER PACHECO (58)	P60	C	C	В	В
39	CALAVERAS/ARROYO HONDO (39)	P24	В	D	C	A
40	EAST FORK COYOTE (55)	P41	В	E	E	A
41	ARROYO VALLE (50)	P42	В	E	Ε	Α
42	SAN MARTIN (4)	P56	C	В	В	D
43	PARADISE VALLEY (8)	P56	С	В	Α	Ε
44	GILROY HOT SPRINGS (56)	P40	D	С	D	A
45	MID-FORK COYOTE (54)	P40	С	D	D	Α
		1			E	Λ .
46	ALAMEDA CREEK (49)	P24	В	E		A

IV. PRIORITIES FOR OPEN SPACE PRESERVATION

10. DAY ROAD (3,200 acres)

This area is a broad, flat area surrounded by steep slopes on the north, east, and west. The center of the valley is subject to risk from dam failure at Uvas Reservoir. Parcels are large, except along Watsonville Road.

Open space serves watershed, viewshed, urban buffer and natural and archeological resource preservation functions. The proposed Uvas Creek Trail and Park Chain are given a moderately high priority because of the relatively high value of the stream as a resource in this area, and because of high vulnerability to development. Because of the significant natural and archeological resources of the area and its vulnerability to development, this area is given a moderately high rank for open space acquisition. An open space assessment district would be appropriate for this area.

II. LOWER UVAS (2,400 acres)

The lower Uvas Valley is flat except in the northwest corner. It borders the Gilroy urban service boundary and is crossed by Highway 152; so it will be under considerable development pressure. Some of the Hillside recommendations may be appropriate for the hilly portion of the study area. The historic cedar trees along Highway 152 warrant special protection, as does the riparian habitat along Bodfish Creek. This area ranks moderately high for both park and open space acquisition.

12. LOS TRANCOS / FELT LAKE (8,400 acres)

Located to the southwest of Palo Alto and Stanford University, this study area consists primarily of steep, heavily wooded slopes from the foothills to the crest (county line) of the Santa Cruz Mountains. Substantial portions of this area are protected as either Midpeninsula Regional Open Space Preserves or City of Palo Alto Parks. The historic Hidden Villa Ranch complex is located along the eastern side of this area. Private outdoor recreation programs for children are provided at Hidden Villa.

The proposed Hidden Valley County Park is assigned a moderately high acquisition priority. The northern portion of this area (Hidden Villa Ranch) is protected by an open space easement held by MROSD. The flatter, more accessible portions of the valley could provide an array of public recreation opportunities.

Open space protection in this area would provide an urban buffer, watershed and viewshed protection. Primary means of protection would be through the riparian and current slopedensity regulations, Williamson Act contracts, and acquisitions. Because of its high scenic values and proximity to existing public open space lands, this area hbeen assigned a high priority for open space acquisitic Stanford University's plans and policies for the undeveloplands it owns in this area should continue to be monitor by the County to ensure the protection of these open spa areas where feasible.

13. PERMANENTE CREEK (4,300 acres)

This study area lies between the urban service a boundaries of Los Altos Hills and Cupertino and the cres Montebello Ridge. It consists of rolling to steep terrain the heavily vegetated hillsides of the Santa Cruz Mountain

Several preserves of the Midpeninsula Regional Open Sp District and Rancho San Antonio County Park are founthis study area. The major land use besides parks and c space is the Kaiser Permanente limestone quarry locate the east side of this study area. The Montebello Ridge contains significant amounts of native vegetation consider archetypical of the Santa Cruz Mountains.

Open space protection would serve watershed, views natural area and urban buffer functions. Protection met would be a combination of slope-density and rip regulations, Williamson Act contracts and acquisitions. proposed expansion of the Rancho San Antonio C. Park was assigned a moderately high priority for acquisition. Corporate land use policies for the quarry should be monitored to ensure maintenance of the space buffer around it.

14. STEVENS CREEK (13,100 acres)

The Stevens Creek study area stretches from Cupe urban service area boundary to the county line at the s of the Santa Cruz Mountains. The majority of the very steep and heavily wooded. The Stevens Creek (contains archetypical native vegetation representa pristine riparian communities of the Santa Cruz Mot This area has a state designation as a significant natur Two major County parks (Stevens Creek and Upper Creek) and several MROSD preserves are located study area. In addition, one of the oldest rural commin the county is located in the Stevens Creek Canyon

A moderately high priority rating has been assigned area for park acquisition in reference to proposed exto footh County parks as indicated in the County Patholic Other open space acquisitions receive a moderate priority rating, reflecting the area's high value for volumershed, urban buffer and natural area functions. Powould come from a combination of the existing density regulations, riparian corridor regulation

The

San Francisco Bay Area Conservancy Program

Regional Needs Briefing Book



prepared by the

BAY AREA OPEN SPACE COUNCIL

April 5, 1999

About this Publication...

This Briefing Book has been prepared by the Bay Area Open Space Council, a cooperative effort of nearly 40 public agencies and land trusts with responsibilities to acquire, preserve, restore and manage permanently protected open space lands in the San Francisco Bay Area. The purpose of the Briefing Book is to provide an overview of the preservation themes and needs of the nine-county region. The information contained in this publication is derived from adopted plans and policies, published reports, and discussions with key professionals. This Briefing Book is thus a compilation and interpretation of the individual plans and policies of numerous agencies and organizations, and does not replace or modify the plans and policies of any individual agency or organization. Financial support for the preparation and distribution of this Briefing Book has been provided by the Walter and Elise Haas Fund and the members of the Council. Questions or comments regarding this publication should be directed to John Woodbury, Program Director, Bay Area Open Space Council at the address below.

Map Credits

All maps, with the exception of the Ridge Trail map, are the work of the Bay Area Open Space Council and its members, working in cooperation with GreenInfo Network.

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South Livermore Valley Agricultural Land Trust
Sonoma County Agricultural Preservation and Open Space District
U.S. Fish and Wildlife Service



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What We've Learned...

Through a combination of low-tech data collection, high-tech computer mapping, and analysis and review by the best professional expertise in the region, we now know some very powerful facts about the San Francisco Bay Area:

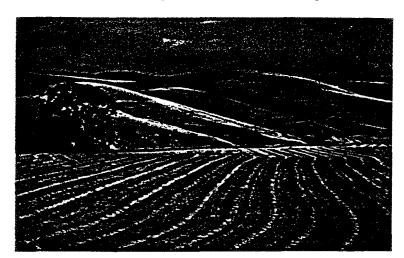
We've Done a Lot.

The Bay Area currently has about 950,000 acres of permanently protected open space, ranging from city parks to natural habitats to cultivated farmland. That's about 20 percent of the total land area of the nine counties.

The Old Ways Are Changing.

Conservation easements (both purchased and donated) now account for about 8 percent of all permanently protected open space. That's up from about 5 percent in 1992. Most signifi-

cantly, during the 1990's easements have accounted for about half of all new acres protected. Most of these easements have had protection of agriculture as a primary purpose, though many are also designed to preserve habitat, water quality, viewsheds, and community open space buffers.



Despite Our Best Efforts, We're Not Keeping Up.

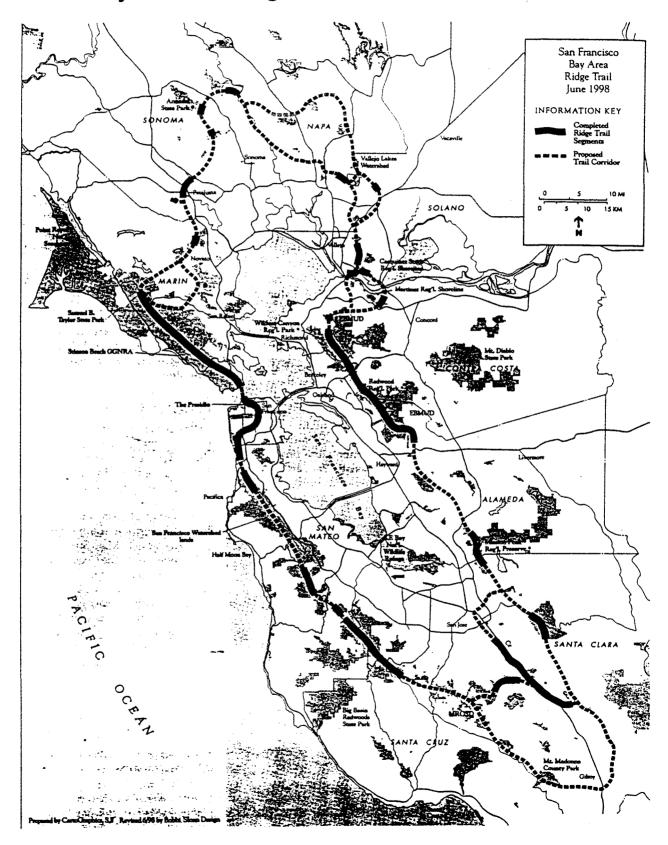
During the 1990's we've been adding permanent protection to open space lands at a rate of about 10,000 to 15,000 acres per year. That represents an increase of between 1.1 and 1.6 percent per year. By contrast the population of the Bay Area has been increasing at a rate of nearly 2 percent per year. Bottom line: Our recent efforts to permanently protect open space are not keeping pace with population growth. Stated another way: The amount of permanent open space per person is declin-

ing.

It's Getting Harder to Get Away From It All.

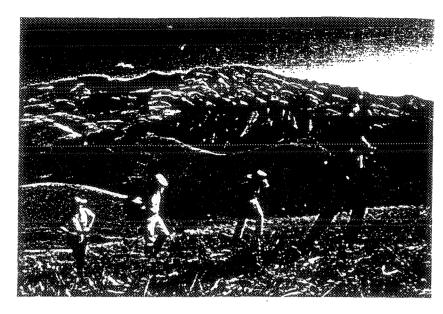
Considering that most agricultural and conservation easements have limited or no public access, and that many of the wetlands and other critical habitats which we have been acquiring also have little or no public access, the rate at which we've been adding publicly-accessible open space protection is only about one-third the rate of population growth.

The Bay Area Ridge Trail



Goal

Complete the Bay Area Ridge Trail and the system of connecting trails



The non-profit Bay Area Ridge Trail Council is the

prime advocate for a continuous trail system circling the bay and linking the main ridges rising from the bay. Most segments of the trail which pass through existing public lands have been designated and identified through signage by the respective public agency owners. Where private property is involved, broad corridors through which the trail would pass have been identified, and most of the relevant public agencies have conceptually adopted these corridors.

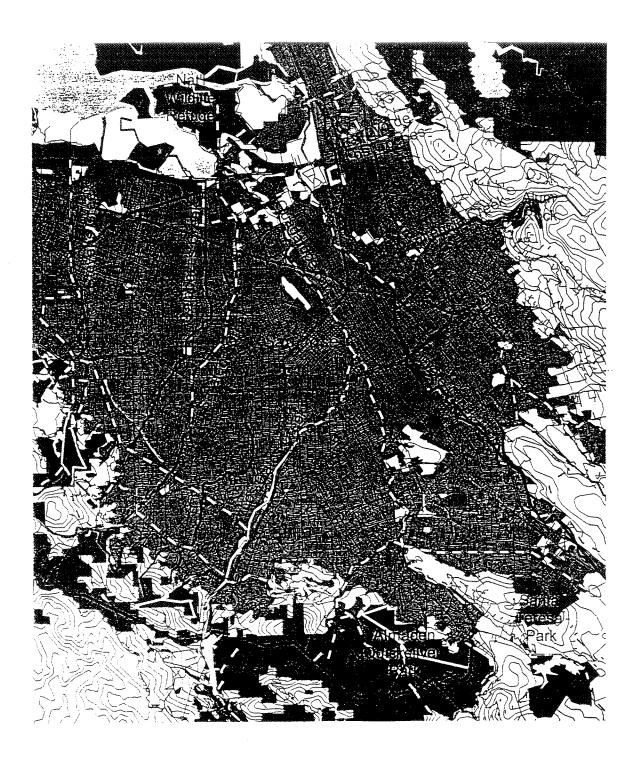
In many of the areas where gaps in the trail remain, the race is on between threats of development and efforts to protect needed open space lands and secure trail right of ways. Although there is broad public support for the Ridge Trail, property owners have in some cases sought to block efforts to secure trail right of ways. Also, the SF Public Utilities Commission has so far refused to permit location of the Ridge Trail along the most attractive alignment in their Crystal Springs Reservoir watershed, citing water quality concerns

Numerous local park and recreation agencies, cities and counties have endorsed the concept of the Ridge Trail, and are actively working to close remaining gaps.



The establishment of the Bay Area Conservancy Program within the Coastal Conservancy means there is now an institutional structure for implementing the Ridge Trail in those areas where there is no local agency to do the job.

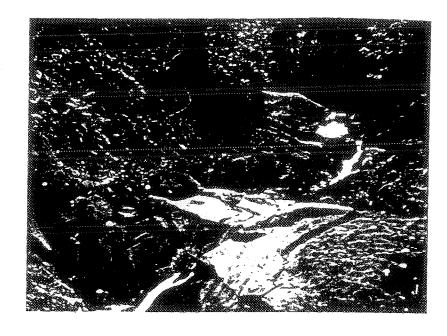
SIGNIFICANT STREAMS AND TRAILS--SANTA CLARA COUNTY DETAIL



Goal

Preserve and restore bay area streams and watersheds

After 150 years of urbanization, channelization, culverting and misuse, bay area streams have lost much of their habitat, recreational



and aesthetic value. Many streams today function as little more than storm water conveyance systems, effective only at transporting water runoff, sediments, toxic chemicals and other pollutants to the bay and ocean.

Amazingly, however, salmon can still be found struggling up Coyote Creek in the heart of San Jose, up Walnut Creek past oil refineries, and up many other less impacted streams. Our riparian corridors still provide crucial habitat and habitat linkages, and streamside trails give many city residents their one remaining taste of nature close to home.

Most exciting of all, there are today numerous homegrown creek protection groups, and what were once single-purpose flood control agencies are joining forces with these citizen groups and with regulatory agencies to preserve and restore the water quality, habitat and recreational benefits of our bay area streams. This new watershed management approach is encouraged by the federal Clean Water Act and other environmental laws.



Some restoration and protection can be accomplished through the proper design of new developments and through mitigation requirements.

However, new sources of funding are needed to be able to comprehensively correct past mistakes, restore habitat and provide trails that reconnect the urban population to our streams.

Bay Area Conservancy Program

Page 27

FINAL ENVIRONMENTAL IMPACT REPORT FOR THE

Cayetano Corporate Campus

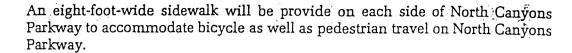
Planned Unit Development #131, General Plan Amendment #74-97 And Development Agreement #114-97

SCH# 97062005

CITY OF LIVERMORE

October 12, 1998





Section 4.2, BIOLOGICAL RESOURCES

The last paragraph on page 4.2-2 of the Draft EIR is revised as follows:

301-Acre Shea Property - The vegetation on the 301-acre Shea property is similar to the 130-acre project site, consisting primarily of non-native grassland habitat. No riparian habitat occurs within either the eastern drainage or Collier Canyon Creek within the property boundaries. These drainages have been extensively degraded by historic cattle grazing. The eastern drainage is identified on the U.S. Geologic Survey V.5 minute topographic map of the area as a "blue-line" stream (i.e. blue-line streams are considered "waters of the United States" for purposes of regulation under the tederal Glean Water Act) along its entire length through the project site. This blue-line designation of the eastern drainage continues for approximately // mile north of the site boundary. From its northern headwaters, the eastern drainage progresses from a small, grass-covered swale to a deeply-incised channel as it enters Arroyo Las Positas. The drainage has been extensively degraded by historic cattle grazing and is devoid of riparian vegetation along its entire length. A wetland delineation completed by Zander Associates (June 1997) identified 0.32 acre of wetlands within the eastern drainage. A wetland delineation has not been completed for the portion of Collier Canyon Creek within the eastern portion of the 301-acre Shea property, but it is estimated not to exceed 0.05 acre.

The biotic resources value of the project site's grassland habitat and its potential to support sensitive plant species was assessed by the EIR preparers through a review the previous reports prepared for the site and a reconnaissance-level field survey at the reports that are relevant to sensitive plants are listed on page 4.2-hof the Draft EIR and include the following: Description of Existing Biological Resources, Shea Genter Livermore Project Site (Zander Associates letter to Kevin Peters July 17, 1997). North lavermore General Plan Amendment Draft EIR (Willdan Associates June 1993), and Initial Study/Proposed Mitigated Negative Declaration Site Development Infrastructure Las Positas College (Interactive Resources and Michael Glayton and Associates; 1997). The Zander Associates report concluded that over a five year period of surveying the project site, no annual wildflower displays were observed.

Exhibit 4.2-2 on page 4.2-12 of the Draft EIR is revised as shown on the following page.

The text following Mitigation Measure 4.2-2 on page 4.2-21 of the Draft EIR is revised as follows:

Mitigation 4.2-1

Loss of Non-Native Grassland Habitat - The project applicant shall:
(1) dedicate conservation easements on approximately 23 39.4 acres of hillside and drainage corridor open space; (2) pay a fee to fund open space preservation and management in the adjacent North Livermore area; and (3) conduct pre-construction burrowing owl surveys.

As a condition of approval of the first tentative map, a minimum of approximately 33 39.4 acres, comprising the hill in the northeast corner of the 301-acre Shea property (above approximately the 500 foot elevation contour) plus a minimum 150 foot-wide corridor along the entire length of the eastern drainage, shall be permanently preserved and maintained as open space through the dedication of an open space easement or in some other manner acceptable to the City.

The project shall be subject to a fee, in an amount to be established through a Development Agreement entered into between the Gity and the project applicant, which will be utilized for preservation and/or management of non-native grassland habitat in the adjoining North-Livermore planning area. The funds shall be administered in conjunction with the North Livermore Open Space Program, including the BRMP, upon its adoption.

The grassland habitat mitigation fee will be \$600,000. Of this total fee, \$100,000 will be paid at the issuance of the first grading permit for the proposed project and \$125,000 will be paid annually on the anniversary of the first grading permit for the preservation of kit fox suitable grassland habitat mitigation fee will be jused for the preservation of kit fox suitable grassland habitat within the North Livermore area. The habitat mitigation fee will fund (1) acquisition and management of grassland habitat within the framework of the North Livermore Biological Resources Management Plan (BRMP); and (2) early start-up of and on going program administration by the Habitat Lands Management Poundation that is to oversee the habitat management areas and implementation of the BRMP component of the North Livermore Rural Lands/Open Space Program. The majority of the mitigation fee will be used for acquisition, in fee or easement, of kit fox suitable grassland habitat within the North Livermore area.

The Habitat Lands Management Foundation is to oversee the acquisition enhancement and management of proposed habitat management lands. The foundation will be an autonomous non-profit corporation with Federal and State tax-exempt status. The Foundation will purchase or accept donations of lands in the North Livermore Specific Plan area, in fee or easement, that will further the goals of the Specific Plan and BRMP. The habitat mitigation fees and habitat management fees that will be required to be paid by urban development in the North Livermore Specific Plan area, plus the grassland habitat mitigation fees required to be paid by the proposed project; will be used to fund purchases of land and easements.

The City of Livermore and County of Alameda have initiated the North Livermore open space program in advance of Specific Plan approval. Specifically the Gity and Gounty have entered into a partnership with the Trust for Public Land (UPL) ito undertake early acquisition of habitatilands in the North Livermore project area prior to approval of the North Livermore Specific Plan and as funding becomes available. A grant application has been made to the U.S. Bureau of Reclamation and U.S. Fish and Wildlife Service under the Central Valley Program for funds to acquire land in the alkalising portion of the BRMP. It is anticipated that as mitigation fees become available from the Cayetano Corporate Campus project TPL can use those funds to immediately acquire options or parcels in fee or easement within the designated open space areas of the North Livermore Specific Plan which would be stutable grassland replacement habitat.

If within 5 years following the initial payment of mitigation fees, replacement habitat has not been acquired or othewise preserved on grassland habitat shall be preserved at a 3:1 ratio elsewhere in Alameda County in a location acceptable to the CDFG and USFWS.

Mitigation Measure 4.2-2 on pages 2-7 and 4.2-22 of the Draft EIR is revised as follows:



Loss of Jurisdictional Wetlands - Prior to issuance of a grading permit, the wetland acreage on the project site shall be delineated by a qualified biologist to determine the extent of jurisdictional wetlands that would be affected by the proposed project. All proposed discharges of dredge or fill material into waters of the United States must first be authorized by USACE, pursuant to Section 404 of the federal Clean Water Act. Issuance of a Streambed Alteration Agreement by the California Department of Fish and Game shall occur for anticipated channel modifications within the eastern drainage.

A wetland mitigation plan shall be prepared for USACE that quantifies the total acreage lost, and describes the creation/replacement ratio for acres filled, annual success criteria, potential mitigation sites, and monitoring and maintenance requirements. Mitigation could be accomplished on the site, offsite, or using a combination of both. The plan shall be prepared by a qualified wetland biologist through consultation with USACE. Because total fills are expected to be less than 3 acres, the project would qualify under the USACE Nationwide Permit Program.—The replacement of wetlands shall be sufficient to ensure no net loss of wetland habitat value.

Additionally, access to properties east of the eastern drainage shall only be provided from North Canyons Parkway. No future additional crossings of the eastern drainage shall be permitted.

Section 4.7, TRAFFIC AND CIRCULATION

Mitigation Measure 4.7-7 on pages 2-17 and 4.7-47 of the Draft EIR is revised as follows:



Transit Routes -The project sponsor and City shall work with LAVTA to ensure that Wheels Route 12/12X is extended into the project site. In order to offset LAVTA's additional operating costs to serve the project site, the project applicant shall establish a mechanism to fund operating cost expenses in perpetuity. Arrangements are in place with the Hacienda Business Park and Koll Center in Pleasanton and are being conditioned for the Opus development in Dublin that require the office park operator to pay a monthly fee in exchange for flash passes for office park employees. Based on preliminary discussions with LAVTA, the monthly fee for the project site is not to exceed \$500 for a total allocation of \$33 transit trips, plus \$0.60 per trip thereafter. Employees would be provided transit passes valid on all LAVTA routes; mo fare would be collected. In addition, LAVTA and the POA (or employer) would work together in marketing activities to promote ridership \$1,000 at buildout. A similar fee structure program would be necessary with development of the larger Shea property.



Development Agreement for Cayetano Corporate Campus Exhibit 6.1: Open Space and Biological Resource Mitigation

- A. Dedication of Conservation Easements. Development of the Property shall be subject to the following conditions requiring the dedication or offer of dedication to the City of the following conservation easements:
 - 1. Hillside Conservation Easement. Issuance of the first grading permit for the Property shall not occur until Landowner has dedicated to the City a conservation easement, in a form acceptable to the City, covering those approximately 29.4 acres located within the Remainder Property and described on Attachment 6.1.1, attached hereto.
 - 2. Drainage Corridor Conservation Easement. Issuance of the first grading permit for the Property shall not occur until Landowner has recorded an offer to dedicate a conservation easement, in a form acceptable to City, covering those approximately 10.0 acres located within the Remainder Property along the eastern drainage corridor and described on Attachment 6.1.2, attached hereto. Such offer shall remain open until, and City shall accept the offer of dedication upon, completion to City's satisfaction of all required flood control improvements and construction of such portion of the multi-use trail as will be located in such area, all as required by the PUD Permit.
- 8. Contribution to Open Space Acquisition Fund. Landowner shall pay a total of \$600,000 to the City's "Open Space Acquisition Fund" in the following installments: An initial payment of \$100,000 shall be made prior to issuance of the first grading permit for the Property. Landowner shall make four additional payments, each in the amount of \$125,000, which payments shall be made on the first, second, third and fourth anniversaries, respectively, of the date of issuance of the first grading permit for the Property. All of these funds shall be used by City to implement the open space program being developed for the North Livermore area.

3.2 ESTABLISHMENT OF HABITAT MANAGEMENT LANDS

The Conservancy will oversee the acquisition, establishment, and management of the habitat management lands. The Conservancy staff will include a part-time consulting biologist with range management experience to ensure that habitat management activities are implemented in accordance with the RCP.

The following criteria will be used to identify high priority lands for acquisition to implement the goal of establishing habitat management lands.

- A large contiguous area that could ultimately be managed as a unit and in a
 manner to support higher habitat values for wetland and grassland dependent
 species (e.g., burrowing owl, California tiger salamander, California red
 legged frog, palmate-bracted bird's beak and San Joaquin kit fox) which
 occur in Plan Area or the surrounding region.
- Lands that could be enhanced or conserved for use by species which do not presently occur within the Plan Area.
- Lands in Zones A, B, C and D that are known to support special status species (e.g., California tiger salamander and California red-legged frog) and are likely to be impacted by development.
- Opportunity to connect the potential habitat management lands to other large, contiguous open space areas that support special status species, including the Los Vaqueros Watershed Lands and Brushy Peak.
- Occurrence of lands containing existing habitat for special status species, and that have the potential to be managed for higher habitat values.
- Presence of conditions that are essential to the long-term sustainability of the proposed Bird's Beak/Alkali Sink Reserve. Portions of the eastern region of the Plan Area contain concentrations of salts and borons that are essential to long-term sustainability of the bird's beak habitat.
- Where a buffer is necessary between agricultural lands and habitat management lands, the buffer shall occur on the potential habitat management lands.

The RCP is designed to encourage the co-existence of agricultural uses with habitat management practices to:

- Ensure that potential habitat management lands can be managed in a manner that protects existing biological resources and enhances habitat for wildlife.
- Ensure that habitat management strategies are designed to accommodate ongoing agricultural activities. In most cases, the RCP will not have

- participation requirements that will restrict agricultural enterprises in a manner that would impede the long-term viability of the agricultural areas.
- Ensure that the purchase of land in fee and sale/lease-back to the agricultural community are consistent with the habitat management objectives of the RQP.

3.3 RESOURCE CONSERVATION FEE PROGRAM AND FUNDING

The RCP authorizes the collection of fees from urban development in Zone A through the "Resource Conservation Fee Program" to fund the mitigation of biological, open space, and agricultural resource impacts resulting from new urban development in the Plan Area. The collected funds will be used to secure large contiguous rural/open space lands for habitat and agricultural management. Protection of lands surrounding the urban area will also prevent or limit growth inducing impacts by containing development within designated urban areas.

The Resource Conservation Fee Program is critical to the overall success of the RCP. Developers of land in Zone A will be required to contribute \$25,000 per residentially developed acre (excluding arterial roads, parks, creek corridors and schools) as a mitigation fee for the loss of habitat, open space and agricultural lands in Zone A. The \$25,000 per acre fee shall be equivalent to 1999 dollars and adjusted by the City for inflation based on the San Francisco Bay Area All Urban Consumers, or subsequently adopted, price index. Payment of the fee shall occur prior to recording of final map. Although the \$25,000 fee will fund the acquisition of land for rural/open space preservation, habitat management, and wetlands mitigation, landowners impacting wetlands habitat or other sensitive resources such as special status species will be required to separately fund the creation of wetland or other mitigation needed to offset the impacts caused by their specific development projects.

Funds generated by the Resource Conservation Fee collected from Zone A developers will be used to acquire lands from willing sellers in fee or in easement to preserve existing open space and agricultural lands as part of the habitat management lands. The Conservancy will prioritize the purchase of such lands in a timely manner to assure adequate mitigation is available to offset impacts of each specific development project in Zone A at the time such development is approved. When easements are purchased, they will be individually designed for each property owner to continue agricultural practices consistent with the RCP. The Conservancy will also use the Resource Conservation Fees to fund the creation of habitat and ongoing maintenance and monitoring activities described in Chapter Five.

pproximately \$50 million dollars (including the value of dedicated lands). d on the Open Space Feasibility Study accepted by the Livermore City icil and Alameda County Board of Supervisors by the Joint Planning Staff in 1996, this funding should be sufficient to protect up to 8,300 acres within the Area (see Table 1, Resource Conservation Phasing below).

tional funding for the RCP will be generated from a combination of sources ding mitigation fees (approximately \$3 million) on development outside of forth Livermore Plan Area (e.g., Shea Center Livermore); grants oximately \$1 million); and donations and memberships in the Conservancy. Bity has already been granted \$70,000 from the Bureau of Reclamation and Fish and Wildlife Service toward the purchase of lands in the Bird's Beak area adjacent to the Environmental Park.

Table 1: Resource Conservation Phasing

Year	Estimated Dollars to Conservation Fund	Cumulative Dollars to Conservation Fund	Approximate Acres in Easement	Cumulative Acres in Easement	
	\$0	\$0	1,000 1	1,000	
	\$6,000,000	\$6,000,000	1,000 2	2,000	
	\$12,500,000	\$18,500,000	2,100	4,100	
	\$12,500,000	\$31,000,000	2,100	6,200	
	\$12,500,000	\$43,500,000	2,100	8,300	

e 1,000 acres acquired at Year 1 will be dedications from urban developers at will offset some of their Resource Conservation Fee obligation. Hence a reduced funding shown at Year 5 and the reduced overall expenditure tal.

lculated at 600 homes per year at 6 units per acre and \$6,000 per acre erage easement cost.

birds. The limits of jurisdiction in non-tidal creeks such as the portion of San Francisquito Creek in the project area are determined by the ordinary high water mark (OHWM). San Francisquito Creek below the OHWM would be defined as "waters of the United States" and therefore under Corps jurisdiction. Other waters such as wetlands require field delineation and a determination of jurisdiction. Fills may be permitted by the issuance of an Individual Permit or by complying with existing general permits ("Nationwide Permits"). Fills of less than one acre in non-tidal waters subject to average annual flows of less than five cubic feet per second, adjacent wetlands, and isolated wetlands can occur without notification to the Corps if in compliance with the conditions of the previously issued Nationwide Permit #26. However, nationwide permits cannot authorize fill that would jeopardize the continued existence of a threatened or endangered species, or that would destroy or adversely affect their critical habitat. Compliance with the Clean Water Act regulations will be required for widening of the Sand Hill Road Bridge, which may meet the conditions for Nationwide Permit #26 if designed and constructed appropriately.

Clean Water Act - 401

Section 404 of the Clean Water Act requires that a section 401 certification or waiver must be obtained from the Regional Water Quality Control Board (RWQCB) to qualify for a Nationwide Permit from the Corps. This will be required as a condition for any Nationwide Permit for the proposed Sand Hill Road Bridge.

Migratory Bird Treaty Act of 1918

Under 16 U.S.C. 703-711, the Migratory Bird Treaty Act makes it "unlawful to take" any migratory bird listed in 50 C.F.R. part 10, including "nests, eggs, or products." This regulation is pertinent to any tree removals required for the proposed projects that could affect nesting migratory birds. Migratory bird species observed in the vicinity of the projects are listed in Table 4.7-1.

Endangered Species Act (ESA)

The federal Endangered Species Act is administered by the U.S. Fish and Wildlife Service (USFWS). Section 3 of the Act defines an *endangered* species as any species, including subspecies, "in danger of extinction throughout all or a significant portion of its range." This section defines a *threatened* species as any species "likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range." Federally-listed" or "listed" indicates that a species has been designated as endangered or threatened through publication of a final rule in the *Federal Register*. Designated endangered and threatened species, listed under Section 4 of the Act, receive the full protection of the ESA (footnote 7, as per text). This regulation could be applicable to the proposed Sand Hill Road widening project if it resulted in significant impacts to a federally-listed species such as the California red-legged frog.

Proposed endangered and threatened species are those for which a proposed regulation, but not a final rule, has been published in the *Federal Register*. These species are not fully protected, but they could be listed at any time with publication of a final rule.

The USFWS recently changed its policy on candidate species. The term candidate now refers strictly to former Category 1 species for which the USFWS has sufficient information on biological vulnerability and threat(s) on file to propose listing as endangered or threatened, but for which proposed or final rules have not been published in the Federal Register. However, development and publication of proposed rules for candidate species could be anticipated at any time. The USFWS encourages consideration of these species in project planning, as they may become listed species in the future.

Federal species of concern are former Category 2 species for which listing as endangered or threatened is possibly appropriate, but for which sufficient data on biological vulnerability and threat(s) are not currently available to support a listing proposal. The USFWS does not regard these species as candidates for listing, but remains concerned about them and is working to assess their need for protection under the Act. The USFWS encourages consideration of these species in project planning, as they may become candidate species in the future.

State of California Regulations

Endangered Species Act (CESA)

The California Endangered Species Act declares that deserving species will be given protection by the State because they are of ecological, educational, historical, recreational, aesthetic, economic, and scientific value to the people of the State. CESA established that it is State policy to conserve, protect, restore, and enhance endangered species and their habitats.

Under State law, species may be formally designated rare, threatened, or endangered by official listing by the California Fish and Game Commission. ¹⁰ Listed plants are generally given greater attention during the land use planning process by local governments, public agencies, and landowners than are plants that have not been listed.

Species listed under the California Endangered Species Act (Fish and Game Code Section 2050 et seq.) cannot be "taken" without adequate mitigation and compensation. At present, "take" means to hunt, pursue, catch, capture or kill, or to attempt to do so. Based on the most recent Findings of the California Attorney General's Office, "take" does not prohibit indirect harm by way of habitat modification. Typically, CDFG implements endangered species protection by entering into management agreements ("Section 2081 Management Agreements") with project applicants.

The provisions of the California Endangered Species Act are not directly relevant to the project at this time, because none of the sensitive species likely to occur in the project area (Table 4.7-2) are listed under the California Endangered Species Act. It is possible, however, that one or more of those species could be listed during the life of the projects.

⁹ U.S. Fish and Wildlife Service. Federal Register, 50 CRF, Part 17, Wednesday, February 28, 1996.

Gould Publications, Inc., 1986 through 1990. Fish and Game Code of California. "Chapter 1.5, Endangered Species," Sections 2050 through 2098.

TABLE 4.7-2 SENSITIVE WILDLIFE SPECIES AND SENSITIVE HABITATS REPORTED TO OCCUR IN THE SAND HILL CORRIDOR PROJECTS AREA AND VICINITY¹

Common Name	Sclentific Name ^t	Status² (Fed/CA)	Season³	Primary Habitat ⁴	Present On-Site ⁵	Comments
			HABI'	rats		
Valley oak woodland	Dominant Species: Quercus lobata	/G3; S2.1 Very Threatened	N/A	San Francisquito alluvial fans in the vicinity of Palo Alto	S	Isolated valley oaks are present
Central coast live oak riparian forest	Dominant Species: Quercus agrifolia, Rubus ursinus, Salix spp.	/G3; S3.2 Very Threatened	N/A	Floodplains along perennial streams	O	Adjacent to San Francisquito Creek
			FIS	SH		
Steelhead trout	Oncorhynchus mykiss	PE/CSC	Winter and Spring	Freshwater tributaries to San Francisco Bay	0	Passes through project in Winter and Spring migration
			AMPHI	BIANS		
California tiger salamander	Ambystoma californiense (= A. tigrinum)	FSC/CSC	Resident	Breeds in ponds without predators	υ	Breeds at Lake Lagunita, within one mile of the golf course. CDFG considers upland and creek habitats of project site unsuitable.
California red- legged frog	Rana aurora draytonii	FT/CSC	Resident	Permanent sources of water, chiefly ponds	0	Observed in San Francisquito Creek upstream of Alpine Road, within 1-1.5 miles of project sites
1			REPT	ILES		
Northwestern pond turtle	Clemmys marmorata marmorata	C3C/CSC	Resident	Pools	0	Observed in point segments 21 to 22 behind Oak Creek Apartments, San Francisquito Creek
			BIR	DS		
Northern harrier	Circus cyaneus	/CSC	Resident	Forages in grassland, nests in riparian habitat	0	
Sharp-shinned hawk	Accipiter striatus	/CSC, ABL 1972-86	Resident	Open woodlands and wood margins	0	May nest in or near riparian habitats bordering open hunting terrain

Common Name	Scientific Name ¹	Status² (Fed/CA)	Season ³	Primary Habitat ^e	Present On-Site ⁵	Comments
Cooper's hawk	Accipiter cooperi	/CSC	Resident	Forages and nests in riparian habitat	0	
Yellow warbler	Dendroica petechia	/CSC	Summer	Riparian trees and shrubs	0	Species recorded by San Francisquito Creek Stream Inventory. Nests mid April-August

NOTES:

Scientific names are based on the following sources: AOU 1983, Jennings 1983, Hickman 1993, Zeiner et al. 1990.

Status of species relative to the Federal and California State Endangered Species Acts and Fish and Game Code of California. ² Status

Federal status. Fed

Federally listed as threatened. T

Candidate species refers to former Category 1 species for which the USFWS has sufficient information on biological vunerability and threat(s) on file to propose Clisting an endangered or threatened, but for which proposed or final rules have not been published in the Federal Register.

Federal species of concern are former Category 2 species for which listing as endangered or threatened is possibly appropriate, but for which sufficient data **FSC** on biological vunerability and threat(s) are not currently available to support a listing proposal.

Subcategory 3C comprises taxa proven to be more abundant and/or widespread than previously thought. Should new information suggest that any such taxon C3C is experiencing a numerical or distributional decline, or is under a substantial threat, it may be reevaluated for possible inclusion as candidates.

Taxonomically invalid. СЗь

California status. CA

California Department of Fish and Game "Species of Special Concern". Species with declining populations in California. CSC

Audubon Society Blue List of Birds of Special Concern. ABL

No status.

Global Rank - a reflection of the overall conditions of an element throughout its range (Scale 1 Least Secure - 5 Most Secure) Very Threatened. G

21-100 element occurrences. OR 3.000-10.000 individuals. OR 10.000-50.000 acres. G3

6-20 element occurrences, OR 1,000-3,000 individuals OR 2,000-10,000; Very Threatened. S2.1

21-100 element occurrences, OR 3,000-10,000 OR 10,000-50,000 acres; Threatened. S3.2

State Rank assigned in same manner as Global Rank, also contains a threat designation (Scale 1 Least Secure - 5 Most Secure) Threatened S

Season of use for animals. Resident; Summer; Winter. 3 Season

4 Primary habitat = Most likely habitat association.

⁵ Present on-site:

0 Observed on-site.

S Suitable habitat on-site.

U Unsuitable habitat on-site. (Habitat to support the species does not occur.)

SOURCE:

California Department of Fish and Game Natural Heritage Division, California Natural Diversity Database, 1995; San Francisquito Creek Stream Inventory, 1995. Coyote Cre Riparian Station, Alviso, CA.

California Environmental Quality Act- Treatment of Sensitive Plant and Animal Species

Both the Federal and State Endangered Species Act protect only those species formally listed as threatened or endangered (or rare in the case of the State list). Section 15380 of the California Environmental Quality Act (CEQA), however, independently defines "endangered" species of plants or animals as those whose survival and reproduction in the wild are in immediate jeopardy and "rare" species as those who are in such low numbers that they could become endangered if their environment worsens. Appendix G of the CEQA Guidelines states that a project will normally have a significant effect on the environment if it will "Substantially affect a rare or endangered species of animal or plant or the habitat of the species." The significance of impacts to a species under CEQA, therefore, may be based on analyzing actual rarity and threat of extinction despite legal status or lack thereof. This is relevant to any project features (especially the widening of Sand Hill Road Bridge) that could significantly impact a species meeting the CEQA definitions of rare or endangered, including any of the species listed in Table 4.7-1 (see page 4.7-8).

Fish and Game Code - Sections 1601-1603

The California Department of Fish and Game (CDFG) has direct jurisdiction under Fish and Game Code Sections 1601 - 1603 over any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any stream. These regulations require that private landowners (Section 1601) or public agencies (Section 1603) obtain a "Streambed Alteration Agreement" from the CDFG prior to any alteration of a stream channel or its banks. This will be required for the proposed widening of Sand Hill Road Bridge.

Fish and Game Code - Sections 3503, 3503.5, 3513

Fish and Game Code Sections 3503 states that it is "unlawful to take, possess, or needlessly destroy the nests or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto." Fish and Game Code Section 3503.5 protects all birds-of-prey (raptors) and their eggs and nests. Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the Migratory Bird Treaty Act. These regulations could require that elements of the proposed project (in particular tree removals) be reduced or eliminated during critical phases of the nesting cycle (March 1 - August 15 annually), unless it can be demonstrated that nests will not be disturbed, and subject to approval by the Department of Fish and Game. Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered "taking." Such taking would also violate federal law protecting migratory birds (Migratory Bird Treaty Act).

Local Regulations

Santa Clara Valley Water District

Areas under the jurisdiction of the Santa Clara Valley Water District (Ordinance 83-2, Section 2.4) include the designated floodway (San Francisquito Creek) and the "banks of a watercourse" defined as (Ordinance 83-2, Section 2.1) "the sides of a watercourse, the top of which shall be

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the topographic line roughly parallel to stream center line where the side slopes intersect the plane of ground traversed by the watercourse" The District controls stormwater and all manner of drainage water, as well as any construction within their jurisdiction. Specifically, Ordinance 83-2, Section 6.2 states that "Without having first secured a permit pursuant to Section 7 hereof...it shall be unlawful...for any person, firm, corporation...the Government of California and agencies thereof, or any municipal corporation or district to do or cause to be done any of the following:

- a. Construct or place any structure or perform any grading within a designated floodway between the banks of a watercourse, or within 50 feet of the top of such banks."
- f. Plant any form of flora upon or within the banks of a watercourse or a District project.¹²

A "Section 7 permit" includes any investigations necessary to determine, "whether or not the proposed work or activities intended will impede, restrict, retard, pollute, change the direction of the flow of water, catch or collect debris carried by such water, is located where natural flow of the storm and flood waters will damage or carry any structure or any part thereof downstream, or will damage, weaken, erode, or reduce the effectiveness of the banks to withhold storm and flood waters, to resist erosion and siltation and entry of pollutants and contaminants, or interfere with maintenance responsibility or with structures placed or erected for flood control..." The permit may also require certain fees be paid.

Local Agency Tree Ordinances

The City of Menlo Park and San Mateo County have ordinances designed to preserve each community's larger, mature trees or trees with special aesthetic value. Such trees may be of a certain species, certain diameter, or may be concentrated in a certain area to maintain aesthetic features. A heritage tree ordinance is a particular type of tree preservation ordinance intended to preserve historically significant trees. Tree ordinances are summarized below.

- The City of Menlo Park, Ordinance Number 763, requires a permit for removal of a"heritage tree", defined as any tree with a trunk greater than 2 feet in diameter, measured at 4 feet above the ground.
- Two sections of the San Mateo County Ordinance Code relate to tree protection. Section 11000, San Mateo County Ordinance: Regulation of the Removal of Heritage Trees defines and protects heritage trees on private property and requires a permit to remove, destroy, or trim such trees. Section 12000, San Mateo County

Santa Clara Valley Water District, Ordinance 83-2, As amended 10/11/1985.

Richard Anderson, Santa Clara Valley Water District, telephone conversation with EIP geologist, 14 June 1995.

Ordinance: Regulation of Removal of Significant Trees defines and protects significant trees on private property and requires a permit to remove, destroy, or trim such trees.

- The City of Palo Alto does not currently have a Tree Ordinance which would protect mature and heritage trees. However, the City has expressed concern for the preservation of existing trees to the maximum extent possible, particularly large trees which are visually or culturally significant due to their species, form, or location, and trees which are in good condition and can be expected to continue to provide benefits for many years in the future. At the time of the writing of this Draft EIR, the Palo Alto City Council is considering adoption of a tree preservation and management ordinance. The draft ordinance is designed to provide protection for all coast live oak and Valley Oak trees which are greater than 11.5 inches in diameter at 4.5 feet above the ground, and any designated heritage tree (such as El Palo Alto). The ordinance would prohibit the removal of protected trees except under certain specified conditions and with the approval of the Director of Planning and Community Environment.
- Santa Clara County is in the process of developing a tree ordinance. When it is proposed that trees be removed within the right-of-way of any county-maintained road, the County requires that a map identifying trees by species and size be submitted to the County Board of Supervisors for review.

SETTING

Project Area Habitats

A habitat is a type of area where a plant or animal normally lives or grows, usually characterized either by physical features or by dominant plants, or both. Habitat types referred to in this EIR include riparian habitat, urban habitat, and grassland habitat. The quality of habitats are described as follows.

- High quality habitat includes most or all of the resource values such as complex structure, shade, water, soils, lack of disturbance, or other resource characteristics that are necessary to function as habitat for plant or wildlife species.
- Moderate quality habitat has many, but not all, of the resource values that are necessary to function as habitat for wildlife species.
- Low or marginal habitat has only a few of the resource values that are necessary to function as habitat for wildlife species.
- Suitable (or potential) habitat is defined as an area which contains most or all of the resources necessary for species use, and which is accessible, useable, and within the range of a species, whether or not the species has been observed to occur in the area.

This EIR discusses the following habitat types found on or near the project sites: Valley/Foothill Liparian habitat; Aquatic/Fisheries habitat; Urban habitat; Eucalyptus habitat, Non-native Grassland habitat, and Landscape habitat. Table 4.7-1 describes the plant and wildlife species hat have been observed in each of these habitats in the Sand Hill Road Corridor.

The following general descriptions of habitats within the area of the projects is applicable to all of the project sites and the setting for cumulative impacts within the San Francisquito Creek iparian corridor and watershed. Details on local conditions which may differ from site to site are provided below under the setting description for each project. Habitats along San Francisquito Creek are identified in a manner consistent with the Wildlife Habitats/Relationships WHR) used by CDFG and are consistent with the San Francisquito Creek Habitat Communities and Channel Types report provided by the Coyote Creek Riparian Station (CCRS). 13

Valley/Foothill Riparian Habitat

The Valley/Foothill Riparian designation used in the San Francisquito Creek Stream Inventory s equivalent to the Central coast live oak Riparian Forest¹⁴ designation used by the CNDDB. Valley/Foothill Riparian habitat is considered by the CNDDB to be a sensitive habitat which may provide habitat for sensitive wildlife species.

San Francisquito Creek is an intermittent creek tributary to San Francisco Bay. It flows in a natural, predominantly un-lined channel through flat, somewhat open land. It is one of the few creeks in the Mid-Peninsula area that contains reaches in more or less natural condition. The riparian habitat varies from 20 to 100 feet in width.

Riparian habitat, composed of tall overstory trees, medium to low height understory shrubs, and low-growing ground cover, occurs in a narrow linear corridor adjacent to perennial and seasonal rivers and creeks. In the Palo Alto area and along San Francisquito Creek, riparian overstory trees include big-leaf maple, box elder, California buckeye, white alder, Oregon ash, Northern California black walnut, Fremont cottonwood, black cottonwood, coast live oak, valley oak, arroyo willow, red willow and California bay laurel. Riparian understory shrubs include blue elderberry, toyon, Himalaya berry, California blackberry, snowberry, and poison oak. Riparian herbaceous (non-woody) ground cover includes native grasses such as blue wildrye, non-native annual grasses and non-native periwinkle and English ivy. A list of riparian trees, shrubs, and understory plants occurring in the Stanford Sand Hill Corridor Projects Area is presented in Table 4.7-1.

Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

Holland, Robert F., Vegetation Ecologist, Nongame - Heritage Program, CDFG, 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California.

Within the project area, the majority of plant species occurring in the riparian area are California native species which provide high quality cover, nesting, and foraging habitat for wildlife. Riparian habitats are valuable for wildlife because of their vegetative structural and species diversity, abundance of food resources, proximity to water, and linear cover conducive to wildlife and fish movement.

Aquatic/Fisheries Habitat

The San Francisquito Creek channel is influenced by both natural processes and human activities. The presence of artificial retaining walls results in both protection of bank from erosion and increased erosion of unprotected banks. The instream channel lacks complexity of habitat types, however riparian habitats in the area also provide structure and cover for fish residing in or using the aquatic channel habitats of San Francisquito Creek. This section of San Francisquito Creek is used as a migration corridor for steelhead, the anadromous form of rainbow trout which live in salt water, returning to freshwater creeks yearly to spawn. San Francisquito Creek is the southernmost stream in the San Francisco Bay which still supports a steelhead run. They migrate upstream in December to January (depending on winter flows) to spawn and lay eggs in Bear Gulch and Los Trancos Creeks. Juvenile steelhead prefer to remain in freshwater for at least one year prior to emigrating to the Pacific Ocean. Specific features of fisheries habitat are discussed on a site-specific basis under the Sand Hill Widening Project setting discussion.

Urban and Eucalyptus Habitat

These designations apply to the San Francisquito Creek corridor where disturbance and planting have resulted in an overstory largely composed of non-native tree species. Urban habitat is defined as areas with more than 25 percent non-native tree canopy cover. Eucalyptus habitat occurs where blue gum or other species of eucalyptus dominate the canopy. Non-native tree habitats along the creek may provide limited wildlife values, but not as much as habitats where native species dominate due to less species and structural diversity.

Non-native Grassland

In the project area, non-native grassland is dominated by annual European species of grasses and forbs (plants other than grasses which grow in fields or meadows). Common non-native grasses occurring on the project sites include slender wild oat, ripgut brome, soft chess, Bermuda grass, farmer's foxtail, Italian ryegrass, and fescue. Common forbs occurring on the project sites include summer mustard, Italian thistle, yellow star thistle, bull thistle, bindweed, wild lettuce, wild radish, and sow thistle. A list of grassland plant species occurring in the Sand Hill Corridor Projects Area is presented in Table 4.7-1.

Non-native plants are less valuable to wildlife as forage than native species. The value of non-native grassland on the project sites to wildlife as forage and cover is diminished by the practice of discing grassland in late spring for weed abatement or fire prevention. This practice kills plants, prevents formation of mature fruits or seeds, destroys burrows of small mammals, and removes protective cover for wildlife.

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Landscape Habitats

This habitat type applies to non-native trees planted outside of the San Francisquito Creek corridor. Landscaping includes a variety of exotic and native trees and shrubs selected for spring flowers, fall leaf color, growth form, compatibility with roadways and sidewalks, adaptability to the local climate, and species with a low demand for watering and maintenance. Typical non-native landscaping trees in the area of the projects include Chinese pistache, elm, ash, crabapple, ailanthus or tree-of-heaven, carob, sweet gum, and blue gum eucalyptus. coast live oaks, a native species, have also been planted extensively in the area for landscaping. A list of landscape trees and shrubs occurring in the Sand Hill Corridor Projects Area is presented in Table 4.7-1.

Landscape trees and shrubs provide a variety of cover, nesting, and foraging habitat for native and non-native tree squirrels and resident and migratory songbirds, particularly those tolerant of human activity.

Stanford West Apartments

Vegetation

The Stanford West Apartments site was used historically for agriculture and livestock grazing. Aerial photographs indicate that there was some type of soil disturbance at the site at least as recently as 1955.¹⁵ The site is currently undeveloped. Most of the site contains remnants of three habitat types: non-native grassland, landscaped areas, and valley-foothill riparian habitat.

Grassland

The open area of the site supports non-native grassland comprising annual European grasses and forbs. Plant species commonly observed in the grassland are described above under "Non-Native Grassland."

Annual grassland occurs on a contiguous area of approximately 45 acres, between Sand Hill Road and San Francisquito Creek on the Stanford West Apartments site. The area is heavily disturbed by human activities, and is cleared of brush and weeds, as well as disced annually.

In a statewide context, this relatively small area of highly disturbed grassland would not be considered biologically significant. However, the habitat value of this parcel is increased by the intensive urban land uses surrounding the project area. The parcel is the only remaining area of open grassland adjacent to San Francisquito Creek between where the Creek exits the foothills and where it enters San Francisco Bay. This grassland represents the only foraging area for redtailed hawks and American kestrel that is immediately adjacent to the riparian corridor, which provides water and nesting/roosting trees. Other grassland areas in the vicinity such as those near Stockfarm Road and Searsville Road provide raptor foraging habitat, but they are not immediately adjacent to the Creek. Certain grassland bird species such as savannah sparrows, western

Harvey, H.T. & Associates, 1994. San Francisquito Creek: Biotic Evaluation.

4.7 Biological Resources

bluebirds, and Brewer's blackbirds would be expected to forage in the grassland. Great horned and barn owls nesting in the riparian corridor would find more suitable foraging habitat in this open field, than in the surrounding urban habitat. California ground squirrels, while not rare, are abundant on this parcel, and provide attractive prey for red-tail hawks and other raptors.

The parcel is one of the few locations where aquatic amphibians and turtles could be expected to move onto adjacent foraging and nesting habitat. The steeply incised Creek channel may currently prevent this movement, but the habitat is nonetheless important. The creek bank could become more accessible for these species either through natural erosion or slumping, or manual restoration or reconfiguration of the creek bank. If this change to the creek bank happened, western pond turtle, western toad and California newt could be expected to use the portions close to the Creek.

A drainage ditch crosses the western third of the Stanford West Apartments site. It is apparently dry most of the year, and supports no evident wetland plant species. The channel appears to be excavated in upland soils, and local hydrology indicates this drainage leads away from San Francisquito Creek. This ditch lacks hydrophytic vegetation and suitable hydrology to be considered a jurisdictional wetland. Plant species in the ditch were the same as those in surrounding annual grassland.

Valley and Foothill Riparian Habitat

The site is bordered on the north by the riparian corridor of San Francisquito Creek. In the vicinity of the project, the *Biotic Evaluation* describes overbank and instream habitat quality as "moderate." This designation reflects riparian habitat that has been somewhat diminished in value as wildlife and fishery habitat due to human disturbance and occurrence of non-native plants. The habitat enhancement potential was evaluated as low for the instream area, probably because of a lack of sufficient area for adequate restoration. The potential for habitat enhancement is identified as "moderate" for the overbank. The CCRS inventory shows valley and foothill riparian habitat covering one quarter length of the south overbank bank and one half of the length of the north overbank in this stretch of the creek. (Figure 4.7-1). Trees characteristic of valley foothill riparian habitat observed in the riparian corridor include California buckeye, coast live oak, willows, California bay laurel, and blue elderberry. About half of the south bank is identified as a "cement" channel type, and the western quarter of both banks is identified as "modified" channel type, with the rest of both banks a "natural" channel type.

Urban and Eucalyptus Landscaped Habitat

The CCRS inventory identifies about three quarters of the length of the south bank along this stretch as urban riparian habitat, defined as having more than 25 percent tree canopy cover

Harvey, H. T., 1994. San Francisquito Creek: Biotic Evaluation.

Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

composed of non-native species (Figure 4.7-1). Approximately one half of the length of the north bank is composed of urban or eucalyptus habitat. A variety of trees, some of them California native species such as coast live oak, were planted for landscaping along the southern boundary of the site. Approximately 24 trees, mostly coast live oaks, border the Sand Hill Road frontage. Approximately nine blue gum eucalyptus trees and 5 coast live oak trees planted along the Governor's Lane persist to the east of the center of the site. Some of the eucalyptus have been removed or have fallen recently due to old age and damage caused by the eucalyptus longhorn borer, a destructive beetle. Large eucalyptus and oak trees may be used as roosting or nesting habitat by raptors.

Wildlife

Wildlife associated with landscaped and non-native grassland habitats on the Stanford West Apartments site include species of native and introduced birds and mammals which are adapted to living in conditions subject to almost continuous human disturbance. These include European starlings, scrub jays, house sparrows, house finches, mourning doves, California ground squirrels, Botta's pocket gophers, and house mice. Wildlife associated with the riparian habitat include redtailed, red-shouldered and sharp-shinned hawks, and native and introduced tree squirrels.

Sensitive Species

No sensitive plant species were observed on the Stanford West Apartments site during previous surveys, and none were observed during surveys for this report. As shown in Table 4.7-2, suitable habitat for sensitive plant species known to occur in the vicinity is not present anywhere on the project site.

Sensitive bird species observed in the riparian corridor during surveys for this report included the sharp-shinned hawk, a California Species of Special Concern (Table 4.7-2). Although no nests were observed, suitable potential nesting habitat occurs in trees on the site. The highest potential for nesting raptors would be in tall trees occurring in the valley/foothill riparian habitat because it is subject to less human disturbance and provides more shelter than other habitats on the site. Observations along San Francisquito Creek upstream from this site for the CCRS Inventory indicate yellow warblers, a California Species of Special Concern, are known to occur in summer and could utilize the riparian corridor in the project area for breeding.²⁰

The northwestern pond turtle, a former Catagory 3 species which may be reevaluated for possible inclusion as a candidate for federal listing, and the California red-legged frog, federally listed as threatened and a California Species of Special Concern, also occur in the general project

Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

Brian, Kangas, Foulk, aerial photograph, dated 1993.

Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

vicinity.²¹ Red-legged frogs are known to occur one mile upstream from the Sand Hill Road Bridge. Northwestern pond turtles are known to occur downstream from the bridge near the Oak Creek Apartments. Red-legged frogs could occur in the project area due to the occurrence of suitable habitat. These species are discussed in more detail below under the bridge widening discussion and in Table 4.7-2.

Stanford West Senior Housing

Vegetation

Most of this site has been previously developed and consists of structures, sidewalks, and driveways. The remainder of the site supports three habitat types: non-native grassland, landscaped areas, and valley/foothill riparian habitat. As previously described for the apartment site, the grassland and landscaped areas have been previously disturbed and are of limited value to wildlife.

Non-native Grassland

Non-native grassland occurs in the undeveloped eastern portion of the site. Grasses observed include slender wild oat, ripgut brome, Italian ryegrass, Bermuda grass, foxtail barley, and soft chess. Common forbs include summer mustard, bindweed, yellow star thistle, milk thistle, and Italian thistle.

Landscaped Areas

Scattered landscape trees form a small grove in the grassland in the eastern portion of the site. Tree-of-heaven saplings have spread from the original plantings forming small groups among the landscape trees. However, this invasive species seems to have suffered a high mortality due to drought stress. Squirrels appear to have buried seeds of black walnuts and coast live oak acorns in the area of these mature trees, but few of the resulting seedlings are expected to survive due to human disturbance for fire hazard abatement. There has been little planting of new trees elsewhere on the site. The greatest number of landscape trees occur in the developed western portion formerly occupied by the Children's Hospital. These trees, including elm, camphor, eucalyptus, and pepper were surveyed by an arborist in 1991 who presented an evaluation of their condition.²² Many trees were found to be extensively decayed, or infested with aphids, mildew, fungi, and fireblight. This may be a result of vehicular intrusion, refuse dumping, and inadequate tree management. Many of the trees, especially in areas close to San Francisquito Creek, are native, including coast live oak and California bay laurel. These appear to be relics of a once more extensive riparian community, and many are extremely large and provide an almost continuous canopy, although the understory vegetation has been removed for roads, buildings, and landscaping.

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Morneau, R., Arborist, 1991. Report prepared to update the 1987 tree survey of the Stanford West Children's Hospital site.

Valley/Foothill Riparian Habitat

Riparian vegetation is similar to that described for the adjacent proposed Stanford West Apartments site (Figure 4.7-1). In addition to the trees mentioned previously, northern California black walnut was observed. The Biotic Evaluation rates overbank wildlife habitat quality as "low" where asphalt has been placed, and "moderate" where there is no asphalt but a mix of native and non-native species occur.

Urban Habitat

Urban habitat, defined as greater than 25 percent cover by non-native tree species, occurs in a small portion of the riparian corridor located west of Arboretum Road (Figure 4.7-1).²³ Non-native species including tree-of-heaven, black locust, and eucalyptus were observed in this area.

On this site, some existing buildings, roadways, and other paved areas with setbacks of less than 50 feet from the Creek are presently located within the riparian corridor.

Wildlife

The Stanford West Senior Housing site has been completely developed for a hospital complex and has been landscaped with ornamental trees and shrubs, but it retains some wildlife values due to proximity with the riparian habitat along San Francisquito Creek, the occurrence of many native trees and an almost continuous tree canopy. Wildlife species associated with these landscaped areas would be the same species adapted to human disturbance as described above for the Stanford West Apartment site. Wildlife species associated with the riparian habitat would be the same as those described above for the Stanford West Apartments site.

Sensitive Species

No sensitive plant species were observed on the Senior Housing site during previous surveys, and none are expected due to the lack of suitable habitat (Table 4.7-2).

Although no sensitive animal species have been observed on the Senior Housing site, suitable nesting habitat does occur for raptors (such as the sharp-shinned hawk) in larger trees on the site. The highest potential for nesting raptors occurs in the valley/foothill riparian habitat, because of greater tree density and less human disturbance. While it is possible that raptors could nest in the large trees on the existing Children's Hospital site, this area is subject to more human use and less tree cover exists compared to the adjacent riparian habitat; therefore, it would be less preferred for nesting. Although yellow warblers were not observed on the site, they have been sighted upstream²⁴ and the riparian corridor provides suitable summer breeding habitat for this

Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

Coyote Creek Riparian Station 1995. San Francisquito Creek Stream Inventory.

species. It is not likely that they would use the developed portions of the site for breeding habitat because yellow warblers require dense woody cover, such as willow thickets, for nesting. Dense woody cover is lacking on the developed portions of the site.

Riparian habitats on the Senior Housing site also provide suitable habitat for the northwestern pond turtle and the California red-legged frog, although they have not been observed on the site. Red-legged frogs are known to occur about one mile upstream from the Sand Hill Road Bridge, and northwestern pond turtles occur near the Oak Creek Apartments. Although riparian habitats on the Senior Housing site are suitable for these species, there is no suitable upland habitat on the site because of existing development.

Stanford Shopping Center Expansion

The expansion of the Stanford Shopping Center would occur within the existing Stanford Shopping Center area, which is completely developed with paved parking areas and includes Arboretum Road.

Vegetation

Most landscape trees are non-native species, including Chinese pistache, carob, ash, and Brazilian pepper. Many saplings of coast live oak have also been planted in landscaped portions of the shopping center. A mature California native coast live oak has been incorporated into the landscaping on the west side of Arboretum Road.

Wildlife

The site provides little habitat for wildlife. Landscape trees may be used as perches, and foraging and nesting sites by birds, including European starlings, scrub jays, house sparrows, Brewer's blackbird, and house finches.

Sensitive Species

No sensitive plant or animal species were observed on the Shopping Center Expansion site during surveys for this EIR, or previous surveys, and none would be expected to occur due to the developed and highly disturbed nature of the site.

Sand Hill Road Extension

Vegetation

The proposed extension of Sand Hill Road would primarily occur in an existing Stanford Shopping Center parking lot. However, the road would extend up to 40 feet closer to the creek than existing pavement as it approaches El Camino Real. Much of the vegetation occurring in this area are scattered landscape trees such as elm, ash, pistache and carob trees planted in tree wells. A number of trees currently exist in the open space immediately north of the existing

parking lot near El Camino Real. The trees in this area include a number of coast live oaks ranging in size from one to eight inches in diameter), black walnut (ranging in size from 18 to 23 inches in diameter), and eucalyptus (up to 72 inches in diameter).

Wildlife

The wildlife associated with this area are predominantly urban species such as house finch, scrub jay, Brewer's blackbird and European starling.

Sensitive Species

No sensitive plant or animal species were observed in the Sand Hill Road Extension area during surveys for this EIR, or previous surveys, and none would be expected to occur due to the developed and highly disturbed nature of the site.

Sand Hill Road Widening

Vegetation

The proposed widening of Sand Hill Road between Santa Cruz Avenue and the San Francisquito Bridge and between the bridge and Arboretum Road is an urban roadside habitat with streets and sidewalks of asphalt and concrete. Street trees planted in this area total 42 individuals, including the 24 trees already described in the Stanford West description. These trees include non-native eucalyptus and tree-of-heaven as well as native coast live oak.

Wildlife

Due to surrounding dense urbanization, the road widening site provides habitat only for wildlife adapted to urban land uses and human intrusion, as described previously, although several of the trees are native coast live oaks and could provide some nesting habitat for native birds.

Sensitive Species

No sensitive plant or animal species were observed in this site during surveys for this EIR, or previous surveys, and none would be expected to occur due to the developed and highly disturbed nature of the site.

Sand Hill Road Bridge Widening

Vegetation

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Well-developed riparian vegetation, consisting primarily of mature native trees including white alder, Oregon ash, red willow, box elder, blue elderberry, coast live oak, and California bay laurel, occurs in San Francisquito Creek at the Sand Hill Road Bridge. Native riparian shrubs, including poison oak, snowberry, toyon, and California rose, are present as isolated individuals or small groupings in the understory along with non-native Himalaya blackberry. An extremely

4.7 Biological Resources

large blue elderberry tree that is more than 40 feet tall occurs on the top of the bank near the bridge widening site. The tree has a trunk with a diameter of 50-inches at the base, four major stems with a diameter at breast height totaling more than 70 inches and a canopy width of 60 feet. Increased human disturbance, stream bank erosion, and a past drought have all contributed to diminish the riparian understory. Where riparian habitat has been degraded invasive exotic species, including tree-of-heaven, glossy privet, and English ivy have spread into the riparian community. European olive and cotoneaster, less invasive exotic shrubs, were also observed occasionally in the riparian corridor. Blue wildrye, a desirable native perennial bunchgrass, occurs occasionally in the understory.

The Biotic Evaluation of the reach of San Francisquito Creek adjacent to the Sand Hill Road Bridge describes instream habitat quality as moderate.²⁵ The ordinarily high values of riparian habitats to wildlife are downgraded to moderate in this reach due to high levels of human intrusion and numerous channel crossings. For similar reasons, the north bank habitat quality is "low-to-moderate". The CCRS inventory provides data from a point (SCF 23) about one-half kilometer upstream that is typical of the bridge vicinity.²⁶ The woody riparian understory is dominated by poison oak, elderberry, California blackberry, and box-elder. Tree species at this point are composed of willow, elderberry, alder, California buckeye, box-elder, coast live oak, and valley oak in descending order of coverage. Urban habitat, defined as greater than 25% cover by non-native tree species, occurs along the east bank, north of Sand Hill Road (Figure 4.7-1).²⁷

Although the riparian corridor is subject to a high level of human disturbance due to the existing bridge and the adjacent golf course, dense vegetation and steep banks discourage human entry into much of the riparian corridor and the Creek channel. The riparian corridor is valuable to wildlife because it provides safe forage and cover near water, and is a migration corridor for steelhead, birds, amphibians, reptiles, and mammals. Data gathered at 500 meter intervals by the San Francisquito Creek Stream Inventory show a high correlation between the number of native tree species and bird species diversity.²⁸ Inventory data also indicate that where the riparian buffer zone is intact, there is a reduction in the amount of pesticides, herbicides, and fertilizers in the Creek.

Wildlife

Habitats that are valuable to wildlife are provided by trees and shrubs occurring in the riparian corridor of San Francisquito Creek. The majority of the bird species recorded during surveys for this report were observed in or associated with riparian habitat, including wood duck and mallards, red-shouldered hawk, black phoebe, Bewick's wren, California towhee, spotted (rufous-

²⁵ Harvey, H.T. & Associates, 1994. San Francisquito Creek: Biotic Evaluation.

²⁶ Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

²⁷ lbid.

Ibid.

sided) towhee, and hermit thrush. Birds observed in the vicinity for the CCRS inventory include acorn rufous woodpecker, plain titmouse, Wilson's warbler, American robin, European starling, house finch, spotted (rufous-sided) towhee, scrub jay, Anna's hummingbird, California towhee, great blue heron, lesser goldfinch, mallard, white-breasted nuthatch, brown-headed cowbird, lesser goldfinch, mourning dove, orange-crowned warbler, warbling vireo, and yellow warbler.²⁹

Mammals observed during surveys for the EIR included eastern gray and fox squirrel, and raccoon. Amphibians and reptiles known to occur in the vicinity of the bridge include western pond turtle (one individual encountered by CCRS between SCF 21 and 22), slender salamander (SCF 22 to 24), western fence lizard, and unidentified frogs.³⁰ California red-legged frogs are not known to occur in the project impact area. However, pools under the bridge are suitable habitat for red-legged frogs.

Sensitive Species

No sensitive plant species were found in the Bridge widening area during previous surveys, none were observed during surveys for this report, and none would be expected to occur on the site due to unsuitable habitat conditions. Suitable habitats for listed plant species known to occur in the vicinity are not present anywhere on the project site.

Birds observed in the riparian corridor bordering San Francisquito Creek which are California Species of Special Concern include sharp-shinned hawk and yellow warbler.³¹ Several raptor species (birds of prey), which are protected during their nesting periods, have been observed and potentially nest in tall trees or riparian vegetation within the project vicinity, including northern harrier, sharp-shinned hawk, red-tailed hawk, red-shouldered hawk, American kestrel, and great horned owl. Although no nests have been observed, suitable nesting sites exist in tall trees and riparian vegetation within the project area. Raptors which were observed during surveys for this report included the sharp-shinned hawk, a California Species of Special Concern, and red-shouldered and red-tailed hawks. These are all fully protected under Section 3503.5 of the Fish and Game Code of California.

California red-legged frogs (federally listed as threatened and California Species of Special Concern) breed from approximately November to March, depositing their egg masses on emergent vegetation on the surface of water. Their habitat requirements include dense shrubby or emergent riparian vegetation, closely associated with deep still or slow-moving water. Well-vegetated terrestrial areas within the riparian corridor may a provide important sheltering habitat during the winter. California red-legged frogs aestivate in small mammal burrows and moist leaf litter up to 85 feet from water in dense riparian vegetation.³² They require permanent ponds for survival

²⁹ Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory.

³⁰ Ibid.

³¹ Ibid.

¹² Federal Register Vol. 59, No. 22, Wednesday, February 2, 1994. 4888-4895.

during the summer months. During the rainy season they may disperse to temporary pools in nearby upland habitat but are never far from water. Suitable aquatic habitat for the red-legged frog occurs in permanent pools in the creek channel adjacent to the Sand Hill Road Bridge although they have not been documented as occurring in that specific site. It can be assumed that they occur there at some time, however, because red-legged frogs are mobile and are known to occur along San Francisquito Creek upstream from Alpine Road approximately one mile from the bridge. Sites in and adjacent to the riparian corridor of San Francisquito Creek provide marginal upland riparian habitat for red-legged frogs, due primarily to steeply incised banks, extensive disturbance and lack of suitable riparian vegetation. Although suitable aquatic habitat occurs in the area, no California red-legged frog have been observed in the reach of San Francisquito Creek within the project area nor in the vicinity of Sand Hill Road.

California tiger salamander (federal candidate species and California Species of Concern) occur in oak woodland and grassland communities in the vicinity of vernal pools or other ponded water. In the summer they hide in small mammal burrows, emerging during heavy rains in late fall and early spring to migrate to ponds where they lay eggs. They will breed in vernal pools and other calm ephemerally ponded water, so long as there are no predatory fish or bullfrogs. Streams and swift currents are generally unsuitable. A population of tiger salamanders occurs in the project vicinity at Lake Lagunita and has been extensively studied by CCRS and others. This population is remote from the project area, and suitable upland habitat for this population is present adjacent to Lake Lagunita. The project site is not considered upland habitat for the salamander.³⁵ The swift water and abrupt channel topography make aquatic habitats of San Francisquito Creek unsuitable for tiger salamanders.

Northwestern pond turtle, a former Category 3 candidate species which may be reevaluated for possible inclusion as a candidate species for federal endangered listing, requires pools and basking areas for summer habitat. It retreats into upland areas during the rainy season to avoid being swept away by flooding during storm events. It also retreats to upland areas to lay eggs. It requires gradually sloping banks, friable soils, and generally a southern exposure for nesting sites. The CCRS San Francisquito Stream Inventory reports the occurrence of a pond turtle between San Francisquito Creek Stream Inventory segments 21 to 22, behind the Oak Creek Apartments, downstream of the Sand Hill Road bridge. Although pond turtles are not documented as occurring specifically at the bridge-widening site, suitable upland habitat for egg-laying occurs on the project site and the pod under the bridge could provide suitable aquatic habitat.

Coyote Creek Riparian Station, 1995. San Francisquito Creek Stream Inventory

[&]quot;Marginal" describes habitat that comprises only some, or a few of the obligate resource characteristics for use.

Margaret Roper, CDFG, telephone conversation, February 13, 1996.

³⁶ İbid.

San Francisquito Creek is the southernmost stream in San Francisco Bay that still has a steelhead run. Steelhead trout, a California "Species of Concern" currently under review by the National Marine Fisheries Service for federal endangered species status, occur in San Francisquito Creek during seasonal migrations coinciding with high flow events from December to February.

Juvenile steelhead generally require cold water with low turbidity, saturated oxygen, sandy or cobble substrates, instream debris and overhead shade for thermal and predator escape. The Creek is largely lacking in these attributes in the project reach, and is considered unsuitable for rearing juvenile steelhead.³⁷

The San Francisco forktail damselfly is a relative to the dragonfly. It was previously listed as a Category 1 candidate for federal listing³⁸ and subsequently listed as a Category 2 candidate,³⁹ and recommended in at least one technical report for threatened or endangered status.⁴⁰ The damselfly does not appear on more recent special status species lists, implying that it has been dropped from Category 2 status (former Category 1 and 2 species are now referred to as "Candidate" and Species of Special Concern", respectively). However the species is one of public concern, and may qualify as "rare" under CEQA guidelines.

Forktail damselflies are associated with small seepages, shallow ponds, and sluggish streams in sunny locations of the San Francisco Bay Area. Males usually perch in sunlit areas near water or on low aquatic vegetation. Females forage and rest in nearby grasses and shrubs, and deposit eggs into aquatic plants with their ovipositors. The San Francisco forktail damselfly is known only from those areas of San Francisquito Creek closer to bay marshlands than the project area. The CNDDB lists no occurrences of the damselfly in the vicinity of the project. Habitat conditions in the creek downstream of Sand Hill Road are scoured, lacking in suitable aquatic vegetation, and intermittently dry. A ponded area immediately upstream of the Sand Hill bridge within the widening project area is too shaded by the riparian tree canopy to provide suitable habitat. It is therefore considered unlikely that the San Francisco damselfly occurs in the project area.

Margaret Roper, CDFG, personal comment, December 12, 1995.

Federal Register May 22, 1984)

Federal Register January 6, 1989

Hafernik, John E. Surveys of Potentially Threatened Bay Area Water Beetles and the San Francisco Forktail Damselfly: Final Report. U.S. Fish and Wildlife Purchase Order 10120-87-00352. June 1, 1989.

Hafernick, John E., personal communication, February 29, 1996

Hafernick, John E., personal communication, December 12, 1995

Stockfarm Road Extension

Vegetation

This proposed new road would cross what is now a open field dominated by non-native grassland vegetation that is frequently mowed or disced for fire hazard and weed abatement. Grasses observed include slender wild oat, ripgut brome, Italian ryegrass, Bermuda grass, foxtail barley, and soft chess. Common forbs include summer mustard, bindweed, yellow star thistle, milk thistle, and Italian thistle. A few, widely scattered coast live oaks occur in this area.

Wildlife

Wildlife associated with non-native grassland habitats on the Stockfarm Road site include species of native and introduced birds and mammals which are adapted to living in conditions subject to human disturbance. These include European starlings, scrub jays, house sparrows, house finches, mourning doves, California ground squirrels, Botta's pocket gophers, and house mice.

Sensitive Species

No sensitive plant or animal species were observed in this site during surveys for this EIR, or previous surveys, and none would be expected to occur due to the lack of suitable habitat and highly disturbed nature of the site.

Pasteur Drive Realignment

Vegetation

This project element is proposed in an area with vegetation similar in character to that described for Stockfarm Road, above, primarily disturbed non-native grassland.

Wildlife

Wildlife associated with non-native grassland habitats on the Pasteur Drive site include species of native and introduced birds and mammals which are adapted to living in conditions subject to human disturbance. These include European starlings, scrub jays, house sparrows, house finches, mourning doves, California ground squirrels, Botta's pocket gophers, and house mice.

Sensitive Species

No sensitive plant or animal species were observed in this site during surveys for this EIR, or previous surveys, and none would be expected to occur due to the lack of suitable habitat and the highly disturbed nature of the site.

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Quarry Road Widening

Vegetation

This project element is proposed in an urbanized area with vegetation limited to street trees, primarily sweet gum and oleander.

Wildlife

The wildlife associated with the Quarry Road widening area are predominantly urban species such as house finch, scrub jay, Brewer's blackbird and European starling.

Sensitive Species

No sensitive plant or animal species were observed in the Sand Hill Road Extension area during surveys for this EIR, or previous surveys, and none would be expected to occur due to the developed and highly disturbed nature of the site.

Palo Road Improvement

Vegetation

The extension of Palo Road would skirt the eastern edge of the Hoover Pavilion parking lot, in the adjacent oak woodland. This is a highly managed oak savannah primarily bounded by Palm Avenue, Arboretum Road, Quarry Road, and El Camino Real. Vegetation in this area is dominated by coast live oak, and eucalyptus. The understory is predominately non-native grassland which is mowed and managed for aesthetic and safety purposes. Grasses observed include slender wild oat, ripgut brome, Italian ryegrass, Bermuda grass, foxtail barley, and soft chess. Common forbs include summer mustard, bindweed, yellow star thistle, milk thistle, and Italian thistle.

Wildlife

Wildlife associated with habitats on the Palo Road improvement site include species of native and introduced birds and mammals which are adapted to living in conditions subject to human disturbance. These include European starlings, scrub jays, house sparrows, house finches, mourning doves, California ground squirrels, Botta's pocket gophers, and house mice.

Sensitive Species

No sensitive plant or animal species were observed in this site during surveys for this EIR, or previous surveys, and none would be expected to occur due to the lack of suitable habitat and the highly disturbed nature of the site.

Stanford Golf Course Modifications

Vegetation

The Stanford University Golf Course is vegetated primarily with irrigated turf grasses and scattered trees and shrubs. Many native trees, such as valley oak and coast live oak, have been retained as landscape features. One significant coast live oak occurs on the golf course near the bridge widening site that has a trunk over six feet in diameter at breast height. The area proposed for relocation of the golf course is a horse pasture dominated by non-native grasses surrounded by widely scattered coast live oaks. Understory vegetation, similar to that described above for the Stockfarm Road site, is dominated by non-native grassland vegetation that is frequently mowed or disced for fire hazard and weed abatement. Grasses observed include slender wild oat, ripgut brome, Italian ryegrass, Bermuda grass, foxtail barley, and soft chess. Common forbs include summer mustard, bindweed, yellow star thistle, milk thistle, and Italian thistle. A few, widely scattered coast live oaks occur in this area.

Wildlife

The golf course supports foraging habitat for wildlife, especially at night when animals adapted to suburban land uses, such as deer and rabbits, may browse on trees and shrubs or graze grasses. Wildlife use is limited, however, due to human presence during the day and the manicured nature of golf courses which provide for little shelter or escape cover. Pest control measures directed towards gophers and ground squirrels also limit the habitat value for foraging raptors. Wildlife associated with non-native grassland habitats on the golf course relocation site include species of native and introduced birds and mammals which are adapted to living in conditions subject to human disturbance. These include European starlings, scrub jays, house sparrows, house finches, mourning doves, California ground squirrels, Botta's pocket gophers, and house mice.

Sensitive Species

No sensitive plant or animal species were observed in this site during surveys for this EIR, or previous surveys, and none would be expected to occur due to the lack of suitable habitat and the highly disturbed nature of the existing golf course and proposed relocation site. An exception to this statement is the possibility of nesting raptors in some of the larger trees.

Applicable Environmental Plans and Policies

A variety of local plans and policies recognize community goals for biological resources. These plans and policies are summarized below. Any potential conflicts with these plans and policies are addressed under Impacts and Mitigations.

City of Palo Alto Comprehensive Plan

The Palo Alto Comprehensive Plan, Environmental Resources Element contains goals and policies that encourage the protection and enhancement of biological resources.

Conservation Policies

- Policy 2: Encourage programs to improve the quality of storm water runoff.
- Program 2: Require replanting where vegetation has been removed.
- Program 9: Reduce pesticide use and increase the use of natural predators and other biological controls.

The Palo Alto Comprehensive Plan, Open Space Element contains the following goals and policies that encourage preservation and enhancement of biological resources:

Open Space Goals

6. Protection and conservation of open spaces which area vital as wildlife habitat, and of areas of major or unique ecological significance.

Baylands Goals and Policies

- 1.0 <u>Preservation and enhancement of water areas:</u> Palo Alto acknowledges the necessity of the responsibility for the preservation and enhancement of all <u>water areas</u> Bay, marshlands, wetlands, salt ponds, sloughs, and creeks in order that they may:
- a. Preserve an irreplaceable resource (primarily natural) which forms a large scale open space.
- b. Preserve and enhance environmental air, water, visual and sound quality.
- c. Function as a moderator of the climate.
- d. Provide a living scientific and educational resource for all age groups.
- e. Enhance the fulfillment of open space, conservation and recreational needs.
- f. Allow for only those uses (public or private) which are found to be compatible with the foregoing objectives.

Menlo Park General Plan

The Land Use Element of Menlo Park's General Plan, adopted November 30 and December 1, 994 includes goals and policies that promote the preservation of open-space lands for recreation, protection of natural resources, the production of managed resources, protection of health and

safety and/or the enhancement of scenic qualities. The Menlo Park General Plan would only apply to those portions of the project that would be built within Menlo Park, primarily the improvements to Sand Hill Road west of the Creek.

Land Use Element

- I-G-8 ..."San Francisquito Creek, and other wildlife habitat and ecologically fragile areas shall be maintained and preserved to the maximum extent possible. The City shall work in cooperation with other jurisdictions to implement this policy."
- I-G-10 "Extensive landscaping should be included in public and private development, including greater landscaping in large parking areas. Where appropriate, the City shall encourage placement of a portion of the required parking in landscape reserve..."
- I-G-11 "Well-designed pedestrian facilities should be included in areas of intensive pedestrian activity."

Open Space and Conservation Element

The Open Space and Conservation Element of the General Plan, adopted June 4 and June 26, 1973, includes goals to preserve the wildlife habitat value and natural character of San Francisquito Creek, and to protect and conserve open areas rich in wildlife or of a fragile ecological nature.

- Policy 6: Protect conservation and scenic areas, historic, and cultural sites from deterioration and destruction by vandalism, private actions, or public actions.
- Policy 7: Preserve and protect water, water-related areas, wildlife and plant habitat areas to maintain and enhance their open space and conservation purposes.

Palo Alto Municipal Code

The Palo Alto Municipal Code includes the following regulation that requires the consideration of biological resources during evaluation by the City Architectural Review Board.

Section 16.48.120 Standards for review.

- (a) In addition to the goals and purposes of this chapter as set forth in Section 16.48.010, the following standards shall be used by the architectural review board in reviewing projects within its jurisdiction:
 - (11) Whether natural features are appropriately preserved and integrated with the project.

Coordinated Resource Management and Planning (CRMP)

Because San Francisquito Creek divides two counties and several cities, it is sometimes difficult to coordinate the response of various agencies to issues that arise related to the Creek. The goal of the CRMP for San Francisquito Creek is a watershed planning process which would protect, improve, and maintain natural resources. Other issues related to the San Francisquito Creek watershed include pollution prevention, flood and erosion control, land use and development, social issues, and public education. The eventual product of the CRMP process will be a watershed plan signed by all local agencies and governments and community groups affected by decisions in developing plans for the Creek.⁴³

Over 80 government agencies and community organizations have been involved in the preliminary CRMP process for San Francisquito Creek. These include the California Department of Fish and Game, U.S. Department of Agriculture Natural Resources Conservation Service (formerly Soil Conservation Service), San Francisco Bay Estuary Project, agencies of San Mateo and Santa Clara counties, the Santa Clara Valley Water District, West Bay Sanitary District, planning and police departments from Palo Alto, Menlo Park, Woodside, and Portola Valley, Stanford University, the Evergreen Resource Conservation District, and others. Community groups which have been involved in the early stages of organizing the CRMP include the Peninsula Conservation Center, Friends of San Francisquito Creek, Santa Clara Creeks Coalition, Community Creek Watch, Coyote Creek Riparian Station, Bay Area Action, Santa Clara Valley Audubon Society, and various fishermen's groups. Residents are encouraged to participate through local neighborhood associations and other community groups and to communicate their thoughts about Creek issues to elected officials and government agencies.

The approximate 40-square mile planning area for the San Francisquito Creek CRMP covers the whole watershed that drains into the Creek, both naturally and via storm drains, as well as the flood plain along the lower reaches of the stream. This includes areas that drain into Los Trancos, Bear, Alambique, Sausal, Corte Madera, and West Union Creeks, including portions of Woodside, Portola Valley, Ladera, Menlo Park, Stanford, Palo Alto, East Palo Alto, unincorporated Santa Clara County, and unincorporated San Mateo County.

Stanford University Plans

In 1983, a Vegetation Management Plan - Phase I was prepared for the Stanford University Planning Office which covers the Sand Hill Road frontage. Implementation of Phase I included establishing plantings along Sand Hill Road. An objective of Phase I was to publicize the need for, and benefits of, oak regeneration on Stanford University-owned lands.

Introduction to Coordinated Resource Management and Planning (CRMP) for San Francisquito Creek, undated publication. Peninsula Conservation Center Foundation.

IMPACTS AND MITIGATION MEASURES

Standards of Significance

For the purpose of this EIR, impacts to biological resources are considered significant if implementation of the project at any of the sites would:

- substantially reduce the habitat of a fish or wildlife species (CEQA Section 15065);
- cause a fish or wildlife population to drop below self-sustaining levels (CEQA Section 15065);
- threaten to eliminate a plant or animal community (CEQA Section 15065);
- reduce the number or restrict the range of a rare or endangered plant or animal (CEQA Section 15065);
- substantially affect a rare or endangered species of animal or plant or the habitat of the species (CEQA Guidelines, Appendix G);
- interfere substantially with the movement of any resident or migratory fish or wildlife species (CEQA Guidelines, Appendix G);
- conflict with the adopted environmental plans and policies of the community where it is located;
- damage or reduce the size of an existing environmentally sensitive habitat area;
- result in contamination of an environmentally sensitive habitat area which has the potential to adversely affect health or reproduction of native plants or wildlife in the habitat area;
- eliminate mature native oak trees or specimen quality examples of other tree species or substantially reduce the number of smaller trees within a given area, or
- significantly reduce nesting or roosting habitat for birds within the project area.

Methods

Using the baseline information and survey results described in the setting section, sensitive biological resources were identified, located, and mapped. Project descriptions and designs were used to literally or figuratively overlay project impacts over the occurrence pattern of sensitive resources to identify impacts considered significant under the criteria shown above. Direct impacts to vegetation and associated wildlife habitats were quantified by measuring the extent of mapped habitats (Figure 4.7-1) which were overlapped by project structures and areas of effect to determine losses. Indirect impacts were estimated based on the proximity of proposed land uses to sensitive habitats using experience and observations with similar projects, professional judgement, and established precedents from CEQA analyses for similar projects in the region.

Project-Specific Impacts and Mitigation Measures

4.7-1 Implementation of the proposed projects would result in loss of trees and associated wildlife habitat.

Implementation of all of the Proposed Projects would, together, result in the removal of up to approximately 1,198 trees, including approximately 76 trees that would qualify for protection under either the City of Palo Alto's proposed tree preservation ordinance or the City of Menlo Park's existing heritage tree ordinance (as appropriate). It should be noted that the assessment of tree loss presented herein assumes that all trees inside of or within 10 feet of a project site or road would be removed. Careful design and/or construction techniques could reduce the number of trees to be removed.

Stanford West Apartments

A total of 14 would be removed as part of the Stanford West Apartments project, including nine eucalyptus, two coast live oaks, one English Walnut, one Black Walnut and one common plum tree. Seven eucalyptus trees, comprising Governor's Lane near the east end of the site, would be removed and replaced with sycamore trees for project implementation at the Stanford West Apartments site. These trees are very large and have value as nesting habitat, although somewhat less value than a native species in a natural area due to a high degree of urbanization, nearly continuous human presence, and regular tree trimming and care. Under the significance criteria described previously, removal of these trees is considered a *significant impact*.

Stanford West Senior Housing

Approximately 181 trees, including 69 coast live oaks, would be removed for implementation on the Stanford West Senior Housing site. Among the 69 coast live oak trees to be removed, approximately 28 would appear to qualify for protection under the City's proposed tree protection ordinance. Among trees to be retained under project designs are some large oaks, and an exceptionally large California bay laurel. The unavoidable loss of 181 trees would be considered a significant impact.

Stanford Shopping Center Expansion

Approximately 585 non-native landscape trees would be removed for implementation of the Stanford Shopping Center Expansion project. The trees would be removed to accommodate new structures (retail and parking) and to accommodate a comprehensive redesign of the Stanford Shopping Center parking lot. These trees are located in the Stanford Shopping Center parking and circulation areas and are subject to nearly continuous human presence and disturbance by vehicles, and therefore have relatively little value as wildlife habitat. Nevertheless, loss of such a large number of trees would be considered a *significant impact*.

Sand Hill Road Extension and Related Roadway Improvements

A total of 54 trees, including 20 coast live oaks would be removed for construction of Sand Hill Road between Oak Avenue and Santa Cruz Avenue. This would include two coast live oaks and one valley oak that would qualify as heritage trees under the City of Menlo Park's heritage tree ordinance.

The extension of Sand Hill Road would result in the loss of 102 trees between Arboretum Road and El Camino Real, including four trees that would qualify for protection under the City's proposed tree preservation ordinance. In the immediate vicinity of El Camino Real, the proposed road extension would reach as much as 40 feet into the adjacent open space area along the creek. In this area a total of 19 trees would be removed, including 13 coast live oaks ranging in size from 1 inch in diameter (at breast height) to 8 inches in diameter, 3 black walnuts ranging in diameter from 9 to 23 inches, 2 eucalyptus (including one with a diameter of 72 inches), and 1 pine tree (8 inches in diameter).

Between Arboretum Road and the Sand Hill Road Bridge, approximately 42 trees would be removed, including 16 coast live oaks. The loss of 198 trees is considered a significant impact.

Four large eucalyptus trees, eight willows, and one acacia would be removed from the banks of San Francisquito Creek for the Sand Hill Road Bridge widening project. These trees appear to be healthy and constitute valuable habitat as a contiguous part of the San Francisquito Creek riparian corridor. Removals of these trees is inconsistent with the City of Palo Alto Comprehensive Plan, Open Space Element General Goal 6 and Bayland Goal 1, as well as the other significance criteria discussed previously. This is therefore considered a significant impact.

The proposed improvement of Palo Road would result in the loss of approximately 81 trees adjacent to the existing Hoover Pavilion parking lot. These trees are connected to the larger oak savannah present in the Stanford Arboretum which, although highly managed, provides habitat to a wide variety of common species. Although this oak savannah represents an urban wildlife habitat within a highly urbanized portion of the mid-peninsula, the high degree of vegetative management, mowing of the understory, use of the area for occasional parking, and lack of connection to the San Francisquito Creek corridor substantially diminishes the biological value of this area. Seven of the trees would quality for preservation under the City's proposed tree preservation ordinance. The loss of 81 trees, seven of which would be protected under the City's proposed tree preservation ordinance, is considered a *significant impact*.

The proposed Quarry Road improvements would result in the loss of 101 trees, including 38 coast live oaks, 16 Monterey pines, and 14 holly oaks. Nineteen of the trees would qualify for preservation under the City's proposed tree preservation ordinance. The loss of these trees would be considered a *significant impact*.

The realignment of Pasteur Drive would remove up to four coast live oak trees. Two of the trees would qualify for preservation under the City's proposed tree preservation ordinance. This is considered a *significant impact*.

The construction of Vineyard Lane would result in the removal of up to 21 trees, including 12 coast live oaks. Six of these trees would appear to qualify for preservation under the City's proposed tree preservation ordinance. This is considered a significant impact.

One large coast live oak (approximately 20-25 inches diameter at breast height) and a few small oaks may need to be removed for the proposed relocation of Tee #4. Approximately three coast live oaks about 25 years old would be removed for relocation of Hole #3. Two small oaks would be removed for new tee boxes and fairways. These are native trees adjacent to unurbanized habitats of value to wildlife. Absent replacement or other suitable mitigation, removals could be inconsistent with City of Menlo Park Open Space Element goals to preserve wildlife habitat and the natural character of San Francisquito Creek (this determination will ultimately be made by the City of Menlo Park), as well as exceeding the significance criteria thresholds described previously. This is therefore considered a significant impact.

The projects propose to replace an existing 21-inch sewer line with a larger 24-inch line, to be located approximately 100 feet west of and parallel to El Camino Real, south of the existing shopping center. Affected vegetation in the alignment would include annual grassland, scattered oaks in a savannah setting and various landscape and ornamental trees. To avoid tree removals, the feasibility of trenchless installation using a "mole" device is being investigated. If this is determined to be feasible and is implemented without tree loss, there would be *no impact*. If trenchless installation is not implemented, removal of native oak trees necessary to place this sewer line would be considered a *significant impact*.

Mitigation Measures

Replanting of all trees removed for the projects in the City of Palo Alto is necessary to comply with the Environmental Resources Element Policy 2, Program 2. Removal of the large oak tree near Tee #4 could be subject to permitting under the City of Menlo Park's heritage tree ordinance. Stanford University project plans indicate that landscape designs will be implemented to replace all trees removed, but specific details are lacking. Incorporation of the following mitigation measures into those designs and their implementation would reduce the above impacts to less-than-significant levels in the intermediate term (10-20 years) by ensuring that significant trees and their associated wildlife values are replaced through replanting. Nevertheless, short-term impacts would remain significant and unavoidable.

4.7-1(a)
(All Projects)

Native trees removed for the projects shall be replaced at a ratio of 3:1 on a per acre basis by the same species from locally collected stock. The canopy coverage of the native trees to be removed should be estimated, then an area three times larger shall be planted with container stock at standard planting densities for that species (about 15-foot on center for oaks and large native trees, about 8-foot centers for small trees such as willows or buckeyes). The survival rate for these trees after five years shall be 80 percent. If at the end of three years, the survival rate is less than 80 percent, replanting shall be conducted to attain that rate and CDFG shall be consulted to determine other corrective actions. If

4.7 Biological Resources

irrigation systems are used, all replacement native tree species grown in natural areas that are intended to be self-sustaining shall be "weaned" of any supplemental water by the fourth year. 44

4.7-1(b)
(All Projects)

For each project site, non-native landscape trees removed for the projects shall be replaced on a two-to-one basis.

4.7-1(c)
(All Projects)

The City of Palo Alto shall contract with an independent arborist to:

- a) Review the plans submitted for Final Architectural Review Board approval and for issuance of building permits. The arborist shall make recommendations regarding the site plans, including but not limited to: (1) minor modifications which could result in retention of significant trees; and (2) any necessary additional tree protection measures not specifically included in mitigation 4.7-1(e) for all trees to be retained;
- b) Provide on-site review and monitoring for the duration of the project construction to ensure that tree protection measures are implemented correctly; and
- c) Provide on-site review and monitoring of tree removal to ensure that only those trees are removed which are absolutely necessary for project construction. The arborist shall review and make recommendations to the Planning Department regarding proposed changes to the tree removal plan (related to additional tree removals) during the project construction period.

4.7-1(d) (SHR)

The loss of the large coast live oak that would be removed for relocation of Tee # 4 shall be mitigated as determined through the permit process required for removal of "heritage" trees by the City of Menlo Park. The mitigation guidelines for native trees (4.7-1[a]) shall serve as the minimum standard for mitigation. According to City ordinance, exact mitigation measures must be determined through the heritage tree permit process with the City of Menlo Park Arborist. This could include replacement with 24-inch box trees. 45

Margaret Roper, CDFG, personal communication, February 13, 1996

Jerry Hornibrook, Menlo Park arborist, personal communication, February 15, 1996

4.7-1(e)
(All Projects)

All trees adjacent to proposed project construction areas which are not removed will be avoided and protected according to the following procedures, which shall be included in all construction and/or demolition contracts:

- Before other phases of the construction project begin, a continuous protective fence (six-foot high chain link, mounted on two-inch diameter galvanized iron posts, driven into the ground to a depth of at least two feet at no more than ten-foot spacing) must be installed surrounding the bases of trees to be saved. For the ideal configuration, locate the fence to maximize the exclusion of traffic over the root zones, preferably at the drip lines. Realistically, where the building envelopes extend under a tree's canopy, define as much of that root zone as possible; modification of the fence line to the building eaveline is allowable. 16
- To preserve the important absorbing roots of trees to remain after construction, no cuts or fills should be allowed beneath their canopies. The method for site preparation of scraping the surface soil with a blade should not be allowed within the drip lines.
- Roots which must be severed and measure over one and one-half inches (1.5") in diameter should be cut cleanly and smoothly without crushing, shattering, or tearing. If roughly cut by heavy equipment, re-cut to sound wood. Cuts should be made only to lateral roots where possible.
- Equipment operators should be informed that machinery can cause great injury to standing trees. They must take special care to operate with as much distance as possible between machines and trees -- branches, trunks, and roots. Any accidental damage should be promptly repaired by a qualified arborist.
- Avoid grade changes such as can occur when soil or other construction materials are stored or stock-piled beneath any tree's canopy and thus over its root zone.

The measures for protecting trees during construction are from: Morneau, Ray. Arborist's Report for Stanford West Phase II, November 21, 1994, and City of Palo Alto "Standard Conditions of Project Approved".

- Avoid extra stress for tree roots to remain by limiting machine and vehicle traffic and parking over roots. Where frequent traffic must pass beneath a canopy, consider placement of a buffer to absorb and dissipate the load and reduce soil compaction in the root zones; wood chips or crushed rock could be used for this purpose.
- No storage, pouring, or leaking of any fuel, oil or chemical is to be allowed beneath a tree's canopy.
- No signs, wires or other construction apparatus should be attached to any tree.
- Any necessary trimming should be done to published standards under the supervision of a qualified arborist, either a Certified Arborist (Western Chapter, International Society of Arboriculture), a member of the California Arborists' Association, or a member of the American Society of Consulting Arborists.

4.7-1(f) (SHR)

The large elderberry tree near existing Tee # 4 shall be preserved, fenced and protected from construction impacts by following the recommendations in Mitigation Measure 4.7-1(d). These measures shall be accomplished as part of comprehensive riparian and oak woodland mitigation and monitoring program as specified under Mitigation Measure 4.7-3.

4.7-1(g) (SHR)

Native trees removed from natural riparian habitats shall be replaced within open space areas adjacent to San Francisquito Creek in portions of the abandoned golf course and temporary bridge construction disturbance areas, and/or adjacent to the Stanford West Apartments and Senior Housing sites. Trees will be replaced according to requirements in Mitigation Measure 4.7-1(a).

4.7-2 Construction of the proposed projects would result in tree removals that could directly destroy nests, eggs and immature birds, and would remove future nesting habitat for birds, including sensitive species such as raptors and migrating songbirds.

Stanford West Apartments

Construction of the Stanford West Apartments would result in the removal of several large eucalyptus trees, as discussed under Impact 4.7-1. These trees are suitable for nesting by raptors and other sensitive birds. This would be considered a *significant impact*.

Stanford West Senior Housing

Construction of the Stanford West Senior Housing project would result in the removal of many trees on the project site, some of which are suitable for nesting riparian songbirds and raptors. This is considered a significant impact.

Stanford Shopping Center Expansion

Construction of the Stanford Shopping Center would not result in removal of any large trees suitable as nesting habitat for riparian songbirds or raptors. The proposed project would not affect the riparian zone north of the existing Shopping Center; however, extension of Sand Hill Road along the north side of the Shopping Center would have such effects, as discussed below. This is considered *no impact*.

Sand Hill Road Extension and Related Roadway Improvements

The only portions of the roadway projects that could directly or indirectly impact riparian trees would be the widening of the Sand Hill Road bridge, the associated Golf Course Redesign/Relocation project, and the Sand Hill Road Extension. The Stockfarm Road Extension, Pasteur Drive Realignment, Quarry Road Widening, and Palo Road improvement, would not remove any large trees suitable for nesting by raptors or any riparian trees. The Sand Hill Road widening would remove some large trees, including oaks suitable as nesting habitat for raptors. This is considered a significant impact.

Riparian habitat bordering San Francisquito Creek provides suitable nesting habitat for sensitive bird species such as raptors and yellow warbler. Tree removals during the nesting season could destroy nests of sensitive bird species. This is considered a *significant impact*.

Oak trees scheduled for removal at the golf course site provide suitable nesting habitat for sensitive bird species. Tree removals during the nesting season could destroy nests of sensitive bird species. This is considered a *significant impact*.

Mitigation Measures

Implementation of the following mitigation measure would reduce the above impact to *less-than-significant* levels for the Stanford West Apartments, Stanford West Senior Housing, Sand Hill Road widening, Sand Hill Road Bridge widening and Golf Course Modifications projects.

4.7-2(a) (A/SH/SHR)

To avoid the nesting season of raptors and sensitive songbirds, tree removals shall not take place between February 15 and June 30, or as determined by CDFG on a case-by-case basis.

4.7-2(b) (A/SH/SHR)

If tree removal in the same calendar year before February 15 (i.e. between January 1 and February 15) is required, a pre-construction season survey shall be conducted to identify the presence, or lack thereof, of nests of raptors. Pre-construction surveys are necessary during this period to protect possible early nesting raptors. Surveys are not warranted until immediately prior to construction because nesting may occur in different trees from year to year. Although no nests were observed during site visits for the EIR, that does not preclude possible future nesting in trees slated for removal. If no nests are identified in trees to be removed during the pre-construction survey, no further mitigation is necessary. If nests are identified, CDFG shall be contacted and appropriate protocols for nest relocation shall be implemented. If relocation of occupied, viable nests is not feasible, construction shall be delayed and the tree left undisturbed until completion of nesting activity.

4.7-2(c) (A/SH/SHR)

Implement Mitigation Measures 4.7-1(a)-(f) and 4.7-4(a)-(c). (Tree and riparian habitat replacement measures)

4.7-3 The proposed projects would result in the loss of non-native grasslands which, due to contiguousness with the San Francisquito Creek riparian corridor, provide increased habitat diversity and foraging habitat for certain wildlife species, including raptors.

Stanford West Apartments

The proposed project would result in the removal of approximately 24.9 acres of non-native grassland contiguous with San Francisquito Creek. The presence of grassland habitat adjacent to San Francisquito Creek increases the habitat value of both the riparian corridor and the grasslands. Although the grassland area is disturbed by discing and mowing, it continues to serve as foraging habitat for raptors that may nest in suitable tree habitat of the adjacent riparian corridor. The habitat value of the grassland area is not limited to raptors, however, since numerous wildlife species rely on both riparian and grassland habitat types for difference aspects of their natural habitats. Further, this is one of the last intact grassland habitats adjacent to San Francisquito Creek, between the foothills and the Bay. Unless mitigated, impacts to the grassland near the creek could reasonably be considered inconsistent with the City of Palo Alto Comprehensive Plan, Open Space Element General Goal 6 and Bayland Goal 1, as well as the other significance criteria discussed previously. The loss of this habitat is considered a significant impact.

Stanford West Senior Housing

Since the Stanford West Senior Housing is substantially urbanized, no grassland habitat would be lost due to project construction. This is considered *no impact*.

Stanford Shopping Center Expansion

Since the Stanford Shopping Center is completely urbanized, no grassland habitat would be lost due to project construction. This is considered *no impact*.

Sand Hill Road Extension and Related Roadway Improvements

The Sand Hill Road extension, Quarry Road widening, Vineyard Lane, and Sand Hill Road widening (west of San Francisquito Creek) projects would not affect grassland habitats. The widening of Sand Hill Road, between Pasteur Drive and San Francisquito Creek, would occur in grasslands adjacent to the existing road, within the road right-of-way. These grasslands are dominated by the effects of the road and vehicular traffic, and therefore provide relatively little value as wildlife habitat. Loss of roadside grasslands of this small size are considered *less-than-significant*.

Some grassland habitat would be lost due to the extension of Stockfarm Road, the realignment of Pasteur Drive, and the relocation of Holes #2 and #3 of the Stanford Golf Course. The extension of Stockfarm Road would result in the loss of approximately 0.6 acres of annual grassland; the realignment of Pasteur Drive would result in the loss of approximately 0.7 acres of annual grassland; and approximately 3.6 acres of non-native grassland would be impacted by relocation of golf course holes. The grassland to be lost in the golf course relocation has been substantially disturbed over many years due to its use as a horse pasture and riding area. The grassland in this area, although utilized to a limited extent by some wildlife is highly degraded as a result of soil compaction, grading and heavy grazing. Vegetation present is primarily introduced species, and heavy grazing has reduced cover to an extent that the habitat is not suitable to protect small rodents from predation. While the grassland could be restored, it is likely that the habitat values of a landscaped environment (e.g., golf course) would be similar to those of the existing habitat. Brewer's blackbirds, scrub jays, and some small rodents would continue to use this grassy area, whether vegetated in introduced annual grasses, or irrigated lawn. The net impact of this project on wildlife values of the parcel would be less-than-significant.

Mitigation Measures

Loss of open grasslands adjacent to a riparian corridor in an otherwise highly urbanized environment is considered to be a significant impact. By substantially increasing the quality of habitat of the remaining grassland, CDFG concurs that implementation of the following mitigation measures would reduce impacts, and compensate for the habitat lost, to ensure that net losses to wildlife habitat are reduced to a *less-than-significant* level.⁴⁷

4.7-3(a)

(A)

Grassland habitat shall be preserved within the area between San Francisquito Creek and the Stanford West Apartments. This area shall be enhanced by protection from discing, and by replanting with native grasses

Margaret Roper, CDFG, personal communication, February 13, 1996

4.7 Biological Resources

and wildflowers and monitored for at least five years to ensure success. Native revegetation can increase general habitat values and the carrying capacity for wildlife using this area. The cessation of discing can increase the burrowing rodent population for foraging raptors. Consultation with the Department of Fish and Game indicates that they concur that enhancement of the remaining grassland can mitigate this impact to less than significant levels. The adjacent riparian habitat shall be enhanced as discussed under Mitigation Measure 4.7-3(b).

4.7-3(b)

(A)

Remaining grassland habitat shall be enhanced by seeding with a mix of California native grasses and forbs, and/or planting of plugs of native grasses. Seeding/plugging shall be performed by October 30th or before the first significant winter rainfall in the year of grassland removal.

4.7-3(c)

(A)

All replacement grassland shall be planted on-site.

4.7-3(d)

(A)

All replacement grassland shall be monitored for a minimum of two years following planting to ensure at least 50 percent survival by aerial cover of all grasses and forbs. If irrigation or fertilizers are used, all replacement grasses shall be "weaned" of any supplemental water and fertilizer by the third year.

4.7-3(e)

(A)

A yearly maintenance and monitoring report shall be provided to the City that details compliance with the above planting success criteria. The report will include results of line transect surveys indicating the relative abundance and aerial cover of replanted species. Other survey methods may be substituted if approved by the City. If the success criteria are not met, the City shall require the project applicant to implement remedial actions that will result in a minimum 50 percent survival after five years of the last date of planting. The intention of the maintenance and monitoring report is that it be a brief letter summarizing if grassland removal and replacement occurred, at what locations, where grasslands were replanted and the extent of California native species aerial cover resulting from plantings.

Margaret Roper, CDFG, personal communication, February 13, 1996

4.7-3(f)

(A)

Mowing for fire control shall be performed around the perimeter of any grassland areas, leaving as much of the internal area intact as allowable to local fire authorities, and leaving the mowed area no higher than 18 inches.

4.7-3(g)

(A)

The City may require, as a condition of approval, the applicant to provide a performance bond or other financial security to replant any replacement grasslands found not be alive at the end of the required five year maintenance period. The form of the bond or other financial security shall be found acceptable to the City and the amount shall be sufficient to cover the City's cost to replant native grassland. A qualified biologist approved by the City shall, upon written request of the applicant at the end of the maintenance period, and in consultation with CDFG determine the health of the replacement grasslands and release the security, in the event that all replacement grasslands are alive.

4.7-3(h)

(A)

The applicant shall prohibit the use of the future undeveloped lands on the Stanford West Apartments site located between Sand Hill Road and San Francisquito Creek for any construction-related activities, including, but not limited to, staging, stockpiling, and/or construction vehicle access.

4.7-4 The proposed widening of the Sand Hill Road Bridge would result in loss of riparian vegetation and associated habitat values and would encroach urban development closer to the San Francisquito Creek corridor.

Sand Hill Road Extension and Related Roadway Improvements

Widening of the Sand Hill Road Bridge over San Francisquito Creek would result in direct removal of the riparian tree canopy, understory vegetation, and associated wildlife species. Approximately 0.28 acres of riparian habitat and creekside open space would be permanently lost where the bridge structure will stand. An additional 0.3 acres could be temporarily removed or substantially degraded in the construction area of influence for access and staging. Loss of sensitive riparian habitat could adversely affect a variety of riparian dependent species. Riparian habitat is limited and declining in California. Riparian habitat supports waterfowl, breeding migratory warblers, and amphibians; and provides shade for migrating steelhead. Sensitive species known to occur generally in the San Francisquito riparian corridor include breeding migrating yellow warbler, and nesting Cooper's hawks, red-tail hawks, red-shouldered hawks, American kestrel and great horned owls. Although not specifically documented as occurring precisely in the impact area, suitable habitat exists in that area for these species. Due to the mobility of those species and their occurrence in the vicinity, the presence of suitable habitat indicates their presence as possible at appropriate seasons. Absent effective mitigation, the proposed bridge-widening project would be inconsistent with the City of Palo Alto Comprehensive Plan, Open Space Element General Goal 6 (protection and conservation of vital

4.7 Biological Resources

wildlife habitat) and Bayland Goal 1 (preservation and enhancement of creeks), as well as the other significance criteria discussed previously. Similarly, absent effective mitigation, the proposed bridge widening would be inconsistent with the City of Menlo Park General Plan, Land Use Element Policy I-G-8, and Open Space and Conservation Element Policies 6 and 7. For all these reasons, this is therefore considered a significant impact.

Widening of Sand Hill Road will also cause urbanization and human disturbance to encroach approximately 40 feet closer to San Francisquito Creek than existing developments, near the proposed Sand Hill Road Extension in the Stanford Shopping Center. Approximately 0.25 acres of existing open space would be paved as part of the realigned road, and several native trees (including coast live oaks) would be removed according to project designs. The open space area that would be impacted provides a valuable buffer from urbanization for riparian habitat along San Francisquito Creek, as well as having limited habitat values of its own. The placement of Sand Hill Road to within 60 feet of the top of the San Francisquito Creek bank is inconsistent with CDFG policies for urban development of 100-foot setbacks from natural streambanks⁴⁹. A 100-foot buffer from the top of bank is a generally accepted minimum distance standard utilized broadly by planning and biological professionals. Its purpose is to limit development along disturbed riparian habitats and protect creeks from land use impacts, particularly those creeks that may still provide spawning areas for anadromous fish species. inconsistent with the City of Palo Alto Comprehensive Plan, Open Space Element and Bayland Goal 1 to only allow uses compatible with enhancing water areas, as well as the other significance criteria discussed previously. Further, movement of the road toward the Creek would encroach on land designated in the City Comprehensive Plan as Streamside Open Space (see discussion in Land Use chapter). This is therefore considered a significant impact.

Stanford West Apartments, Stanford West Senior Housing and Stanford Shopping Center Expansion

No direct losses of riparian vegetation and associated habitat values would result from implementation of the Stanford West Apartments, Stanford West Senior Housing, Stanford Shopping Center Expansion, or other elements of the Sand Hill Road Extension and Related Roadway Improvements. As such, this would result in *no impact*.

Mitigation Measures

Implementation of these mitigation measures will reduce impacts at the Bridge Widening Site to a less-than-significant level.

Margaret Roper, CDFG, telephone conversation, May 30, 1996.

1.7-4(a) (SHR)

Removal of riparian vegetation shall be confined to the minimal area necessary for construction, by implementing the following measures and those specified under 4.7-1:

- An evaluation of engineered solutions to minimize impacts to riparian habitats from bridge construction shall be prepared to the satisfaction of a creek restoration specialist under contract to the Palo Alto Department of Planning and Community Environment and the Menlo Park Planning Department. Replacement of the wing walls with crib walls or large rocks/boulders that would allow planting of native riparian shrubs and trees should be considered in this evaluation.
- Construction staging areas and access roads shall be planned to occur away from sensitive riparian habitats, to the extent practicable.
- Damage to riparian trees shall be minimized by installing temporary barrier fencing at the outer edge (ten feet outside the tree canopy) of the riparian corridor to be avoided and ten feet outside of the drip line of isolated trees during construction.
- There shall be no disturbance allowed from construction activity, storage of materials, or worker parking, within the drip lines of trees to be avoided.
- No fencing, signs, electrical lines, etc. associated with construction shall be attached to existing trees.
- The project shall avoid an unusually large blue elderberry adjacent to the Stanford University Golf Course Hole #4 (Figure 4.7-1).

The project plans indicate that the elderberry would be avoided.

Recommendations in the arborist's report to avoid damage to tree roots shall be implemented.

4.7-4(b) (SHR)

Where removal of riparian vegetation cannot be avoided, a mitigation plan for replacement of riparian trees, understory shrubs, and habitat values caused by construction of the new bridge shall be developed in consultation with CDFG (as part of the 1603 Streambed Alteration Agreement process) and the City of Palo Alto. As part of its consideration of the mitigation plan, the City shall receive comment from CCRS and CRMP as to the adequacy and completeness of the plan. Riparian restoration can be integrated with the tree replacement mitigation (4.7-1) and planned for open space or setback areas along San Francisquito Creek

onsite, such as abandoned golf course and other sites where native riparian vegetation is currently sparse or non-existent. Areas where riparian vegetation has been temporarily removed for construction at the bridge widening site shall also be replanted with native riparian species. If more area is required to fulfill the native tree and riparian habitat replacement mitigation requirement, it can be accomplished in vacant areas left after removal of non-native vegetation. Candidate non-native tree removal and native riparian tree planting sites include those areas mapped as "urban" or "eucalyptus" along San Francisquito Creek in Figure 4.7-1.

Other creek restoration measures should be developed in coordination with CDFG, CCRS, and CRMP to allow for increased structural diversity in the channel through strategic placement of logs and other natural features. The riparian mitigation effort should be coordinated with restoration of the grassland area (Mitigation Measure 4.7-3) to increase values of both habitats. A general clean-up of the creek in the project areas to remove trash and rubble and improve fish passage should be an important feature of this overall riparian mitigation strategy. Bank stabilization and erosion control efforts should focus on biotechnical treatments that incorporate native riparian restoration plantings with "soft" structural treatments.

A maintenance plan for temporary irrigation of plantings and control of non-native plant species shall be developed. This plan shall include minimum performance criteria of 80% for survivability at the end of a minimum 5-year performance monitoring schedule, and annual reports shall be provided to the City of Palo Alto and the CDFG.

Plant materials used in mitigation shall be confined to California native species propagated from seeds or cuttings collected in the riparian corridor of San Francisquito Creek.

4.7-4(c) (SHR)

Sand Hill Road, as it approaches El Camino Real, shall be realigned to more closely coincide with the bounds of the existing Stanford Shopping Center parking lot and the existing pavement of El Camino Real, relocating the northern edge of Sand Hill Road as much as 40 feet south along El Camino Real, and relocating the right turn lane from El Camino Real to Sand Hill Road approximately 15 feet east onto the existing El Camino Real pavement (refer to Section 4.2, Visual Quality, Impact and Mitigation Measure 4.2-1 for analysis of the visual quality impact of this Mitigation Measures 4.7-4(c)).

4.7-5 Construction-related noise and human activity for the proposed projects could create impacts to native wildlife species.

Stanford West Apartments

No construction is proposed within 100 feet of existing riparian habitats for development of this project. This is a sufficient buffer to prevent interference with nesting and other wildlife activities. Impacts are therefore considered *less-than-significant*.

Stanford West Senior Housing

Riparian habitat bordering San Francisquito Creek forms the northern boundary of the Stanford West Senior Housing project site. In the project area, several sensitive wildlife species occur in, and are dependent upon, riparian habitat, including yellow warbler and protected raptors and their nests. Although they have not been documented as occurring on the project site, these species are known to occur in the vicinity, and suitable nesting habitat exists on the project site. Construction of the pool/spa facility and the mechanics building for this project is proposed within 30 feet of existing riparian habitat along San Francisquito Creek. During demolition and construction, noise and activities could interfere with foraging, reproduction, and daily movements of these and other animal species which use the riparian corridor. This would conflict with Policy 4 of the Palo Alto Open Space element to "reduce the negative impacts of human activities on plant and animal life." Although construction noise is a short-term impact and wildlife in the area are already subjected to high levels of human intrusion due to the proximity of urban development, even temporary disruption of nesting activity in the adjacent riparian habitat would be considered a significant impact.

Stanford Shopping Center Expansion

The Stanford Shopping Center Expansion project is not located adjacent to San Francisquito Creek. At its closest, the proposed Shopping Center Expansion projects are located at least 200-feet south of the riparian corridor. The Shopping Center is currently an area of high volume traffic and almost continual human activity. It is unlikely that noise, traffic, and other activity associated with construction of Stanford Shopping Center Expansion project would adversely affect wildlife on the San Francisquito Creek riparian corridor. This is considered a less-than-significant impact.

Sand Hill Road Extension and Related Roadway Improvements

Other than the widening of the Sand Hill Road bridge, none of the construction activities from roadway improvements would likely affect wildlife in the Creek corridor. In most cases, roadway improvements would occur well away from the riparian corridor. In the case of the Sand Hill Road Extension project and the Sand Hill Road widening project (west of the Bridge), the future construction activity would be at least 60 feet away from the Creek and within or adjacent to existing roads or actively used parking lots. For these project components, this impact is considered *less-than-significant*.

At the Sand Hill Road Bridge, riparian habitat within and adjacent to San Francisquito Creek provides significant wildlife values. During construction, noise and activities could interfere with foraging, reproduction, and daily movements of animal species which use the riparian corridor. Temporary disruption of nesting activity would be considered a significant impact.

Mitigation Measures

Implementation of the following mitigation measure would reduce construction-related impacts to native wildlife species to a less-than-significant level.

4.7-5

(A/SH/SHR)

No construction activities within 50-feet of riparian habitats along San Francisquito Creek shall be allowed during the nesting season between February 15 and June 30 or as determined on a case-by-case basis by the CDFG.

4.7-6 During construction, runoff from the proposed projects could adversely affect aquatic life, including sensitive animal species, in San Francisquito Creek due to erosion and sedimentation from disturbed areas.

Stanford West Apartments

Because construction activities for this project would not directly affect the bed or banks of San Francisquito Creek, and runoff from the construction site would be directed into the local drainage system, there would be *no impact*.

Stanford West Senior Housing

Grading for this project would not affect the banks of San Francisquito Creek, and runoff from the construction site would be directed into the storm drainage system. There would be no impact.

Stanford West Shopping Center Expansion

Construction of this project would not affect the banks of San Francisquito Creek, and runoff from the site would be directed towards the storm drainage system. Therefore, there would be no impact.

Sand Hill Road Extension and Related Roadway Improvements

Grading and excavation activities for the Sand Hill Road Bridge Widening Project could expose soil to increased rates of erosion during project construction periods. Surface water runoff could remove particles of fill or excavated soil from the sites, or could erode soil down-gradient, if the flow were not controlled. In the Stanford Sand Hill Road Bridge area, the loss of the material by erosion would not be a significant impact in itself. However, the re-deposition of eroded material in San Francisquito Creek could increase turbidity, thereby endangering aquatic life, and

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reducing wildlife habitat. Erosion of the streambank itself could result in losses of riparian vegetation and suitable nesting habitat for sensitive species such as raptors, and yellow warblers. Losses of suitable upland habitat for California red-legged frogs could also result from streambank erosion. Sedimentation downstream resulting from erosion in the project area could smother eggs of frogs, and degrade aquatic and wetland habitats through siltation. Erosive conditions created during the grading period can persist into the post-construction period. The amount and rate of erosion varies depending on a number of factors including time of year construction activities occur, the amount and intensity of rainfall, and the amount of vegetative cover. Please refer to Section 4.9 Hydrology and Water Quality (Impact 4.9-1) for further discussion. Without adequate mitigation measures and restoration efforts, this would be inconsistent with Policy 2 of the Environmental Resources Element (to encourage programs that improve storm water runoff quality) and Bayland Goal 1 (preservation and enhancement of water areas) This would be considered a potentially significant impact.

Mitigation Measures

Implementation of the following measure would reduce impacts to less-than-significant levels.

4.7-6

(All Projects)

Implement Mitigation Measure 4.9-1(a)-(c)

4.7-7 Installation of the Sand Hill Road bridge widening project could adversely impact aquatic life, including sensitive species.

Sand Hill Road Extension and Related Roadway Improvements

The proposed bridge widening project could result in short-term impacts to aquatic life during the construction activity for widening of Sand Hill Road Bridge. Construction activities could directly kill or injure animals, potentially including sensitive species such as the northwestern pond turtle and the federally-threatened California red-legged frog. Construction activities could also interfere with breeding migrations or activities of those species and steelhead.

The bridge widening project could also result in long-term operational impacts to aquatic life, including sensitive species, by reduction or degradation of breeding habitat in the channel through vegetation removal. Reconfiguration of the creek channel from construction activities could also lead to habitat degradation if it resulted in less diversity of structural habitat features or a shallower channel with less ponding. Inappropriate recontouring of the channel could result in long term impediments to steelhead migration. Without adequate mitigation, this would be inconsistent with Bayland Goal 1 (preservation and enhancement of water areas). This is both a short-term construction impact and a long-term operational impact that is considered a significant impact.

Suitable habitat for western pond turtles and red-legged frogs is known to occur in San Francisquito Creek in the area of the bridge crossing. Because these are mobile species it is assumed that they may be present on the site. Suitable habitat does not occur in this area for the San Francisco forktail damselfly (as discussed in the setting section). There would therefore be

no impact to this species. Steelhead are known to migrate through the site to upstream spawning grounds. Implementation of appropriate mitigation measures would ensure that impacts to red legged frog, western pond turtle, steelhead and other riparian species would be avoided or minimized.

Mitigation Measures

Implementation of the following mitigation measures would reduce the impact to a less-than-significant level by (a) ensuring that disturbance to habitat of sensitive species would be avoided or minimized both during and after construction, (b) that construction would be timed to avoid disturbance of sensitive species during their breeding or migration seasons, and (c), that post-construction channel configuration does not impede passage of steelhead or reduce habitat structural suitability and diversity:

4.7-7(a) (SHR)

Prior to approval of final project designs, the project applicant shall ensure that the Sand Hill Road Bridge widening project will not create a long-term obstacle to upstream steelhead migration, subject to the approval of CDFG and the City of Palo Alto.

After construction in the riparian zone, depth and topography of the streambed and banks shall be restored as closely as possible to the original contour to ensure that fish migration and movement of other aquatic biota is not restricted. When construction is complete, the City will determine, in consultation with CDFG, if the restored topography is adequate to allow aquatic migration passage and habitat structural diversity. Feasible measures to improve passage or structural diversity (such as installation of basking logs for pond turtles) may be considered if deemed appropriate by CDFG. If topography or hydrology are not restored to allow passage or aquatic biota, the applicant shall repair the channel, or surrender fees necessary to restore the channel.

4.7-7(b) (SHR)

All in-channel construction shall occur during a period when the affected area is dry (previous to winter rains), or with appropriate cofferdams or other dewatering measures subject to the approval of CDFG. In no case will in-channel construction occur during the rainy period (approximately October 15 to May 15), such that construction would result in mortality of migrating and breeding aquatic biota, or disruption of migrating or breeding activities.

4.7-7(c) (SHR)

The construction area shall be surveyed for California red-legged frogs and northwestern pond turtles within one year prior to construction, in accordance with CDFG survey protocols (Appendix I). Surveys prior to that time would not be useful because turtles or frogs could occupy

previously surveyed areas prior to construction. If final surveys are conducted within two weeks from start of construction, no frogs or turtles are found, and CDFG and USFWS concur with the results, no further mitigation for direct impacts to turtles or frogs is required. If surveys are finished earlier than two weeks prior to construction and no turtles or frogs are found, the area should be resurveyed at a reconnaissance level within the two weeks prior to construction to ensure none of the animals have colonized the site since the last surveys. If at any time during the surveys frogs or turtles are found, surveys can cease and the following mitigation measures implemented.⁵⁰

If northwestern pond turtles and/or California red-legged frogs are located within the construction impact area for the bridge widening project during surveys, specific measures to avoid direct take of animals and minimize impacts to habitat shall be developed in consultation with CDFG and USFWS. These measures could include: (1) collection and relocation of frog adults and larvae and turtles to suitable locations upstream immediately prior to construction under USFWS and CDFG supervision, and (2) post-construction habitat enhancement of the site for turtles and frogs. Enhancement measures would include removal of non-native trees and shrubs, replacement with native woody riparian species such as willow, and provisions for physical improvements to the site for those species such as installation of basking logs for pond turtles.⁵¹

4.7-7(d) (SHR)

The project applicant shall ensure that all applicable terms of the Section 1601 Streambed Alteration Agreement with CDFG are met during construction, and that mitigation measures recommended by CDFG and the USFWS are implemented. Measures 4.7-7(b) and (c) are typical requirements.

4.7-7(e) (SHR)

Implement Mitigation Measures 4.7-5(SHR) and 4.7-6(SHR).

Margaret Roper, CDFG, telephone conversation February 29, 1996

Margaret Roper, CDFG, telephone conversation February 29, 1996

4.7-8 Ongoing operation of the proposed projects could adversely affect aquatic life, including sensitive animal species, in San Francisquito Creek, by increasing runoff and non-point source urban pollutant loads.

All Projects

Increases in runoff from urban development, such as the proposed projects, can increase erosion and sedimentation, leading to degradation of downstream habitats, such as wetlands, from siltation. All of the proposed projects would result in an increased area of pavement and other impermeable surfaces. The resulting higher volumes of runoff potentially could increase scour. downcutting, and undercutting of the San Francisquito Creek channel and banks leading to increased sedimentation. Excessive sediment can also adversely affect aquatic life by interfering with photosynthesis, respiration, growth, and reproduction. All of the projects will increase surface areas of roads and parking lots. Runoff from roads and parking lots is known to transport oils, grease, and heavy metals. Non-point loads of hydrocarbons (oil and grease) from urban runoff can be toxic to fish and other aquatic organisms. Heavy metals such as lead, zinc, cadmium, and copper are toxic to aquatic organisms, and accumulate in the food chain. The projects will also increase the area of maintained landscaping and the levels of trash in the area because of increased human use. Fertilizer placed on landscaped areas is a source of nutrients. Trash and litter also contribute nutrients and organic matter to storm water runoff. Nutrients in urban runoff can accelerate growth of algae, causing depressed dissolved oxygen levels to the detriment of fish and aquatic animals. Plant debris, street litter, animal excrement, and other organic substances in urban runoff also increase the oxygen demand, reducing availability to aquatic animals. 52 This is considered a potentially significant impact. Please refer to Section ∠.9 Hydrology and Water Quality (Impact 4.9-4) for further discussion.

Mitigation Measures

Implementation of the following mitigation measures would reduce this impact to a less-thansignificant level by ensuring that contamination of storm water runoff is avoided or reduced.

```
    1.7-8(a)
    All Projects) Implement Mitigation Measure 4.9-1(a)-(c).
    1.7-8(b)
    All Projects) Implement Mitigation Measures 4.9-4(a) and (b).
```

Storm Quality Task Force. 1993. California Storm Water Best Management Practice Handbooks

4.7-9 Operation of the proposed projects would increase human access resulting in direct impacts to sensitive animal species and disturbance and trampling damage to sensitive riparian habitat adjacent to San Francisquito Creek and to the Creek channel.

Stanford West Apartments

Although this area is currently subjected to human disturbance from adjacent developments, the proposed project would substantially increase the population immediately adjacent to the San Francisquito Creek riparian corridor, with the likely result being an increase in human activity in the area and in the vicinity of the Creek. Direct impacts to sensitive animals could occur from activities such as hunting of frogs or pond turtles, or fishing for steelhead. Deterioration of riparian habitat could result from further intrusion of paving, lighting, domestic animals, or human activity (i.e., jogging, walking, biking) into or along the riparian corridor. Provision for public access could conflict with protection of the riparian corridor and bank. Existing use of creekside trails is infrequent and informal, yet signs of bank trampling exist. Trampling occurs when people descend or climb the creek banks without use of a formal or established trail. Increased trampling would remove vegetation directly or indirectly by causing soil compaction or erosion. This would be inconsistent with the City of Palo Alto Comprehensive Plan Environmental Resources Element Bayland Goal 1 (preservation and enhancement of water areas) This is considered a significant impact.

Stanford West Senior Housing

Because this site is already developed, the adjacent riparian corridor has been subjected to human disturbance. The proposed project, however, would place private uses and structures closer to the creek than they are now. This would be inconsistent with Bayland Goal I (preservation and enhancement of water areas). By locating a building housing a swimming pool and a mechanical building for the Health Care Center within 100 feet of the top-of-bank of the Creek, the project would also conflict with CDFG policies regarding setbacks of a minimum of 100 feet from riparian areas⁵³. A 100-foot buffer from the top of bank is a generally accepted minimum distance standard utilized broadly by planning and biological professionals. Its purpose is to limit development along disturbed riparian habitats and protect creeks from land use impacts, particularly those creeks that may still provide spawning areas for anadromous fish species. Increases in human activity resulting from the proposed project would therefore be considered a significant impact.

Stanford Shopping Center Expansion

The proposed expansion of the Stanford Shopping Center would not increase access to sensitive riparian habitats along San Francisquito Creek. This is considered *no impact*.

Margaret Roper, CDFG, telephone conversation, May 30, 1996.

Sand Hill Road Extension and Related Roadway Improvements

The Sand Hill Road Extension and Related Roadway Improvements, including the Golf Course Modifications and Sand Hill Road Bridge widening, would not increase access to sensitive riparian habitats or levels of human activity substantially beyond the already high levels. It should be noted that under existing conditions the design of the Golf Course requires crossing of the Creek four times to play Holes #3 and #4. With the Golf Course Modifications as currently proposed, the design would require only two crossings of the Creek to play Hole #4. Hole #3 would be played without crossing the Creek. This change may reduce the likelihood of future disturbance of Creek habitats by players or maintenance staff at the Golf Course. This is considered a less-than-significant impact.

Mitigation Measures

Implementation of the following mitigation measures would reduce the above impact for the Stanford West Apartments and Stanford West Senior Housing projects to a *less-than-significant* level by ensuring that human disturbance to the riparian corridor and the Creek channel is minimized. Implementation of this measure is also recommended to be included in the riparian mitigation planning efforts (Mitigation Measure 4.7-3) for the bridge widening project.

4.7-9(a) (A/SH)

Existing trails providing access to the riparian habitats along San Francisquito Creek between Oak Creek Apartments on the west and El Camino Real on the east, including the existing public trail and all informal unauthorized trails, shall be obliterated by dense barrier plantings of native riparian shrubs. A new trail shall be designed for the length of the San Francisquito riparian corridor in the project area, located outside of riparian habitats and the drip lines of existing trees. The trail shall be created of cleared, naturally compacted soils and bordered by stones or other means to encourage use of the improved trail instead of creating new trails. Appropriate fencing, such as split rail, shall be installed along the creek side of this trail in consultation with CDFG, the City of Palo Alto, and the Stanford University Planning Office.

Interpretive signs and displays shall be posted along this trail to educate the public and route access away from sensitive areas. These informative signs will be posted at intervals of not less than 500' along the trail with information regarding the objectives of creek and riparian habitat protection. Such signs will be made of wood or similar natural material, and be maintained by the applicant.

View points shall be established in areas adjacent to the Creek where their siting will cause minimal damage to existing riparian vegetation by avoiding clearing of native trees and brush and trampling under driplines of native trees. Direct public access to the Creek bank and channel shall not be permitted except over existing crossings and for access to these carefully sited view points.

4.7-9(b) (SH)

The Stanford West Senior Housing project shall be redesigned such that no new development occurs within the 100-foot setback from the top of bank based on a 2:1 slope from the toe of the San Francisquito Creek channel. This will require relocation of the proposed mechanical building and the pool/spa facility.

Cumulative Impacts and Mitigation Measures

As discussed previously, the most critical biological issues are related to San Francisquito Creek and the associated corridor of riparian habitat. The cumulative analysis for impacts on biological resources is therefore based on the context of the entire riparian ecosystem along San Francisquito Creek and its tributaries. Projects that cumulatively contribute to direct effects on aquatic or riparian habitat in the San Francisquito Creek corridor are limited to bank stabilization, flood control or road crossing projects within the channel or the riparian habitat corridor.

The cumulative context for impacts to grasslands adjacent to San Francisquito Creek is provided by the potential for any projects that would remove upland habitat adjacent to the creek or its tributaries. This context is also appropriate for impacts of increased human disturbance resulting from development adjacent to the creek and its tributaries. With the exception of the project area, existing adjacent undeveloped uplands are limited to areas upstream from Junipero Serra Boulevard. The context in this case is therefore General Plan buildout of projects adjacent to the Creek in the jurisdictions of unincorporated portions of Santa Clara and San Mateo counties, and the cities of Portola Valley and Woodside. Because of existing zoning and land use restrictions, these projects are limited to low-density residential development.

Projects that cumulatively contribute to <u>indirect</u> impacts to the Creek and associated habitats and organisms are any which would increase the level of urban development, and hence indirect effects from stormwater runoff, within the watershed of San Francisquito Creek and its tributaries. This would include buildout of General Plans within the cities of Palo Alto, Menlo Park, Portola Valley, and Woodside, as well as unincorporated areas of Santa Clara and San Mateo Counties, including much of the area occupied by Stanford University.

In summary, the cumulative context for direct effects on aquatic or riparian habitat is limited to flood control or road crossing projects within the channel or riparian corridor of San Francisquito Creek and its tributaries. The context for losses of adjacent upland habitats and increased human disturbance from adjacent development is General Plan buildout adjacent to the Creek and tributaries in San Mateo and Santa Clara Counties and the cities of Portola Valley and Woodside.



Department of Toxic Substances Control

Edwin F. Lowry, Director

Berkeley, California 94710-2721

700 Heinz Avenue, Suite 200 11 1: 10

Gray Davis Governor

Winston H. Hickox Agency Secretary California Environmental Protection Agency

August 4, 2000

Ms. Sarah Jones Associate Planner Santa Clara County Planning Office 70 West Hedding Street, East Wing, 7th Floor San Jose, California 95110

Dear Ms. Jones:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Stanford University Community Plan/General Use Permit [SCH#1999112107]. As you may be aware, the California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a resource agency, DTSC is submitting comments to ensure that the environmental documentation prepared for this project to address the California Environmental Quality Act (CEQA) adequately addresses any required remediation activities which may be required to address any hazardous substances release.

- 67 -1 The DEIR contains a proposal to construct facility, student and staff housing over the next 10 years. DTSC recommends that soils samples be collected and analyzed prior to construction of residences to ensure that hazardous substances above acceptable residential levels are not present. Historic uses of the sites should be determined and
- analyses conducted based upon previous and potential chemical uses. In addition, the DEIR states that the Palo Alto Unified School District is considering construction of a new middle school on Stanford University Land. Senate Bill 162 and Assembly Bill 387, effective January 1, 2000, requires that the DTSC review/approve all proposed school property acquisitions. If a new school is to be constructed, please contact DTSC.
- 67-3 DTSC can assist your agency in overseeing characterization and cleanup activities through our Voluntary Cleanup Program. A fact sheet describing this program is
- enclosed. We are aware that projects such as this one are typically on a compressed schedule, and in an effort to use the available review time efficiently, we request that DTSC be included in any meetings where issues relevant to our statutory authority are discussed.

Ms. Sarah Jones August 4, 2000 Page 2

Please contact me at (510) 540-3843 if you have any questions or would like to schedule a meeting. Thank you in advance for your cooperation in this matter.

Sincerely,

Barbara J. Cook, P.E., Chief

Northern California - Coastal Cleanup

Operations Branch

Enclosures

cc: without enclosures

Governor's Office of Planning and Research State Clearinghouse P. O. Box 3044 Sacramento, California 95812-3044

Guenther Moskat CEQA Tracking Center Department of Toxic Substances Control P.O. Box 806 Sacramento, California 95812-0806



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Sacramento Fish and Wildlife Office 2800 Cottage Way, Room W-2605 Sacramento, California 95825-1846

IN REPLY REPER TO: 1-1-00-TA-2323

August 4, 2000

Ann Draper, Planning Director
County of Santa Clara, Environmental Resources Agency
Planning Office
(Attn: Sarah Jones)
70 W. Hedding Street, 7th Floor, East Wing
San Jose, California 95110-1705

Subject:

Stanford University General Use Permit, Santa Clara County, California

Dear Ms. Draper:

68 -1

This letter provides technical assistance from the U. S. Fish and Wildlife Service (Service) relevant to the June 23, 2000, Draft Environmental Impact Report (DEIR) for Stanford University's Draft Community Plan and proposed General Use Permit (Santa Clara County [County] file numbers 7165-07-81-99GP-99P-99EIR, SCH No. 1999112107). Due to other responsibilities, we have only reviewed very limited portions of the DEIR. Our comments here focus primarily on the biological needs of the California tiger salamander (Ambystoma californiense) (salamander) in the proposed permit area. Outside of Santa Barbara County (where the species was recently emergency-listed), the salamander is a candidate for Federal listing under the Endangered Species Act of 1973, as amended (Act).

We recommend that the County and Stanford University (Stanford) coordinate with the National Marine Fisheries Service and with the California Department of Fish and Game (CDFG) regarding protected anadromous fish and other species under their jurisdictions. We also note that the proposed plan area includes or borders lands that are used as habitat by California red-legged frogs (Rana aurora draytonii) (red-legged frogs), a federally listed threatened species. This animal is fully protected under the Act. We recommend that Stanford and the County coordinate with us pro-actively to avoid project effects on red-legged frogs and to ensure that all university and County actions comply with the Act.

Although its current candidate status does not afford the salamander Federal protection except in the Service's own activities, we advise that projects include conservation of the salamander in their planning, both to promote its chances of survival and to reduce the possibility of a work stoppage should the species be listed. Despite its candidate status and mandated attention under the California Environmental Quality Act (CEQA), the salamander continues to lose primary

habitat in Santa Clara County and elsewhere in the south San Francisco Bay Area (e.g., previous projects at Stanford University, such as the Governor's Corner housing, and Service files 1-1-94-TA-18 [Eagle Ridge/O'Connell Ranch], 1-1-96-TA-1250 [Lions Gate/Hayes Valley], 1-1-99-F-004 [Pacific Commons, Fremont], and projects in City of San Jose jurisdiction).

The Stanford population is a moderate to large population of the salamander, in an isolated and unusual location. Few other salamander populations survive at low elevations in the San Francisco Bay area, and the Stanford population is the only known occurrence of the species remaining on the San Francisco Peninsula. Comprehensive genetic work remains to be done, but the Lagunita population is a survivor in a zone of high genetic variability for the species and may prove to be genetically distinct from other populations of the salamander.

- 68-2 Stanford's development activities have increasingly encroached on the species' upland habitat around Lagunita, the salamanders' primary local breeding pond. Under most alternatives in the current permit proposal, this trend of habitat loss would continue and worsen. In our assessment, past and proposed cumulative habitat losses at Stanford pose a grave threat to the long-term viability of the Stanford salamander population.
- Stanford, the County, CDFG, and the Service signed a Management Agreement for the salamander at Stanford University on June 1, 1998, however, this agreement did not address ongoing and proposed future habitat loss of the Lagunita population. In addition, the proposed plan/permit encompasses numerous individual projects not anticipated by the Management Agreement. The proposed permit would result in extensive and highly significant upland habitat loss, and encroachment on vital movement corridors of this unusual population of the salamander. In our judgement it would be extremely difficult, perhaps infeasible in the context of present land use in the area, to mitigate the proposed impacts to a level of non-significance, nor does the proposed mitigation remotely offset the severe, permanent adverse impacts.

Below we provide assistance regarding the fundamental biological needs of the salamander at Stanford, with a few specific recommendations. Our objective is the long term survival of the Stanford salamander population. In making our recommendations we follow the accepted framework that proposed actions should first avoid, then minimize, and, lastly, mitigate, the projected impacts.

In rough order of importance, the needs of the salamander in the proposed permit area are:

Preservation of Lagunita as a salamander breeding location, including surrounding upland summer refuge area. Lagunita is a very large and high quality breeding habitat for the salamander. We commend the recent efforts of Stanford in enhancing the quality of Lagunita for salamander breeding and recruitment (such as screening out predatory fish) and recommend that these continue. We recommend that conservation of the salamander breeding population in Lagunita be an ongoing objective of the proposed plan, and that the

Lagunita "campus open space" be protected in perpetuity by a conservation easement or similar enforceable restriction.

Long term viability of the Lagunita population of the salamander will depend not only on Lagunita itself but also on adequate surrounding uplands in which salamanders seeking refuge can find burrows and holes where they escape dry summer and fall conditions. Because salamanders use stored energy and are exposed to predation and environmental risks as they migrate to and from the breeding pond, upland refuge habitat close to the breeding pond and free of obstructions and hazards is more valuable biologically. However, salamanders can and routinely do move distances in excess of a kilometer to reach refugia.

Based on these considerations, we recommend that the permitted plan be adjusted to avoid valuable upland habitat near Lagunita, including lands easily restorable to provide upland refugia. Specifically, we recommend that the existing driving range, rather than being converted to housing, should be restored in its entirety to native grassland and oak savanna and preserved in perpetuity, by a conservation easement or comparable mechanism. Ground squirrels and other burrowing rodents should be contained and controlled only to the extent appropriate to the ecosystem and to protect human health. The degree to which the existing drainage way between Lagunita and the present driving range acts as an obstacle or hazard, if any, to migrating salamanders should be evaluated and, if necessary, the drainage redesigned. This restoration effort could be considered to offset some of the negative impacts of proposed upland habitat loss in other areas, such as the stables, open space between Electioneer and Searsville Path, or habitable areas around and among the golf course holes.

Additional open space areas reasonably accessible to salamanders from Lagunita that should be removed from development planning and preserved in perpetuity are as follows: existing open areas of the Lower Knoll and vicinity, the Gerona Triangle, the Lathrop District, and existing open areas between Lagunita and these locations. All of these areas are occupied and traversed by the salamander, and are of high value to the Lagunita population because of their undeveloped character, proximity to breeding habitat and relative accessibility. The Lathrop District is somewhat less accessible to Lagunita but highly accessible to salamander ponds created by Stanford south of Junipero Serra Boulevard.

Safe passage across Junipero Serra Boulevard. In part because of the gradual loss of upland habitat around Lagunita north of Junipero Serra Boulevard, many of the salamanders breeding and emerging from Lagunita now cross this busy road and take summer refuge in the open space to the south. Mass road-kill mortality of salamanders attempting this crossing has been extensively documented. Having a safe passage past this hazard would contribute significantly to the long term viability of the Lagunita salamander population. Stanford has committed to constructing a small, experimental tunnel under

the road to investigate the effectiveness of such a measure. However, this small effort is not likely to be enough and is significantly behind schedule. Because the salamanders tend to travel in straight lines to and from the breeding pond and are reluctant to deviate from their course, a single narrow tunnel, while useful as an experiment, is likely to be used by only a few salamanders.

We recommend that a much larger and swifter effort be started immediately and completed within three years to provide safe passage for salamanders crossing Junipero Serra Boulevard. Several large, recessed channels covered by open grates at road level, with barriers to guide salamanders in and to keep them off the road surface, appear to be a good option. Such channels should be free of substantial water runoff flows that might prevent salamanders from moving in one direction or the other. The design, testing, adaptation, construction, and management of such structures, or other safe-passage efforts, could be considered to offset some of the negative impacts of the proposed plan on the salamander in other areas.

Expansion and protection of the population. Having only one significant breeding site presents considerable risk to the Stanford population of the salamander, where one or a few catastrophic environmental or human-caused events could lead to extinction of the population. Coupled with past and proposed habitat loss around the lone major breeding pond, Lagunita, this eggs-in-one-basket scenario is especially problematic.

In a reasonable first attack on this conservation problem, Stanford has attempted to create several new breeding ponds in the foothills south of Lagunita and Junipero Serra Boulevard. The steep topographic gradients of the area, however, have constrained the number, location and size of the created pools, necessitated unusually steep banks atypical of salamander ponds, and dictated that these features will periodically wash out due to energetic flood flows, requiring perpetual and relatively frequent monitoring and maintenance. We are hopeful that they may ultimately work, but we must presently acknowledge that the success of these small created ponds as salamander breeding habitat is still in doubt. They do not offset the negative impacts that have already occurred to the Stanford salamander population, or remotely compare to the biological function of Lagunita in supporting this population. We are also concerned that there is no guarantee of long-term preservation of the mitigation area.

We recommend continued efforts to mitigate Stanford's past impacts and any permitted future impacts by establishing new breeding ponds and expanding the salamander population in the surrounding area, both in distribution and numbers. Considering the significance of the impacts, temporal loss of function, and the experimental character of the mitigation, which places risk on the salamander population, mitigation areas should greatly exceed impact areas. Steep gradient lands will continue to constrain the suitability of potential mitigation sites, as well as number, placement, size, and function of created pools. We recommend that Stanford enlarge its consideration of salamander mitigation

lands so that flatter sites more suitable for salamander habitat may be found. Success criteria for salamander mitigation should be established, in coordination with CDFG and the Service. Mitigation efforts should be monitored closely and adapted if problems or more effective methods are discovered. Contingency measures should be identified for the possibility that mitigation efforts fail to meet success criteria.

We routinely require that habitat areas intended as mitigation must be protected as natural habitat in perpetuity, preferably by a permanent conservation easement in a form acceptable to the Service. Stanford has expressed difficulties with this practice, but has not proposed a viable alternative. We recommend that the County require a permanent conservation easement over any biological mitigation lands. We are enclosing a copy of our standard template of a conservation easement for your information. We recommend that the County and Stanford coordinate with us and CDFG if any alternative to permanent protection is considered, so that we may provide assistance regarding whether the alternative is adequately protective.

The university should also continue to implement all measures required under the 1998 Management Agreement.

We remain available to work with you, Stanford, and CDFG to achieve long-term conservation of the Stanford population of the salamander. If you have questions about this letter, please contact David Wright or Ken Sanchez at (916) 414-6625.

Sincerely,

Karen J. Miller

Chief, Endangered Species Division

Enclosure

cc: ARD (ES), Portland, OR

Sylvia Donati, Santa Clara County Planning Office, San Jose, CA Catherine Palter, Stanford University Planning Office, Stanford, CA Carl Wilcox, CDFG, Yountville, CA Margaret Roper, CDFG, Gilroy, CA NMFS, Santa Rosa, CA

Dear Ms. Jones:

Having attended the Planning Committee meeting last night (August 4, 2000), I wish to append some additional thoughts to the message I previously sent you (and attached to this message).

I'm concerned that members of the Planning Committee might view people like me to be uncaring, elitists with a NIMBY attitude. Nothing could be further from the truth, for myself personally, nor for my fellow Golf Course members.

I graduated from Stanford in 1965, having benefitted enormously from four years in student housing and a substantial academic scholarship. Without a car, my mode of transportation was a bicycle. I strongly believe in the value of on-campus housing for faculty, staff, and students. As young marrieds, my wife and I lived in the College Terrace for one year--what a tranquil area to get a start on life. Today, my grown children cannot afford to buy a home in the Bay Area. And the traffic in Palo Alto (even on a week night after the Planning Meeting!) is almost unbearable. I deeply empathize with the students and lower income employees who face a horrendous housing crisis and a general degradation in their quality of life.

69-1 I have talked with dozens of my fellow Golf Course members, and, without exception, all agree that we must address the housing situation. We in the Bay Area have allowed jobs and population to grow at a much greater rate than affordable housing. Stanford now has an opportunity to address its part of the problem. Stanford should cap student enrollment, defer academic construction, limit faculty hiring to replacements only, and put all its resources into adding housing for the current population. And I do believe that there is available space within the current academic boundaries for such construction without infringing further on greenbelts.

It's not a choice between open space and housing, for we need both. What we don't need now is more academic growth that puts even more pressure on our environment and housing costs.

Thanks for your consideration.

Charles Taubman 20658 Shelly Drive Cupertino, CA 95014 408-257-3251 nambuat@aol.com

[Copy of Previous Message]

Dear Ms. Jones:

I am sending you this message to document my dismay with the Stanford University Draft Environmental Impact Report and Community Plan and Use Permit Application. I am specifically upset with the University proposal to redesignate Golf Course lands from Open Space to Academic General. The current plan to build several hundred housing units on what is now the first

hole is simply unacceptable.

The Stanford Magazine published in its July/August 2000 issue a letter which I wrote, criticizing the University's unwillingness to take a stand on behalf of open space. When I wrote this letter, I did not know that Stanford was preparing a Use Permit Application that ignores hundreds of acres closer to the campus center (much of which is paved over parking lots) in favor of permanently eliminating a popular recreational resource that also serves as a wildlife habitat.

The housing crisis is real, not just at Stanford University, but throughout the Bay Area. Quality of life, however, is vital for Stanford residents and the neighboring communities. I do hope that you and your colleagues will direct Stanford towards greater intensification of its current housing so as to accommodate more people on less land, while simultaneously preserving the environmental treasures over which it has stewardship. Once the Stanford Golf Course is gone, it will be gone forever.

Sincerely,

Charles N. Taubman 20658 Shehly Drive Cupertino, CA 95014 (408) 257-3251 nambuat@aol.com Dear Sarah,
I want to send my agreement of Janet Rutherford's message concerning
Stanford land development plans and the DEIR.

As a long time Stanford community member I have been supportive of

70-1 As a long time Stanford community member I have been supportive of many of the university's changes and growth, especially when it comes to housing for students and staff. However, the cost of the proposed plans is too high a price. From what we heard last night at the Santa Clara County Planning Commission meeting, I am certain that the university's planning office could be more creative about the proposed changes, especially when there are excellent and viable alternatives.

Thank you for hearing us -- all! Sincerely, Cristen Carlson Osborne Stanford employee, daughter of a university retiree, and a Palo Alto resident >Date: Fri, 04 Aug 2000 13:16:54 -0700 >To: "Cristy C. J. Osborne" <cjosborne@Stanford.EDU> >From: Janet Rutherford <janetr@Stanford.EDU> >Subject: Leter to Sarah >To: Sarah <sarah.jones@pln.co.scl.ca.us> >Subject: Thanks for this, Sarah >Cc: >Dear Sarah. >It's wonderful to send our thoughts and feelings regarding this DEIR. >It's easier than we all imagine, Sarah, the impacts can be halved, >and better than that, Stanford can have all it wants if >They confine building to housing and refurbishing academic >buildings. They must be held to housing first, since they've not >done that for decades. We've heard testimony from faculty and grad >students who've limped along for ten years with no help after they >had been promised so much help. >We already have sport facilities (stadia) and we can replace them, >not add to them. >Parking can go up, 2nd 3rd stories. That lovely one in Palo Alto is >a wonderful model (the one between Cowper and Webster, across the >street from the Garden Court). >We just need to hold them to that and keep them held ONLY to that.

A CALL OF

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>----
>Research can be done elsewhere, off campus. Stanford research
>doesn't have to be HERE to be done for Stanford, by Stanford. If the
>researchers need to come here to present findings and lead seminars,
>they can stay at the Schwab Center and the new Westin and Stanford
>Park.
>Think of the donation possibilities! All states' alumni, donating
>land and buildings, monuments to themselves. (I've written this to
>Provost Hennesy already, in detail).
>----
>Let's have little trolleys to get here again, have people NOT NEED
>cars, they'll see that cars are a nuissance in this space. Golf
>carts are the best and they can be made available for those who
>can't walk, skate, or bike. Have small jitneys (are there golf cart
>jitneys?) on campus, smaller scale Margarites to go in and around,
>that people can jump off and on.
>We can do all that and EVERYONE will be happy, except Stanford Land
>Management, who have dollar signs in their eyes. They see only real
>estate possibilities and it galls them to let land go untouched.
>They are not the good stewards that Stanford claims. Any good
>stewards were those OTHER than the SLM folk's -now. They've slimed
>this whole deal. You and Joe Simitian and others who held yourselves
>above it, allowed a forum for comment for the community that will be
>so heavilly impacted, and gave the whole proceedings dignity.
>You also gave us someone to work with. Thank you ever so much.
>Regards,
>Janet Rutherford
>Stanford staff member
>Palo Altan
> >
```



TJConnelly@aol.c om

08/04/00 02:44 PM

To: sarah.jones@pln.CO.Santa-Clara.CA.US,

joe.simitian@bos.CO.Santa-Clara.CA.US

CC:

Subject: Save Stanford Golf Course

71-1 I am very concerned that the open space provided by the Stanford Golf Course will be slowly reduced to high density housing.

Recognizing that the University has a serious recruiting problem and a student housing problem as well, due to the high cost of housing in the area, I feel that the use of golf course land to alleviate it is short sighted.

I urge you to do all that is possible to see that this beautiful and historic open space be preserved.



Janet Rutherford <janetr@leland.St anford.EDU> To: Sarah <sarah.jones@pln.CO.Santa-Clara.CA.US>

cc:

Subject: Thanks for this, Sarah

08/04/00 12:20 PM

Dear Sarah.

It's wonderful to send our thoughts and feelings regarding this DEIR.

It's easier than we all imagine, Sarah, the impacts can be halved, and better than that, Stanford can have all it wants if

72-1 They confine building to housing and refurbishing academic buildings. They must be held to housing first, since they've not done that for decades. We've heard testimony from faculty and grad students who've limped along for ten years with no help after they had been promised so much help.

We already have sport facilities (stadia) and we can replace them, not add to them.

Parking can go up, 2nd 3rd stories. That lovely one in Palo Alto is a wonderful model (the one between Cowper and Webster, across the street from the Garden Court).

We just need to hold them to that and keep them held ONLY to that.

Research can be done elsewhere, off campus. Stanford research doesn't have to be HERE to be done for Stanford, by Stanford. If the researchers need to come here to present findings and lead seminars, they can stay at the Schwab Center and the new Westin and Stanford Park.

Think of the donation possibilities! All states' alumni, donating land and buildings, monuments to themselves. (I've written this to Provost Hennesy already, in detail).

Let's have little trolleys to get here again, have people NOT NEED cars, they'll see that cars are a nuissance in this space. Golf carts are the best and they can be made available for those who can't walk, skate, or bike. Have small jitneys (are there golf cart jitneys?) on campus, smaller scale Margarites to go in and around, that people can jump off and on.

We can do all that and EVERYONE will be happy, except Stanford Land Management, who have dollar signs in their eyes. They see only real estate possibilities and it galls them to let land go untouched.

They are not the good stewards that Stanford claims. Any good stewards were those OTHER than the SLM folks now. They've slimed this whole deal. You and Joe Simitian and others who held yourselves above it, allowed a forum for comment for the community that will be so heavily impacted, and gave the whole proceedings dignity.

You also gave us someone to work with. Thank you ever so much.

Regards,

Janet Rutherford Stanford staff member Palo Altan



Denis Coleman <denis@denis1.co</pre>

m >

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC

Subject: I Love Stanford Golf Course

08/04/00 11:21 AM

Dear Ms Jones:

I urge you to work to present the lovely open space that is the Stanford Golf course into residential housing.

73-1 Stanford has plenty of land closer to the center of campus. Stanford can increase its current and planned housing to accommodate more people on less land. We don't need more sprawl and accompanying traffic and parking problems. The University owns hundreds of acres that are closer to the center of campus, not as environmentally and aesthetically sensitive as the golf course, and are better suited to urban development than the Golf Course.

I urge you to keep the Stanford golf course in tact as it has been, a gem in this community since the 1920's.

Thank you,

Denis R. Coleman 296 Bay Road Atherton CA 94027 Date:

August 6, 2000

To:

Planning Commission, Santa Clara County

From:

Kathy Durham, 2039 Dartmouth Street, Palo Alto, California 94306

Subject:

Traffic Impacts of Stanford's proposed General Use Permit and

The Need for Mitigation

My family lives in the College Terrace neighborhood, which is surrounded on three sides by Stanford land as my neighbor Paul Lomio has shown you. I'm a Stanford alum, and so is my husband, who is a Stanford professor and bikes to work. We value all the positive contributions the university makes to this region, but we are also concerned that our neighborhood is being drastically affected by the growth of jobs on campus and in particular by the housing being built in the East Campus area.

Eleven years ago, when hearings were held on the Final EIR for Stanford's current General Use Permit, I hired a babysitter for my 6 and 2 year old boys and drove down to San Jose to speak to the County Planning Commission. My concern then was about the growing volume of speeding cars on Stanford Avenue. All College Terrace children have to cross Stanford Avenue to get to Escondido Elementary School, and parents were concerned about the increasing traffic volume, excessive speeds and unsafe conditions on this collector street which marks the southern border between Stanford's unincorporated county land and our Palo Alto neighborhood. We observed that a large portion of this traffic goes into and out of Bowdoin Street on weekdays (all day, not just peak periods), and there is a noticeable decline in volume when classes are not in session.

Unfortunately, despite the recommendation of the Palo Alto City Council, the County's Conditions of Approval in July 1989 did **not** include monitoring traffic volume, speed and noise on Stanford Avenue, let alone mitigation, because Final EIR predicted that the university's growth would only cause an "insignificant" increase in volume on our collector street.

- 14-1 If that had been the case, I would not be submitting these comments today. But, as the table on the next page shows, what actually happened is that there are now close to 10,000 cars on Stanford Avenue near El Camino Real. Instead of the predicted 600 additional cars (50% due to Stanford's GUP), we must live with 1700 additional vehicles, or almost 3 times the predicted increase in volume. Stanford Avenue is now one of the highest volume residential collector streets in the city of Palo Alto (I believe that only Churchill Avenue between Alma and El Camino carries more cars). At the other end of Stanford Avenue, near Junipero Serra Boulevard, the increase totalled 3500 cars, or nearly 6 times the predicted increase. By anyone's standards, these are significant impacts for a residential area to absorb.
- Do we know exactly how much of this increased volume is due to the university's growth under the current GUP? No, we don't, because there was no requirement to monitor what happened. But our geographic position and common sense suggest that even if the university did meet its overall "no net new trips" goal, far more than 300 additional trips were generated at each end of Stanford Avenue by the current GUP.

STANFORD AVENUE TRAFFIC VOLUMES (ADT)

	1985/86 Actual	2000 w/o GUP (predicted)	2000 w/GUP (predicted)	1999 Actual
Stanford Ave. (at El Camino)	7,900	8,200	8,515	9600 (+ 22%)
Stanford Ave.	6,000	6,300	6,615	9500 <i>(+ 58%)</i>

Source:

1985/86 actual and 2000 predicted: 1989 GUP Final EIR, p. 11-3. 1999 actual: City of Palo Alto count, 10/99 & Draft EIR, p. 4.4-30.

This makes it all the more important that the county gets it right this time as far as mitigating the significant cumulative impacts the College Terrace neighborhood has experienced and will experience due to Stanford University's growth under the current GUP and the proposed GUP for the next 10 years. Some specific suggestions:

- Give your support to 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.
- Require that monitoring of traffic volume and speeds on the roads surrounding Stanford lands, and the necessary origin/destination studies to evaluate Stanford's fair share of cut-through traffic on collector and local streets as well as arterials, be conducted independently and reviewed by non-Stanford transportation professionals familiar with current local traffic patterns.
- 74 -4 Continue to require the goal of "no net new commute trips, but also mitigate the inevitable impact of local trips from housing to be constructed under this GUP. Much of the proposed housing to be built under this GUP will be on/near Stanford Avenue. College Terrace is going to be affected by both commuter trips and the inevitable increase in local trips generated by the new campus residents. I urge you to require a comprehensive trip-reduction program for all campus residents not just commuters.
- Also, because Stanford Avenue is at the limits for a collector street, we ask that you require physical traffic calming measures to slow cars down and reduce the temptation to cut through our neighborhood that. 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.

I'm not asking that the university pay for all the traffic calming measures our neighborhood needs, but that it pay its fair share, and that it work with its neighbors to

come up with mutually workable solutions to the transportation-related consequences of such a massive building program. This was the county's intention when the Multi-Jursdictional Task Force was added to the conditions imposed on the university last time, but with no requirements for actual mitigations, eleven years have been lost.

A Cautionary Note about Parking Demand from New Student Housing

In 1987-88, when the Rains graduate housing complex was built, the university claimed that less than 600 parking spaces were needed for almost 800 single graduate students. However, once the housing was built, additional parking spaces had to be added to accommodate the actual demand. These spaces are on both sides of Bowdoin Street, and also in the Wilbur lot. Therefore, I question the notion that 1000 units may be added to the East Campus area, but that less than 600 additional parking spaces would be needed.

Thank you for considering this input as you make your recommendations concerning the Draft EIR for Stanford's Community Plan and General Use Permit Application. Thank you also for holding hearings in north Santa Clara County, even though I no longer need a babysitter.

STANFORD AVENUE TRAFFIC VOLUMES (ADT)

	1985/86 Actual	2000 w/o GUP (predicted)	2000 w/GUP (predicted)	1998/99 Actual
Stanford Ave. (at El Camino)	7,900	8,200	8,515	9600 (+ 22%)
Stanford Ave. (at Junip.Serra)	6,000	6,300	6,615	9500 (+ 58%)

Source: 1985/86 actual and 2000 predicted: 1989 GUP Final EIR (p. 11-3).

1988/89 actual: City of Palo Alto count , 10/99 & (Draft EIR, p. 4.4-30).

August 5, 2000

Linda Cohen, M.A. (53 year resident of California, 23 years in Palo Alto) 935 Scott Street
Palo Alto, Ca 94301

TO: Sarah Jones, Associate Planner
TO: Santa Clara County Planning Staff (Road and Airports)
TO: Santa Clara County Planning Commissioners
Santa Clara County Planning Office
70 West Hedding St., East Wing, 7th Floor
San Jose, Ca 95110

RE: Comment on the DEIR for Stanford Univ. GUP Dear Ms. Jones and fellow Staff:

I am asking you to further explore and study the following:

- 75-1 1) FURTHER OPTIONS WHICH SHOULD BE STUDIED TO MINIMIZE IMPACTS resulting in overwhelming congestion in our neighborhoods.
- 75-2 -2) AN ALTERNATIVE PERMANENT ACADEMIC GROWTH BOUNDARY.
 CONSISTENT WITH PALO ALTO'S URBAN GROWTH
 - 3) AN ALTERNATIVE THAT RESPECTS PALO ALTO'S URBAN GROWTH BOUNDARY.
 - 4) A STRONGER LINKAGE BETWEEN ACADEMIC DEVELOPMENT AND HOUSING BE STUDIED IN THE EIR TO ENSURE THAT THE ACADEMIC DEVELOPMENT DOES NOT OUTPACE THE HOUSING. Further, the necessity to pursue over 2 million more sq. feet in the next 10 years of academic and support facilities at all. Find ways to slow this process down and make housing a priority for the next ten years. Then assess the impact and what can be accommodated
 - 75 -4 4) A REDUCED PROJECT ALTERNATIVE TO BE STUDIED MORE THOROUGHLY.

Page 2 - Cohen. Linda Re: DEIR Stanford

And this is why:

Stanford's upcoming land use application and agenda will overwhelm the surrounding neighborhoods. The DEIR, is insufficient in determining the impact or exploring options to relieve us from the various stressors that will come from traffic,

overuse of our amenities, facilities and infrastructure. We are beyond being maxed out in terms of how much we can take on and cope with in Palo Alto. Do the numbers and look at how many people come into Palo Alto during the week. It is about the same amount as the people that live here. The weekends, after all the commuters clear out, are the only time we can feel at home in our own town. I can't imagine providing housing here for twice our population. I think we should focus on exporting jobs or hiring people who live in town first. Stanford led our city on when it pushed heavily for the Sand Hill Development Project. We are in enough shock from that and need a lot of time to adjust. Stanford indicated we would be able to continue to use the Dish for recreation and rejuvenation and that gained them support for Sand Hill and its next GUP.. Now it pulls the rug out, perhaps because many of us are insisting it keep its bargain. The trust is gone. Their community relations paid staff, PR arm and it's land management company use manipulative tactics that are below the belt. As people say," shame on them. Shame on them for exploiting the trust and goodness of the University per se. I.E.-We personally were given a voice mail rebuttal to a "letter to the editor" my husband wrote from the Community Relations office asking him not to repeat his point of view saving that he was out of line. No personal name or number was left for us to return that call to that person.

As a North Palo Alto resident, I am feeling the pain of all of the development past, present and future of Stanford and our SOFA neighborhood along with the closing of the Dish trails. At least, the Dish trails were what helped me (many of us) to stay healthy. And I enjoyed all the people encounters up there over the years sharing our wonderful feelings and happiness together as we kept ourselves mentally, physically and spiritually fit. With the new "strictly enforced rules" it won't be the same, and they say if we don't comply out we go. Can we then dismiss them from our city parks, pool, golf course, baylands, etc. because then they will be even more filled up once we can't/won't be going to the Dish and the onslaught of development in our area continues? Can we kick out all of their traffic too and require parking permits to park in

our city? And I'd gladly trade Foothill Park (as is often used against our pleas) for permanent Dish access with professional open space preserve management.

75-5 How can Stanford officials ignore these many benefits to the community? This is what baffles me. The east Dish side has gotten more beautiful over the years, in spite of the recreational use. It's more forested and the rogue trails (left over from the farm days) are not overly frequent. Just compare the west side of the dish where the cows hang out with the east side. Like night and day. There is plenty of land in addition to the new conservation zone that could continue to be used responsibly by hikers without harm. This should stay available to ease the pain of so much more upcoming congestion?

So, I wonder, in total disillusionment. What is the bottom line of everything -education, research, business, law, medical science, jobs-Stanford the University stands for as per their constitution- - what's it all for IF NOT to have something like these foothills, this space, in our lives that nourishes us on a frequent basis. These foothills are powerful medicine. True wisdom would dictate that with more and more densification of our area, we need more local open space as a place to go to, to get away from and to keep us well, not less. Is this what we get for having a "prosperous" region? Well, I truly had more "prosperity" fifteen years ago then I will soon end up with. This is what I call crazy making.

Perhaps, I am speaking from a peasant's point of view. My modest, simple life used to be enough for me. But I know there are many, many more just like me. We all feel the pain.

Thank you. I am sure you will do the right thing.



"DonKnott" <DonKnott@email. msn.com>

cc:

To: <sarah.jones@pln.CO.Santa-Clara.CA.US>

. . .

Subject: Proposed CP/GUP for Stanford University

08/05/00 09:47 AM

- Sarah. I believe it would be an absolute and disastrous mistake to eliminate portions of the existing golf course and replace with faculty housing as Stanford now proposes. The existing course has a wonderful rural feel that sets it apart form other courses in urban settings. It is considered one of the best, if not the best, university courses in the country. Essential to the course quality is the natural habitat that is part and parcel of the course. Reducing the course to a tighter envelope would certainly have a large negative impact on the character and ambiance, the qualities that make the current course great.
- Fliminating the first hole would eliminate the open space buffer surrounding the Stanford Icon, the red barn. The barn is currently surrounded by the golf course which is essential to the barn's rural feel. Housing backing up to the barn would render this icon useless. Stanford may as well relocate the barn to a location in the foothills where it would have a happy rural environment. Faculty housing as a neighbor would not make the barn happy.
- I note on figure 7-5 (County Trails) that the Connector trail from county trails master plan traverses directly through several holes of the existing golf course. Keep in mind that the plans should in this DEIR are only the Santa Clara Co. land. The golf course is also located within San Mateo county and plays on both sides of San Francisquito creek. The trail should in figure 7-5 would bisect holes 4,8,12,and 14. It would be unacceptably close to holes 15, 13, 9, and 7. Any public trail in the area of the existing course should be routed around the perimeter of the course (even this may be difficult) and should certainly not be shown traveling through the middle of the course.

Regards, Don Knott Golf Course Architect, ASGCA



Katz Family <ratz@pacbell.net</pre>

To: Stanford Hills <sarah.jones@pln.CO.Santa-Clara.CA.US>

cc:

Subject: Open Space and the Dish

08/05/00 08:31 PM Please respond to ratz

Dear Ms Jones:

I am not a dot.com millioneer or golfer. I drive a Geo and not a SUV. I'm a long time Palo Altan (20+ years) who enjoys hiking from Stanford Ave and looping past the dish.

77-1 Its available hiking without driving to Woodside or farther.

Please don't allow Stanford to take this away from us. In all my hiking I've never seen anyone litter and only twice have I seen dogs off trail.

Thannks for your attention.

PEnny Katz 3407 South Ct Palo Alto CA



"SANDY B FORREST" <NANASFORREST

To: <sarah.jones@pln.CO.Santa-Clara.CA.US>

CC:

@ISPCHANNEL.CO

Subject: SAVE THE DISH

M >

08/05/00 09:43 AM

78-1 DEAR SARAH JONES, I BEG YOU TO PREVENT BUILDING ON THE DISH. I HAVE LIVED ON THE CAMPUS FOR 12 YEARS AND IN COLLEGE TERRACE FOR 22 YEARS. THE DISH IS MY OASIS FROM ALL THE CONGESTION, AND TRAFFIC IN PALO ALTO. THANK YOU FOR YOUR EFFORT. SANDY FORREST

57371VED 5107 21 200 - 7 1710: August 6, 2000

Sarah Jones Santa Clara County Planning Dept. 70 West Hedding St., 7th Floor San Jose, CA 95110

Subject: SCC Failure to Address Stanford Wildlife Refuge in Environmental Documents

Dear Ms. Jones:

In the late 1980's, I submitted comments to SCC concerning the legislative designation of the Stanford property as a state game refuge. These comments were submitted first the Palo Alto City Council during the EIR review of the proposed Reagan Library in 1986. I later submitted comments in response to EIR discussion of the refuge in the 1989 GUP EIR. I also submitted comments on the refuge to San Mateo County during the CEQA review for the 1988 SMC Stanford Area Plan.

The Reagan application was subsequently withdrawn, however, the DFG responded to the refuge issue in both oral and written comments on the project. The SMC EIR background report discussed the need to cover the refuge in the EIR, but that project was subsequently shelved indefinitely. The 1989 SCC GUP EIR was the first, and so far as I can tell, the only environmental document to address the issue.

The refuge discussion in the 1989 EIR was woefully inadequate. Rather than address impacts of the proposed project to the refuge area as called for in DFG comments during the Reagan project, Stanford used the EIR as a vehicle to debate the validity of the refuge and thereby dismiss it. I am submitting this letter and the attached documents in hopes that county planners will choose to take a more serious look at the Stanford Refuge during their current review of the Stanford Community Plan.

The Stanford property was designated a California state legislative refuge base on its value as a wildlife study area. Both the current EIR and Community Plan fail to properly identify the refuge and the value of its wildlife resources in this context.

Here are my specific concerns:

- 1. The Santa Clara County general plan is not in compliance with section 65560 of the California Government for failing to identify the Stanford Refuge (F&G Code 10836) as an open space resource. I first notified the county of this oversight in the attached June 13, 1989 letter.
- 79-2 2. The Stanford Community Plan should identify the Stanford Refuge as an open space resource as prescribed in section 65560 of the government code.

- 79-3 3. The EIR should obtain comments from appropriate state agencies and officials regarding cumulative environmental impacts of the proposed project to the integrity of the refuge as a wildlife resource area pursuant to Section 21104 of the Public Resources Code:
- 4. This request only pertains to proper identification of the Stanford Refuge as a wildlife resource area pursuant to the California code sections listed above and CEQA. I am *not* requesting any information, comments, or discussion regarding any criminal violations of the F&G code, i.e., hunting or "taking" of wildlife resources from the refuge. This was apparently a great source of confusion for CDFG, Stanford, and other officials when I first brought the matter to their attention in the late 1980s.

I have attached relevant sections of the 1989 GUP and correspondence.

Sincerely,

Eric Fertig

Attachments

- A. 1988 GUP DEIR discussion of Stanford Game Refuge.
- B. 10/13/88 comments on the DEIR.
- C. Final EIR response to my comments.
- D. 6/13/89 response to Final EIR comments.
- E. 5/3/88 letter to San Mateo County.
- F. "Chronology", a 1987 document I authored summarizing my research, which I submitted to the county as part of a large file in 1987. Ironically, the first two paragraphs of the DEIR appear to be lifted directly from my document. They also fail to cite it and quote out of context.

Attachment A. 1988 GUP DEIR discussion of Stanford Game Refuge

Foothills and establishment of plantings along Sand Hill Road. Oak regeneration on University lands has been initiated by the establishment of an oak direct seeding program. The program has three objectives: 1) to establish seedling oaks within each of six areas designated "high priority" in the Vegetation Management Plan; 2) to document procedures and results to provide guidance for future direct seeding; and 3) to publicize the need for — and benefits of — oak regeneration on Stanford lands. The program was established in 1984.

Phase II of the "Vegetation Management Plan" will cover the central campus area. The plan will provide specific guidelines for revegetation and enhancement of existing street trees and other vegetation.

Phase III will cover the Arboretum area of the campus.

STATUS OF STANFORD'S CAMPUS AS A WILDLIFE REFUGE

Stanford University was designated by the State legislature in the 1920's as a Department of Fish and Game Wildlife Refuge. Because it was specifically set aside as a wildlife (ornithological) study area rather than a game propagation area, it differed from all other refuges in the system at that time.

In 1950, the State Legislature enacted statutes which allowed refuges to be opened to deer hunting when such refuges had been subject to over browsing. The University appealed the opening of the refuge in 1951, but the Fish and Game Commission denied the request. As a result, state refuge signs were removed from the campus and all patrolling and management ceased. In 1953, however, the legislation which allowed opening of the refuges was repealed. Stanford was once again closed to hunting but patrolling and management of the refuge was not reinstated.

Because of the existing designation of Stanford land as a State Refuge the State Fish and Game Commission has the power to regulate, take, and manage the fish and wildlife on the campus. Specifically, Fish and Game Code Section 10502 states that the Commission may exercise control over all mammals and birds in any game refuge and exercise control over all fish in any fish refuge, and to regulate the "taking" of any fish or wildlife.

In recent interpretations of the Fish and Game Code, the Department of Fish and Game has clarified the designation of the Campus as a Wildlife Refuge and its regulation and prohibition on the "taking" of fish or wildlife. As general policy, no hunting or fishing is allowed in a designated Wildlife Refuge. This has been interpreted as the original intent of the legislation that established the Refuge in the 1920's. The term "taking" refers to harvesting (hunting or fishing) of resources only. \(^1\)

Although the narrow interpretation of "taking" has been used to prohibit hunting and fishing on State Refuges, the U.S, Fish and Wildlife Service, under the Federal Endangered Species Act, and some biologists with the Department of Fish and Game have used a much broader interpretation of the term. The prohibition on "taking" has been applied by these biologists to include restrictions on destruction, conversion, or modification of fish or wildlife habitat, as well as the harvest or collection of the species themselves.

According to the Department of Fish and Game, there are a number of refuges in the State which have the similar designation as the Stanford campus, and where the Department essentially does nothing to manage or patrol the refuge. Currently, there are a few signs posted on the Stanford campus but there is no Fish and Game enforcement of the refuge. The Department will not use Stanford's refuge status to restrict development nor to dictate planning on the campus. The Department will however comment on proposed land use development plans under CEQA and the applicable sections of the Fish and Game Code. 3

RARE AND ENDANGERED SPECIES

There are a number of rare plant and animal species known to occur within the San Mateo and Santa Clara counties vicinity of the Stanford University campus. These are listed in Table 10-1. The list was compiled from records at the California Natural Diversity Data Base (CNDDB).

One of the species listed in Table 10-1, the Bay checkerspot (<u>Euphydrvas editha bayensis</u>) has been observed on the campus (CNDDB 1986). The Bay checkerspot is a butterfly which is known to occur in the Jasper Ridge Biological Preserve. The species is typically found in areas of serpentine rock and serpentine-derived soils. The other species listed in Table 10-1 are not known to occur presently on the Stanford campus. The San Francisco

Jaunell Waldo October 13, 1988 Page 5

ed. I have spent two years examining eighty years of government documents, court records, and literature relating to the refuges, and have found nothing comparable to the situation at Stanford.

- (4) The Fish and Game Department is not the only agency responsible for protecting the resources in a legislative refuge. Legislative refuges meet the definition of resources protected by Section 65560 of the Government Code. The county's General Plan should make note of the refuge and the wildlife resources it protects. A partial list of counties which have included legislative refuges in their general plans include: San Mateo, Monterey, Tehama, Modoc, and Plumas Counties. Tehama County specifically names §65560, and includes the state game refuge there as part of the inventory protected by that section of the code. San Mateo County specifically names Division 7, Chapter 1 of the Fish and Game Code which deals soley with legislative refuges or state-owned preserves.
- (5) Section 10502 of the F&G Code does not authorize the Commission to regulate the take, as the DEIR erroneously states. Nothing in section 10502 gives the commission such powers. They are prevented from regulating the take by Section 204. Instead the commission authorizes the department to issue permits to take certain animals. In the '30s and 40's these were animals considered destructive to the resources such as cougars, coyoties, opposum, etc., and more recently feral pigs at Tamalpais.
- (6) The Commission, rather than the legislature opened Stanford in 1950, because the department complained about the time and manpower required to enforce the refuge laws. The legislature amended the code in 1953 to prevent these openings, because they were being used to shut down refuges completely, as was done at Stanford. Enforcement should have resumed in 1953.
- (7) Under CEQA, the department is responsible for commenting on the status of this refuge and any projects which might have a significant impact on the refuge, and thus effect the continued benefit to the state's wildlife conservation program.

Sincerely

Eric Fertig

Attachment C: Final EIR response to comments

Comment 31-1

To date, no comment has been received from the Department of Fish and Game regarding the issue of the designation of Stanford University as a wildlife refuge.

Comment 31-2

The EIR discusses the compatibility of proposed development actions with existing and proposed land uses, zoning, and plans. These latter include the Santa Clara County General Plan, the Palo Alto Comprehensive Plan, and various Stanford Campus plans. A description of existing land use designations is appropriate environmental setting information for the EIR. In this regard, the status of the Stanford Campus as a Wildlife Refuge is an appropriate discussion.

Regardless of the historical route taken in the designation of the campus as a wildlife refuge, the fact of its designation and the complex issues related to its status remain. The situation currently at Stanford is unique in that compared to other designated wildlife refuges, the level of urbanization is relatively high. Large areas of the campus, such as the foothills, nevertheless remain in relatively undisturbed open-space.

As the EIR states, according to the best available knowledge, the prohibition of hunting and fishing on the Stanford CAmpus is in effect. As far as habitat preservation is concerned, the Department of Fish and Game has a number of legislative and administrative procedures to review proposed development plans and to ensure the protection of fish and wildlife habitat. These include, CEQA and the various Fish and Game Codes for the protection of streambeds, fish and riparian Vegetation (F&G Code Section 1601-1604), native plants (F&G Code Section 1901-1904), and rare and endangered species (F&G Code Section 2050-2191).

June 13, 1989

Jaunell Waldo
Santa Clara County
Office of Planning
County Government Center
70 West Hedding
San Jose, CA 95110

SUBJECT: Stanford General Use Permit Final EIR

Dear Ms. Waldo:

Thank you for providing me with a copy of the EIR. I have reviewed the response to my letter (listed as Letter 31) and would like to submit my comments on the Final EIR at this time.

Comment 31-1 concerned the failure of the Department of Fish and Game to enter its comments into the record during the DEIR review period. Response 31-1 states that no comment has been received from the DFG regarding the Stanford Game Refuge. The Department made no comment on any issue for the current DEIR. It did, however, comment during the 1986 review. These comments were made late in the review period by telephone because DFG officials had not received a copy of the DEIR from the State Clearinghouse. In a 1986 phone conversation, you provided me with a summary of their comments from your notes which were as follows:

Larry Week, Acting Environmental Coordinator for Region 3:
Fish and Game had not commented originally, but they'd like to
do so now. The description of impacts to wildlife are incomplete and vague. Would like better description of the wildlife
species present, and potential impacts upon them. Specific
mitigation measures to deal with those impacts.

Linda Ulmer, Acting Field Biologist, Region 3:

Be sure to mention that it is a fish and game refuge, designated as such by the legislature in the 1920's, for all of Stanford except the original quad. (She then named the applicable code sections. The reference to boundaries are incorrect.)

Comment 31-2 states that the EIR's discussion is inappropriate because:

(1) For the 1986 project the DFG had included a request for

PAGE 2

cumulative wildlife impacts in its comments to the county and had determined that development could have a significant adverse impact on wildlife. It therefore requested a discussion of the refuge in that context.

The EIR was used as a forum to re-state Stanford's position that the above request was invalid, rather than to identify the impacts and provide mitigation. The EIR could provide no written substantiation from the DFG that it had in fact reversed its original request and no written commentary to corroborate the DEIR's assertions. The DFG's legal department had only dealt with the subject of the Fish and Game Code and whether land development constituted a "take" of the resources. Conversely, the DFG's legal advisor had subsequently indicated to me that the request to address the refuge in the County's General Plan and environmental documents was perfectly appropriate. If the the DEIR challenges the notion that the refuge is a relevant land use issue, why then does the response state that "a description of existing land use designations is appropriate environmental setting information?" The DEIR was used to dismiss the previous CDFG comments which had determined that it was an appropriate land use impact.

Response 31-2 also states that the DFG has a number of legislative and administrative procedures to review a proposed development. While there are existing state and federal laws to protect wetlands and endangered species, these do not necessarily differentiate the entire region for its wildlife resources, as the state legislature has previously established. The purpose of CEQA is to provide for just such an evaluation by the lead agency, an evaluation which may include expert commentary by CDFG officials.

As I stated in my letter, Fish and Game officials—the Regional Manager, Commission Executive Secretary, CDFG legal council—have indicated that legislative refuges should be identified as open space resource as defined in Section 65650 of the Government Code. The counties I mentioned, those which have made reference to legislative refuges in their general plans, did so solely because they were so designated by the legislature. For instance, San Mateo County identifies the San Francisco Fish and Game Refuge in its General Plan (Part 1, p.119, Sec.11D; p.120, Sec.F; Part 2, p.1.2P, Sec.1.8; p.1.5P,Sec.1.19; pp.1.7, 1.8, Sec.1.27-1.32). The County also identifies that refuge by name on its zoning maps and zones the entire refuge open space. Unless the refuge itself is properly identified as a wildlife resource area, the effects of past and future development cannot be adequately assessed.

PAGE 4

Stream closures are not fixed, and enforcement and propagation programs are carried on at the department's discretion.

While the boundaries described in Section 10836 of the F&G Code comprise the entire campus, the acreage that the university Biology Department uses seems to have been reduced by less formal means. The DFG's 1927 Biennial Report described the refuge as comprising 8500 acres, but by 1950 a Palo Alto Times article described it as "the Stanford Game Refuge, a 7000 acre wildlife laboratory." Because the Biology Department no longer uses the eastern foothills, and ended its use of Felt Lake in the early 1970's, the value of those resources at present is difficult to identify. I would suggest that the Stanford Refuge is a strong candidate for having its boundries reduced in size—as has been done at a number of other refuges—at least beginning with the 1190 acres still used at Jasper Ridge, and certainly excluding those areas of no wildlife value, such as the urbanized southeastern periphery. Under these conditions the issue of preserving the refuge's wildlife population could be more easily defined. On the other hand, by ignoring the issue entirely, the county is taking a position which, as I have demonstrated, is contrary to the views expressed by Fish and Game officials, and the positions other counties have taken in adherence to CEOA and local planning statues.

Sincerely,

Eric Fertig

Attachments: Correspondence with CDFG.

Attachment E: 5/3/88 letter to San Mateo County

455 Ferne Avenue Palo Alto, California 94036 May 3, 1988

Mr. Kim Vogl Office of Planning County Office Building 550 Hamilton Street Redwood City, CA 94063

Re: Stanford Lands Area Plan/County General Plan

Dear Mr. Vogl:

As I stated in my last letter, I would like to submit a written summary of my concern over the failure of the San Mateo County General Plan to address the Stanford Game Refuge. This brings into question the plan's reference to two legally identical refuges as being "protected by state law" and thereby designates them "sensitive habitats" subject to mitigation policies required for areas designated as such.

My contention that a county general plan should examine any any legislative refuge is based on a September 1986 telephone conversation with the Executive Secretary of the Fish and Game Commission and subsequent corroboration by the CDFG's legal council and regional manager. The idea is given still further credence by the fact that San Mateo County's general plan discusses the state law as it relates to legislative refuges, and which refuges are so designated. The county's legislative refuges include:

REFUGE TYPE	Fish and Game Code
Game Refuge: San Francisco Stanford	§10771,§10509 §10836
Fish Refuge: San Francisco	§10771,§10509
Marine Life Refuge: Fitzgerald	§10909

Yet the general plan only mentions the San Francisco and Fitz-gerald refuges. It completely passes over the Stanford refuge.

Mr. Kim Vogl May 3, 1988 Page 2

Part 1, Chapter 1 of the general plan defines sensitive habitats as follows:

Page 119-

II(D) Sensitive Habitats

(1) Sensitive habitats are areas where the vegetative, water, or fish and wildlife resources provide particularly valuable plant and animal habitats. They can be easily disturbed or degraded by human activities and developments. Sensitive habitats include:
(1) habitats containing or supporting rare or unique vegetation, fish, or wildlife; (2) riparian corridors; (3) marine and estuarine habitats; (4) wetlands; (5) sand dunes; and (6) wildlife refuges, reserves, and scientific study areas.

The plan then elaborates on what constitutes each of the above six categories:

Page 120-

f. Wildlife Refuges, Reserves, and Scientific Study Areas

The wildlife refuges and reserves protected by state law³⁴ are the James V. Fitzgerald Marine Reserve, the Ano Nuevo State Reserve, and the San Francisco State Fish and Game Refuge.

Footnote 34 defines refuges protected by state law as follows:

These refuges and reserves are designated and protected by the State of California Fish and Game Codes 1980, Division 7, Chapter 1, "Refuges."

In fact, Division 7, Chapter 1, is a set of provisions which apply equally to all of the refuges listed in Division 7, Chapter 2, which includes all three of the county's previously mentioned refuges, Stanford, Fitzgerald, and San Francisco. (The footnote implies that Ano Nuevo is a legislative refuge, however, it is instead a state-owned reserve and is not protected under Division 7, Chapter 1 of the F&G Code. I confirmed this with the legal councils to the DFG and the State Department of Parks and Recreation.)

In addition to missing Stanford in the discussion section, the map of sensitive habitats in the appendix also fails to outline the Stanford refuge, while clearly outlining and labeling Fitzgerald and San Francisco. The county's zoning maps do likewise.

Part II of the general plan calls for a policy of applying strict mitigation measures to any project situated in areas

Attachment F: 1987 Chronology document

Dear Ms. Jones,

What I find noticeably lacking in public discussion on Stanford's proposed GUP and DEIR is the impact on community services and facilities. Please include the my letter below in the public record for consideration by the Santa Clara County Planning Commission.

Thank you for considering my thoughts.

Howard Franklin

Date:

August 6, 2000

то.

Santa Clara County Planning Commission

From:

Howard Franklin, 2340 Princeton Street, Palo Alto 94306

Community services and facilities impacts of Stanford's proposed

General Use Permit

Please include this letter in the public record that you are considering as you develop your response to Stanford's proposed General Use Permit and Draft Environmental Impact Report.

I have been a resident of Palo Alto for 31 years, and I am not writing you about the "good old days". I am writing you about critical needs that I believe must be considered to have "good go-forward days".

There seems to be much public sentiment about the need for open space and the need for the mitigation of traffic impacts from additional development on the scale that Stanford has proposed. I applaud that discussion and believe these problems to be serious and worthy of specific mitigation programs.

- 80-1 What I find noticeably lacking in public discussion is the impact on community services and facilities. I have first-hand experience over the last 20 twenty years with the difficulties of recreational soccer programs, both youth and adult, finding soccer fields in the face of the tremendous (and, in my opinion, wonderful) explosion in demand. I think it is safe to assume that the overwhelming benefits of soccer programs are well understood, and I will avoid expounding upon them. I have valued for myself the Palo Alto recreational dance programs, and for my children the sports, art, and science programs.
- 80-2 I also have first-hand experience at Escondido School watching Stanford students climb over the fence to use the school's basketball courts (and leave their trash). It seems as though new housing was constructed at Stanford without providing even minimal recreation facilities.

The proposed expansion of housing at Stanford will, in my opinion, make a scarce resource even scarcer, specifically in the Escondido / Nixon

schools' attendance area. I do not expect Stanford to cure existing problems, but I do expect them to mitigate problems creating by additional population on campus. The expanded community at Stanford will continue to attend our schools, and they will continue to participate in our community and recreational programs.

The County has its greatest leverage now with Stanford to address this problem, and I believe you must take this opportunity to look ahead to what our community will need. My understanding is that the City of Palo Alto can only play an advisory role in resolving this matter and that the County of Santa Clara is the public's decision-maker.

Stanford is a good neighbor, but they are also a large developer, and in other communities large developers pay large community services impact fees. I believe that Stanford should be no different.

Regarding the third middle school / need for community facilities issue, I offer the following specific suggestion. Consider encouraging the City of Palo Alto 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 that area for building a community service facility which could, in part, be leased to the Jewish Community Center. The Terman site is, in my opinion, 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 that cannot easily get to either of the existing middle schools. Again I do not fully understand the jurisdictional boundaries here between the City and the County, so please consider the spirit of this suggestion and consider adapting it in a way that satisfies the jurisdictional constraints that need to be satisfied.

As an involved parent, I have been following the process of trying to establish a third middle school. It seems to me that both the City of Palo Alto and the County of Santa Clara have not exercised appropriate leadership on such an important community issue. For example, when Stanford and PAUSD agree on things like a large payment from Stanford that the school district would use to expand the Palo Alto High School site, the overall "plan" for our city gets lost. Another example is the impact of recreational space on school sites arising from the PAUSD Building for Excellence construction and growth in school population. Please take a more active role in helping to resolve the third middle school issue in a way that takes into consideration our community's overall needs.

I strongly encourage you to consider the impacts of Stanford's proposed General Use Permit on the demand for community services and facilities. I have not been able to find much reference to these areas in Stanford's plans.

Thank you considering my comments.

Sincerely,

Howard Franklin

Santa Clara County Planning Commission. c/o Sarah Jones, County Planner.

Aug 6, 2000

Dear Planning Commission Members,

Re. Stanford's General Use Permit and Access to Open Space

The point I would like to address is one of balance between development and its mitigation. Given the massive ongoing development by Stanford, an obvious question is what the surrounding community gets in return for being subject to the congestion and pollution of various kinds that such development engenders. Stanford is in the fortunate position of being able to provide breathing space in return, but seems to be increasingly arrogant, inward looking and reluctant to do so.

Until quite recently, Stanford has provided relatively reasonable stewardship of its lands and has recognized the need for balance. Thus, for example, as development started to accelerate in the 1970, most commendably it opened access to the Dish area to the community as a whole. However, just as its development is now taking off exponentially, Stanford has, in fact, done a U-turn in terms of access to its open space. It has arbitrarily banned access the Dish area to people walking with dogs, and has hinted that total restriction for non-Stanford people might well be on the cards.

As an aside, one is here reminded of the actions of Palo Alto City Council in the 1970s in regard to what is now Johnson Park. In the face of increasing development in the downtown area, realizing the value of the parcel, the Council originally voted to reverse the plans for a park in that location in favor of an intensive housing development. Fortunately, tenacious action by some downtown residents eventually resulted in the wonderful park we see there today, a key element in preserving the residential character of the Downtown North neighborhood. Everyone in fact gained from that reversal.

81-1 As another aside, Stanford has managed to put its foot in it again. The result of the ban on dogs is clearly discriminatory. Not just against people with dogs. Having spoken to a large cross section of people on the hill during my jogs and signature gathering there, what also becomes evident is that the edict especially discriminates against women who like to, or are able only to walk there on their own. Except for the weekends, there are in fact very few people up there, and the ability to have a dog as company becomes a safety concern for people walking on their own.

In terms of the broader issues, the ban on access to the Dish for people with dogs may be considered by some to be small potatoes. However, I would suggest it is particularly indicative of Stanford's current thinking, attitudes and longer-term plans. A key feature here is that the ban is completely arbitrary. Stanford put the ban forward as an

environmental issue. However, it is well accepted that dogs on leashes have far less of an environmental impact there than the people, cattle, motor vehicles, tractors etc. that regularly access the Dish area - the transparent excuse actually makes Stanford look rather foolish. What the ban really constitutes is a show by Stanford that it can do whatever it likes on its own property. (Can the rest of us?).

To me it thus suggests that spurred on by its recent successes in realizing long coveted proposals such as the Sand Hill Road extension and related developments, Stanford is, sad to say, succumbing to the arrogance that typically comes from exceptional wealth and power. That wealth has recently been amplified by the millions in donations pouring in from the alumni who have made their fortunes in high-tech enterprises, often related to their Stanford origins and contributing to the development boom in this area.

81-2 Stanford therefore appears to be in danger of losing that sense of stewardship and balance that it has largely exercised in the past. Clearly, a good balance between development and open space will ultimately be of benefit to all, including Stanford itself. As in the case of Johnson Park and the City of Palo Alto, it may similarly be timely for the community outside Stanford to help them place things in their proper perspective. I would therefore urge the Planning Commission to keep examining with great diligence the implicit signals being sent by Stanford, and to ensure that the development by Stanford is mitigated by not only open space, but open space accessible to the surrounding community at large.

٠,...

Sincerely,

Walter Sedriks

325 Waverly Street Palo Alto, 94301 sedriks@earthlink.net 650-329-0554



PGard0634@aol.c

To: sarah.jones@pln.CO.Santa-Clara.CA.US

08/06/00 11:32 AM

Subject: Foothills

Aug 6, 2000 731-D Loma Verde, Palo Alto, CA 94303

Sarah Jones Santa Clara County Planning Dept 70 W. Hedding St., 7th Floor, San Jose, CA

Dear Ms. Jones,

I have lived in this area for 25 years and it seems that we are 82 -1 turning into a L.A. type of environment. Vacant lots are being filled in, orchards disappearing, roads and highways are getting bigger. I feel our quality of life is being eroded. Please protect the Stanford Foothills from development. What a visual relief to drive along and see nature!! I lived in San Jose for a few months and hated it because I felt the City was sprawled all over the place; what unwise planning! Other major universities, remain major word class universities without sprawling all over the place. Let Stanford infill and build up not out!!!

Paul Gardner



Joannemarent@ao I.com

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

08/06/00 10:57 AM

Subject: Stanford expansion

Hello Sarah,

As a Palo Alto native for 38 years, I am extremely disappointed in Stanford. I remember flying my kite on Frenchman's Hill -- before it was the housing development it is today. It infuriates me to think my children could witness the same development of the dish, deer creek road area, and everything else west of foothill.

83-1 I know Stanford feels it needs to expand to remain the world class educational institute that it is today, but that expansion should take place, and more importantly CAN take place, within the existing campus geography. Was it Harvard or MIT that exist on a smaller geographical area than Stanford -- I'm sure there are many other top institutions that don't have the luxory of open space that Stanford does and yet remain quality schools because they have planned well and utilized their existing space effectively. And, if Stanford didn't have the dish, they too would keep development within their existing campus area. Perhaps thorougly analyzing the other options within their limits might prove that expansion west of Alameda isn't necessary and siting other top schools that remain concentrated in smaller geography could help.

Secondly, as a world reknowned institution, Stanford should set an example for others. What a statement they would make by declaring land west of Alameda as permanent open space -- they would show they can sacrifice to aid an important cause like the environment. They can AFFORD it and they would be setting an important example for the world.

I believe that the new limited access to the dish and the 20,000 sq foot planned Carnegie think tank are just their attempt to prepare the community for their ultimate goal of expansion in to the foothills. This makes me sick. Please let me know how I can get involved, or if it's too late in the game to help.

Joanne Marent

PUBLIC COMMENTS

REGARDING THE

Stanford University

Draft Community Plan
and
General Use Permit Application

Draft Environmental Impact Report

Dated: June 23, 2000

Submitted by:

THE SAVE STANFORD GOLF COURSE COMMITTEE

August 7, 2000

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LAW OFFICES OF

ERSKINE & TULLEY A PROFESSIONAL CORPORATION

220 SANSOME STREET, SUITE 600 SAN FRANCISCO, CALIFORNIA 94104 PHONE: (415) 392-5431 FAX: (415) 392-1978 MORSE ERSKINE (1895-1968) J. BENTON TULLEY (1908-1974)

August 5, 2000

Santa Clara County Planning Commission Attn: Sarah Jones, Planner 70 West Hedding St., East Wing, 7th Floor San Jose, Ca. 95110

Re: Comments on Draft EIR
For the Stanford University
Draft Community Plan
And General Use Permit Application,
Submitted by
The Committee to Save the Stanford Golf Course

Dear Planning Commission,

Stanford University has come to the County of Santa Clara with a Draft Community Plan and General Use Permit Application which together call for an unprecedented amount of construction at the University over the next 10 years. Stanford's plans would entail 2 Million square feet of new academic and administrative buildings on the main Stanford campus, together with 2,000 new residential units.

Threatened by Stanford's massive construction plan is the historic Stanford Golf Course. Built in 1929 by master designer and naturalist George C. Thomas Jr., the golf course was conceived simultaneously as a championship golf course, a nature preserve, and an open space landmark. Thomas succeeded on a grand scale, and today the golf course is known worldwide as the home of great golfing champions. Just as significantly, its mile and one-half of riparian forests, its heritage oak groves and native grasslands, are a haven to the California Tiger Salamander, red-legged frog, and several other threatened bird and animal species. As a work of functional landscape architecture on the campus' northwestern corner, Thomas' golf course is a worthy companion to Frederick Law Olmstead's more formal Palm Drive.

Under the University's development proposals, the Golf Course's 175 acres would be rezoned from Open Space to the development-friendly Academic Campus designation, and then cut up for housing, beginning with the 15-acre First Hole. The Golf Course's open space, environmental, artistic, and sporting values would be damaged. The University's land developers and planners explain their seeming drastic action by saying that they cannot

find, anywhere on Stanford's 1,773-acre core campus, another suitable site for medium-density faculty-staff housing.

However, analysis of Stanford's Draft Community Plan and General Use Permit, together with the County's June 23, 2000 Draft Environmental Impact Statement, makes clear that there is no true need for Stanford to cut into its golf course. Abundant suitable acreage exists for housing on campus--in hundreds of acres of surface parking lots, eucalyptus stands, corporation yards, and other underutilized spaces tucked throughout the campus.

Thus it appears that the Golf Course is jeopardized not by a true lack of land for faculty housing, but rather by uninspired land planning on the part of the University. Instead of taking the lead with a far-sighted plan to help the community cope with Stanford's unprecedented construction demands, the University has brought forth the same kind of plan for low-rise development that it has employed in the past-sprawling toward the Foothills as fast as improvident land use planning can take it, indiscriminately consuming treasured open space at it goes.

The Foothills start at the Golf Course. In these times of urban growth and traffic jams, it is more important than ever for communities, including Stanford University and its Mid-Peninsula neighbors, to use land carefully so as to preserve and protect the great open spaces and historic treasures such as the Stanford Golf Course. This is particularly true for a University, whose function is to pass on the treasures of the past to the generations of the future.

If Stanford University neglects the good stewardship of its heritage, if its planners and developers and political consultants cannot distinguish the University's shrines and treasures from its parking lots, then others in the greater Stanford community, and members of neighboring communities, will step forward to ask the County of Santa Clara to help Stanford find its way.

The Committee to Save the Stanford Golf Course is comprised of Stanford students, faculty, staff, golf club members, alumni, and community friends. By this letter, the Committee submits its comments on the Draft EIR.

84-1 I. THE UNIVERSITY PLANS TO CUT UP
THE STANFORD GOLF COURSE
FOR ROADS AND HOUSING DEVELOPMENT.

Stanford University submitted to the County of Santa Clara on November 15, 1999 a Draft Community Plan and companion General Use Permit Application ("GUP"), which would, in combination, cause threatened and actual damage to the Golf Course in the following particulars.

- 1. The Draft Community Plan asks the County to remove the 175-acre Golf Course from its current Open Space protection, and to recharacterize the lands in Holes Nos. 2 through 18 as "Academic Campus," a development-friendly land use category which would enable the University, at will, subsequently to apply for permits to build all manner of academic and academic-support facilities, from post offices to classrooms to residences to corporation yards. (See Draft Community Plan, pages 18, 20, 22, and compare Draft EIR Figures 4.1-3 and 4.2-4.)
- 2. The Draft Community Plan also asks the County to redesignate the land use of the 15 or so acres occupied by Hole No. 1 from Open Space to Campus Residential-Moderate Density, with a density range of 8-15 units per acre. (See Draft Community Plan, page 20, and Draft EIR Figure 4.2-4.)
- The GUP seeks issuance of a use permit to construct somewhere between 304-570 units of faculty-staff housing on a a 38-acre parcel which includes the 15 acres of Golf Course Hole (See GUP, page 5.) Neither the GUP nor the Draft Community Plan specify where, or even if, Hole No. 1 would be replaced on the Golf Course. However, the University in a "Summary and Explanation" booklet submitted to the County with President Gerhard Casper's November 15, 1999 Letter of Transmittal, states at page 8 that Hole No. 1 "must be moved to the golf course lands south of Junipero Serra Boulevard.... The location of the hole and possible adjustments in other holes have not been determined." The lack of certainty in the University's Hole No. 1 relocation plans is apparent in the Draft EIR, which at Figure 7-3 in the "Alternatives" section designates an Lshaped parcel of land <u>north</u> of the existing Hole No. 2 as the "Relocation Site" for Hole No. 1 and the Driving Range. No specific course rerouting plan for Hole No. 1, or engineering plans, or golf architect's plans, have been produced to date by the University.
- 4. The GUP also seeks County approval for Stanford to "aggressively pursue" faculty/staff housing in the West Campus District, a development district which includes the Golf Course. (See GUP, page 6 and Exhibit "b" thereto.) This language is

ambiguous: is Stanford asking for permission to pursue yet additional housing construction in and/or around Holes 2 through 7 of the Golf Course? University spokesman Larry Horton denied this in a July 25, 2000 meeting with the combined Stanford Men's and Women's Golf Clubs. However, additional housing construction on Holes 2-7 of the Golf Course is discussed as a development alternative in the Draft EIR. (Alternative HOUS-B, at DEIR, p. 7-45.) Moreover, an unsigned, undated Stanford Department of Athletics internal memorandum captioned "DAPER Capital Project Look Ahead 2000-2008," says that the Athletics Department "... anticipates having to relocate the lower nine holes of the golf course within the next 7-10 years." (A copy of this memorandum is appended hereto as Exhibit 1.)

- 5. The GUP, at page 7, seeks a general use permit from the County for a road-widening project which has the potential to affect Hole No. 1, in the event that hole is not ultimately displaced by housing. This road project would involve the widening of West Campus Drive, in the area between Junipero Serra Boulevard and Stockfarm Road, from its current two lanes to four lanes. The effect of this road project on the Golf Course is uncertain, because no engineering drawings for the road widening are submitted with the GUP, nor with the Draft EIR. Accordingly, we cannot tell whether the University's intention is to widen the road to the west, into the current Golf Course lands, or to the east, into the driving range parking lot.
- 6. Not identified in the GUP or the Draft Community Plan, but discussed in some detail in the Draft EIR, is another road impact, the so-called "New Roadway Alternative," which would destroy the back nine holes on the Golf Course. This "Alternative" would push a four-lane road southwest from the intersection of West Campus Drive and Junipero Serra, up the Golf Course access road and straight across the 18th, 11th, and 16th fairways, to connect Sand Hill Road with Highway 280, at an intersection on Alpine Road near the Alpine/280 interchange. The purpose of this new road would be to relieve bottlenecked traffic on Sand Hill Road. (See Draft EIR, pages 4.4-84-85, and Figure 7-4.)
- 7. The Driving Range is listed as a possible site for future graduate student housing in the Housing Sites chart, Table 2-1 of the Draft EIR, at page 2-13. Figure 7-3, in the Alternatives Section of the DEIR, shows a combined "Relocation Site" for the Driving Range and Hole No. 1 to be located in a vacant lot alongside Sand Hill Road across the street from the Oak Grove Apartments and in the old dressage field to the right of Golf Course Hole No. 2. However, Figure 7-3 is conceptual only; no exact location, and no specific plans, no details of night lights, safety nets, parking lots, equipment sheds, or

other Driving Range support facilities, are described in Figure 3 or any other documents made public in the EIR process.

Thus does the Peaceable Kingdom of the Stanford Golf Course find itself in harm's way.

- 84-2 II. THE STANFORD GOLF COURSE IS AN HISTORIC TREASURE,
 THE FINAL WORK OF A MASTER ARCHITECT AND NATURALIST,
 THE HOME OF SEVERAL OF HISTORY'S GREATEST PLAYERS,
 AND A LANDMARK IN THE GOLF WORLD.
 - A. The design is a legacy of the great architect and naturalist, George C. Thomas, Jr.

As a work of historically significant landscape architecture, the Stanford Golf Course compares favorably to Frederick Law Olmstead's Palm Drive and Oval. Built in 1929, the Golf Course was the final design work of George C. Thomas Jr., one of the major figures from America's Golden Age of golf architecture, the author of the leading treatise, "Golf Course Architecture in America".

(For authority supporting this and other assertions in this section, see Letter of *Golf Magazine* architecture critic and author Geoff Shackelford, August 4, 2000, a copy of which is appended hereto as Exhibit 2. See also page excerpts from Mr. Shackelford's book, "The Captain: George C. Thomas Jr. and his Golf Architecture," Sleeping Bear Press, 1996, Exhibit 3; "By Design: George C. Thomas Jr.," article appearing in Golf Magazine, August, 1998, Exhibit 4; and Stanford Daily stories as collected in page excerpts from "Stanford Golf Clippings 1899-1931," Gordon Ratliff Editor, March, 1996, Exhibit 5.)

At Stanford, Thomas and his collaborator, William P. "Billy" Bell, created one of the world's finest golf courses--a masterpiece of classic design, strategic challenge, and surpassing beauty. Over the years, the Stanford course has been recognized as one of the 100 greatest golf courses in America, most recently by Golf Week Magazine in 1998. By acclaim it is regarded as among a handful of the finest university golf courses in the world.

Thomas was a naturalist, a deep sea fisherman, dog breeder, and rose enthusiast who created more than 40 varieties of roses for the commercial market. An intellectual, he wrote treatises on rose breeding and dog breeding in addition to his seminal golf architecture writings. Thomas appreciated nature, and integrated his courses with it, rather than imposing the courses upon nature. At Stanford, Thomas and Bell individually framed the holes within their natural surroundings; there are

only three places on the course where the fairways are parallel: 10/11, 12/13, and 10/18.

The site for the Golf Course was originally chosen by Almon Roth, Stanford's Comptroller in the late 1920s. However, at the insistence of the architects, the University swapped lands with the Buck Estate in order that San Francisquito Creek could be brought into play on a number of the holes: Nos. 3, 4, 8, 12, and 14; a tributary is in play on Holes Nos. 1, 6, 9, and 15. In constructing the course, Thomas and Bell took pains to leave nature as they found it. A news story in the June 25, 1929 Stanford Daily reported that, of the estimated 5,000 oak trees on the property in its natural state, the architects removed only 75. (See Exhibit 5.) As a result, the Golf Course has large interstices of native grasses, stands of heritage valley oaks, and the riparian forest, all in their original state so as to sustain the native wildlife.

This is classic George Thomas golf--a course that is at one with the surrounding nature. This is the personality and great beauty of the Stanford Golf Course, and it is known and beloved throughout the world of golf for this personality and natural beauty. (See article, "Lost in Paradise," Golf World Magazine, July 14, 2000, p. 16, in which golf architecture critic Ron Whitten says of a newly-built course, "The Preserve is California architecture in the tradition of Stanford GC or the Meadow Club [Marin County]. It is part of its surroundings, not distinct from it." (Emphasis added.) (Copy appended hereto as Exhibit 6.)

B. Stanford is the home course to some of history's greatest players, a national championship venue, and a significant resource in the world of golf.

It is no coincidence that several of golf's greatest champions have been attracted by this golf course to Stanford. The July, 2000 issue of Golf Digest Magazine featured a story listing three Stanford golfers--Mickey Wright, the greatest woman player of all time, 5-time British Open winner Tom Watson, and Tiger Woods--as among the 12 greatest golfers in the history of the sport. (Copy appended as Exhibit 7 hereto.) No other university or golf course in the world can make a similar claim; nor does any other athletic program at Stanford University have a comparable roster of history's greatest sportsmen.

The Stanford Men's team of 1938 was the first team from west of the Mississippi to win the NCAA championship; this was followed by national championship teams in 1939, 1941, 1943, 1946, 1953, and 1994. The 1999 Stanford women's team finished

second in the NCAA championships; the women have for years consistently ranked among the top 10 teams in the nation.

Although Tiger Woods is the best-known of Stanford's recent golf alumni--and perhaps the best-known athlete in the world--Tiger's Stanford teammates Notah Begay and Casey Martin have had significant impacts upon the sporting world. Martin, who suffers from a rare circulatory disease in his leg, has successfully challenged the United States Golf Association and the PGA Tour, under the Americans With Disabilities Act, to allow him to ride a cart to compete in professional and national tournaments. Begay, the first Native American to compete on the PGA Tour in 25 years, has won four professional tournaments within the past year, and has distinguished himself on and off the golf course by his humor, his personal courage and honesty.

Generations of other Stanford alumni have become leaders in the golf world as authors, commentators, designers, and businesspersons. Stanford alumni include United States Golf Association past presidents Sandy Tatum and Grant Spaeth, and two members of its current governing board, Walter Driver and Peter James. Michael Murphy, a founder of the Esalen Institute and the author of the golf mystical book "Golf in the Kingdom," is a Stanford graduate, as is golf team alumus John Norville, screenwriter of the golf movie "Tin Cup". As a result of these and other works and contributions from its scholar athletes, Stanford University is known worldwide as one of Golf's most significant resources.

The Stanford Golf Course has hosted seven national championship tournaments: men's or women's national collegiate championships in 1946, 1960, 1966, 1981, 1982, and 1989, and the U.S.G.A. Boys' Junior Championships in 1959; and it annually hosts men's and women's collegiate tournaments, scratch amateur, and junior championships.

C. The Golf Course is a recreational resource not only for Stanford, its faculty, staff, and students, but for the Mid-Peninsula golfing community.

Though it is a course of national championship caliber, the Stanford Golf Course is playable, and enjoyable, for all levels of players--from beginners, to veteran duffers, to accomplished players.

The Golf Course annually provides recreation and competition to 70,000 or more of Stanford's students, faculty, staff, alumni, friends, and the public. In the calendar year 1999 there were 41,333 rounds, of which 38 were by faculty,

staff, and students, 32 percent by private club members, and 30 percent by the public, including 4,463 charitable fundraising tournament rounds. (See Economics Research Associates study, August 4, 2000, appended hereto as Exhibit 8; also on the topic of charity tournaments, see public hearing testimony of Geri Plunkett to the Santa Clara County Planning Commission, August 3, 2000.)

Stanford's commitment to youth golf is longstanding and ongoing: its men's and women's golf coaches annually host six weeks of youth golf summer camps at the Golf Course; and it annually hosts United States Golf Association regional and other junior tournaments.

Additionally, the Golf Course and Stanford Men's Golf Coach Wally Goodwin have been strong and valuable supporters and resources for the East Palo Alto Junior Golf Program. (Public hearing testimony by Bob Hoover to Santa Clara County Planning Commission, August 3, 2000.)

The Stanford Golf Course is known throughout the world of golf, and is a resource and source of pride to the greater Mid-Peninsula golfing community--even to those who only rarely use it--just as Stanford's Memorial Church and similar landmarks are community assets to those who may barely know of their existence. (See article, "Our Town: Save Hole #1, Please," by Mark Igler, Palo Alto Weekly, July 26, 2000, copy appended hereto as Exhibit 9.)

84-4 III. THE GOLF COURSE SUCCEEDS AS A NATURE SANCTUARY.

George Thomas' vision of the Stanford Golf Course as a nature sanctuary was there from the beginning. His insistence upon incorporating San Francisquito Creek into the field of play not only made for interesting shots and a scenic walk, it buffered the creek and its riparian forest from residential development. Thomas' great care to avoid cutting the groves of great oak trees on the property resulted in a thriving population of squirrels, which in turn create ground burrows that provide estivation habitat for the endangered California Tiger Salamander. Several species of raptors come calling on the squirrels. The San Francisquito Creek is the home of the endangered red-legged frog and the threatened steelhead trout.

(See: Letter of Michael Josselyn, August 2, 2000, appended hereto as Exhibit 10; and Special Status Species Habitat Assessment of the Stanford Golf Course," Wetlands Research Associates, a copy of which is appended hereto as Exhibit 11; and "A Plea to Preserve the Existing Stanford University Golf Course

Lands in Open Space to Ensure Biodiversity for the Region," by Fred Templin and Dr. David E. Wilkins, appended hereto, with attachments, as Exhibit 12.)

Wetlands Research confirmed that California Tiger Salamanders live on the Golf Course to the north of West Campus Drive. The great heritage oak forests in the vicinity of Hole No. 7 and between Holes 5, 6, and 7, together with the oak and grassland savannah between Holes 2 and 5, provide suitable habitat for the California Tiger Salamander, because of the Golf Course's proximity to Lake Lagunita and a plethora of ground burrows in those areas. The Golf Course may be a particularly suitable CTS habitat, Wetlands Research suggests, because the seasonal drainage ditch which feeds Lagunita runs through holes Nos. 7, 6, and 1, and connects to Lagunita by way of a culvert under West Campus Drive, providing a protected migration corridor for CTS. For these reasons, it appears that the first seven holes of the Golf Course provide estivation habitat superior to that found in the southern portion of the CTS Management Zone lying south of Junipero Serra; and in any event, superior to any of the CTS Management Zone Expansion Area proposed by the DEIR. (See DEIR, Figure 4.8-4; letters of Michael Josselyn and Wetlands Research, supra.)

Wetlands Research also found the endangered red-legged frog to be a likely resident of the Golf Course, together with several identified species of threatened or special concern raptors and other birds. "The high density of special status species found on the Golf Course demonstrates the important values of the course as wildlife habitat," Wetlands Research found.

The Golf Course's ecosystem is delicate, such that the movement of a single hole, and its consequent replacement within the envelope of the course--as proposed by Stanford in the GUP--would wreck havoc on both the golf values and the natural habitat of the course. Specifically, the great stand of heritage oaks between holes 5, 6, and 7 would be the likely victim of any rerouting plan on the first seven holes. (See letter of Tad Buchanan to the Palo Alto City Council, July 26, 2000, appended hereto as Exhibit 13.)

84-5 IV.

NOTWITHSTANDING THE GREAT VALUE OF THE GOLF COURSE AND OF THE GOLF PROGRAM THAT IT HAS FOSTERED, STANFORD UNIVERSITY WANTS TO TAKE THE GOLF COURSE FOR HOUSING; ITS SPOKESMEN SAY THAT THE UNIVERSITY HAS RUN OUT OF LAND TO BUILD FACULTY HOUSING ANYWHERE ELSE; HOWEVER, THIS DOES NOT MEET THE COMMON SENSE TEST; MOREOVER, THE UNIVERSITY'S REPRESENTATIVES HAVE MISLED THE GOLF COMMUNITY IN THE PAST.

One might think that, given the classic pedigree of the Golf Course, its great beauty and world acclaim, the prominence of its golfers, and its great value as an environmental sanctuary, that Stanford University would take pride in, and guard the Golf Course as one of the University's great assets and treasures.

But this is not so. The University wants to turn the Golf Course into housing. Why?

Through its spokesman Larry Horton and its Athletic Director Ted Leland, the University has explained that the University is being forced by a faculty housing crisis to build housing on the Golf Course. The University lacks suitable land on the main campus, they say, and the University cannot find 15 acres of land for faculty housing anywhere but on the Golf Course. (See Articles, San Jose Mercury-News, July 13, 2000, p. 1, and San Francisco Chronicle, July 19, 2000, p. A 15, copies of which are appended hereto as Exhibits 13 and 14.)

However, Stanford has had faculty housing crises for a long time. A 1979 Stanford Subcommittee on Faculty and Staff Housing sounded alarm about "the soaring cost of housing in Northern California, which has created a housing problem that we believe have a potentially serious impact on the academic program of the University." If affordable faculty housing is truly the emergency problem which the University now claims as the basis for going after its Open Space, then why did the University between 1995-1997 develop a three-acre lot on Santa Ynez Street in Faculty Hill into only eight building lots which it long-term leased at prices in the \$400,000.00 to \$500,000.00 range apiece, rather than develop higher-density junior faculty-available housing in the density range of the popular Peter Coutts development, which would have netted in the range of 25 housing units?

And why, if faculty housing is an emergency which would justify the dismemberment of the Golf Course, is Stanford University now in the process of developing 628 units of marketrate, available-to-the-public, rental housing at the Stanford

West Apartments and 328 units of market-rate, available-to-the-public housing at the Stanford Senior Housing development, both of which are located on Sand Hill Road, west of the Stanford Shopping Center? Should not these units be used to relieve any faculty housing emergency? Alternately, why did Stanford choose to build commercial rental properties if the faculty housing threat is such as to threaten the University's viability?

The University's spokesmen have not in the past been candid with the golf community about the University's development intentions at the Golf Course. Through at least March, 2000, Stanford Golf Club representatives, via Stanford's Golf Advisory Committee, were told by University representatives that the Golf Course, and specifically the first hole of the Golf Course, was not in danger of development. (See correspondence of Bill Kirk to Joe Simitian, August 3, 2000, and Remarks of Roger Smith to the Santa Clara County Planning Commission, August 3, 2000, copies of which are appended hereto as Exhibits 16 and 17, respectively; Smith presented the Planning Commissioners with petitions containing 553 signatures.)

Athletic Director Ted Leland attended a Stanford Men's Club annual meeting in or about October, 1999, but when questions were asked about the University's housing intentions at the Golf Course, Mr. Leland did not tell the gathering of the University's plans to build housing on Hole No. 1. "That's a legitimate criticism of me, personally," Leland told the San Jose Mercury News, as reported in a July 13, 2000 front page story.

Neither did the University tell new members of the Golf Club, as they joined, at with a very substantial entry fee, over the past 12 months, about the University's plans to cut up the Golf Course for housing. (See Letter, August 3, 2000, to Gerhard Casper and others, from Rex S. Jackson, Shirley Merrill, David Obershaw, and Lynn and Olivier Pieron, a copy of which is appended hereto as Exhibit 18.) Bill Kirk attributes the University's lack of candor, gently, to "a degree of subterfuge on the University's part..." (See Exhibit 16, above.)

So the University has something of a credibility problem with regard to its land use planning, at least insofar as it affects the Golf Course.

V. IN FACT, THERE IS PLENTY OF LAND
IN THE CAMPUS' INFILL SITES,
WHERE STANFORD CAN BUILD MORE THAN ENOUGH HOUSING.

By application of good planning principles--precisely the sort of "compact urban development" planning principles espoused, but not followed, by Stanford in its Draft Community Plan, the University can easily meet the reasonable housing needs of its students and faculty. There would be no need for the University to build on its Golf Course or other great Open Spaces.

In a separate Memorandum, incorporated herein and appended hereto as Exhibit 19, the Committee's land use planning consultant Hart-Howerton Planners, Architects, and Landscape Architects, has analyzed a handful of the University's most obvious infill lots, and found more than enough building space to meet the University's housing needs. Briefly stated, this is done by building up, not out, clustering development, and building multilevel parking garages and dormitories.

Hart-Howerton also found that the University has passed-up many opportunities to provide faculty-student housing, in favor of developing commercial property and market-rate openmarket housing on the University's lands.

84-6 VI. THE DRAFT ENVIRONMENTAL IMPACT STATEMENT IS DEFICIENT, FOR FAILURE TO POINT-OUT PLAN INCONSISTENCIES, AND FAILURE TO CONSIDER RELEVANT FACTS.

PLAN INCONSISTENCIES

CEQA guidelines require that the EIR discuss inconsistencies between proposed development projects and applicable general plans and regional plans, and to inform the lead agency of inconsistencies. (CEQA Guidelines, Section 15125[d]).

The Draft EIR finds that Stanford's proposals "would not result in an inconsistency with a proposed County plan or policy." (EIR, p. 3-1.) The Committee disagrees. The Stanford Draft Community Plan is internally inconsistent, and/or the Draft Community Plan and GUP are inconsistent with the existing Santa Clara County, Palo Alto, and/or Menlo Park plans, which inconsistencies are not commented upon by the DEIR. Accordingly, the DEIR is inadequate in the following particulars:

1. Policy R-LU 67. (DEIR, p. 3-2.) The Santa Clara County General Plan requires that requests to add or delete lands

from the "University Lands-Campus" land use designation shall be processed in accordance with General Plan amendment procedures.

Stanford's Draft Community Plan would remove the lands comprising the Stanford Golf Course from their current Open Space designation, and would recharacterize these lands as "Academic Campus". (Compare DEIR Figures 4.1-3 and 4.2-4) The DEIR drafters find no inconsistency with the General Plan, because "these lands are already used for academic support services consisting of... the golf course." However, the Golf Course has always in the past served the same athletic function that it does now, and it has always in the past been characterized as Open Space, in recognition of its complex personality and simultaneous functions as nature preserve/open space/athletic facility.

In making their finding of no plan inconsistency, the DEIR drafters acknowledge only one of the golf course's three uses--student/faculty recreation, while ignoring the nature preserve and open space functions, which have been key components of the golf course from the time of its construction in 1929. The Committee submits that Open Space better describes the Golf Course's historic--and best future--function.

2. Policy R-LU 68. (DEIR p. 3-3.) "On Stanford University lands, the Academic Reserve and Open Space designation is applied to lands outside of the campus area that currently have an Open Space character or use, or a low intensity use. These lands are important for their scenic beauty, visual relief, grazing, and wildlife values, as well as their academic potential." The DEIR drafter raises no objection to the reclassification of the golf course from Open Space to Academic Campus because "housing development proposed for the golf course... is in support of academic uses." However, as discussed above, this begs the question: the current character and use of the Golf Course lands is Open Space, and the current golf course uses -- "... low-intensity use... scenic beauty, visual relief,... and wildlife values" -- more nearly describe the Golf Course than the definition of "Academic Campus," which is mostly about buildings.

If Stanford University can obtain a change in land use from Open Space to Academic Campus for the Golf Course merely by requesting it, without any showing of genuine necessity--or upon the same showing that it is now attempting to make that it has completely run out of land on its core campus on which to build housing (a showing refuted in the Comment of Hall-Howerton submitted concurrently with this Response), then Stanford's developers will be able at any time to go after its remaining open spaces upon the same minimal showing. This would be bad precedent for Stanford's Open Space lands.

- 3. Policy U-ST 5. (DEIR, p. 3-4.) This County policy requires that when reviewing significant proposed future changes in the University's land use designations, the County shall assess the impacts of the proposed changes on (a) the natural environment, and (b) adjacent jurisdictions, and shall require appropriate mitigation where necessary. The DEIR is inconsistent with this County policy, with respect to Stanford's requested land use change of golf course lands from Open Space to Academic Campus, both in the West Campus and the Lathrop Development Districts. The changes are significant, because they would enable Stanford, on the basis of ad-hoc permits, to bring construction and development to the environmentally-sensitive golf course lands. Although residential development is not incompatible in close proximity to golf courses (witness the ubiquitous housing tracts surrounding golf course fairway developments), this must be done very sensitively on the Stanford Golf Course, because of its unusually high natural habitat values; in any event, golf and residential construction are obviously incompatible uses on the very same parcel of ground, as proposed by the GUP.
- 4. Stanford Community Plan(SCP)-GD 4. "When reviewing any significant proposed future changes in (a) the designations on the Land Use Map of the County's General Plan pertaining to Stanford's lands, (b) the academic growth boundary, or (c) the General Use Permit, the County shall assess the impacts of the proposed changes on the environment and adjacent jurisdictions, and shall require appropriate mitigation where necessary."

The DEIR makes no such analysis of Stanford's proposal to change the land use designation of the Golf Course from Open Space to Academic Campus; there is no serious analysis of the environmental effects of the land use designation change, nor of the effects on adjacent jurisdictions. The EIR is deficient for this reason. For starters, the removal of Open Space protection on the Golf Course will make it very tempting for the University to chew away at pieces of the course. If, for example, the University were to start building housing in the lots adjacent to the 13th fairway, or on the 12th and 13th fairways themselves (the University having already shown its boldness in designing housing for the middles of fairways), this would presumably cause concern among the residential neighbors in that section of San Mateo County, not to mention concern by Alpine Avenue motorists who would have to deal with the prospect of increased traffic to go along with the further increased traffic soon to come to that already-overburdened corner by way of the new Hewlett Center which will soon be going in to the Buck Estate.

5. SCP-GD 12. "The academic growth boundary should not include: (a) important natural resource areas...(d) land

supply in excess of that needed for projected campus growth."
The DEIR is inadequate for not pointing out this inconsistency.
The Golf Course, because of its triple function of habitat
conservation, open space, and recreational/athletic facility,
contains important natural resource areas--a mile and one-half of
San Francisquito Creek and its riparian forest, heritage oak
woods, and habitat for endangered species. Moreover, as analyzed
elsewhere in this Reply and its supporting statements, the Golf
Course lands are excess of the land reasonably needed for
projected campus growth--even if that growth is at Stanford's

extravagant rate of 2 Million square feet of academic and administrative construction and 2000 residential units.

- 6. SCP-GD(i)2. "Support and encourage use of core campus infill sites for development of new housing and academic and related facilities." Stanford's proposed Draft Community Plan and GUP are precisely contradictory to this important principal of infill development and compact urban growth. As analyzed elsewhere in these paper, Stanford has overlooked its logical infill development sites, and the DEIR has neglected to thoroughly analyze the infill sites.
- 7. SCP-GD(i)4. "Emphasize development within the core campus, allowing Open Space and Academic Reserve lands to continue as open space." Stanford's Draft General Plan and GUP clearly defy this principal of compact urban development also. The Golf Course is currently Open Space. It should be left as Open Space so long as there is available acreage in the core campus on which to build. The DEIR drafters need to go back and reanalyze the infill lots and compact urban development strategies as proposed by the Committee's planning consultant Hart-Howerton, and as most certainly will be proposed by others in the EIR review process.
- 8. SCP-LU(i)(2). "Continue communications with 84 -8 community leaders and citizens regarding land use planning efforts in the context of Stanford University's program objectives and their relation to surrounding communities, and vice versa." Stanford failed to comply with this implementation recommendation in its own Community Plan, in connection with Stanford's golf community. (See Section IV, above, and Bill Kirk letter and Roger Smith remarks, exhibits 12 and 13, respectively.) Throughout the past 18 months, while the University's community relations staff have been holding neighborhood meetings in Palo Alto and surrounding communities to promote the University's development plans, the same University representatives failed to meet with or truthfully tell the golf community about the University's housing development plans at the Golf Course. At this point, the Committee to Save the Stanford

Golf Course has managed to submit these comments on the DEIR; however, we got started with this process very late; and based upon the University's less-than-forthcoming treatment, we may request additional time to submit relevant DEIR Response comments.

- Land Use Strategy #3. "Respond to Changing Social and Environmental Conditions.... Within the regional context, the provision of housing and transportation, and the conservation of natural and heritage resources need to be coordinated with overall planning issues and not limited to jurisdictional boundaries. Stanford's planning and that of the six jurisdictions having authority over Stanford's lands should be coordinated." It would be inconsistent with this "Strategy" element of Stanford's own Draft Community Plan for Stanford and the County of Santa Clara, acting without coordinated input from the other governmental jurisdictions affected by the Golf Course, to remove the Golf Course from Open Space and to develop any part of it for housing. The lands of the Stanford Golf Course lie within unincorporated Santa Clara County, Unincorporated San Mateo County, and the City of Menlo Park. The City of Palo Alto also has significant interests in this landmark piece of real estate. Accordingly, procedures deciding the fate of the Golf Course should be coordinated among the jurisdictions.
- 10. SCP-OS 1 "Identify and preserve significant open 84 -9 space in order to maintain the quality and character of the core campus." The DEIR is inadequate for its failure to analyze the significance of the Golf Course as multi-functional Open Space, and to analyze its effects on the "quality and character" of the campus. There were no student interviews, no faculty discussions, no analysis whatsoever on this point; nor was there any consideration given in the EIR to other functions of the Golf Course within the greater Stanford Community: the alumni returning to the campus to visit the golf course, heads of state playing on its world-class acres, money being raised by the University's fundraisers, world-class athletes bringing honor to the University, faculty and students unwinding, a short bike ride away from their daily labors, in the foothills with only their thoughts and golf sticks for company. And so forth. Certainly the Golf Course constitutes "significant" Open Space. What is the effect, then, on the "quality and character of the core campus" of the loss of a world-class, historical asset? The DEIR drafters did not attempt to analyze this, and for this reason the DEIR is inadequate.

- 11. SCP-OS(i)3. "Plan for campus recreational facilities convenient to student residences." This element recognizes the value, in having the golf course near the student dormatories, rather than out west of Highway 280 somewhere, a traffic-choked car ride away from campus.
- 12. SCP-OS(i)6. "Prioritize and utilize core campus infill sites for new development." The DEIR is deficient for failing to more rigorously analyze the campus' infill sites, including, of course, surface parking lots. See Statement of Hart-Howerton, Exhibit 15 hereto.
- 13. SCP-RC 6. "Avoid locating new construction in sensitive habitat areas as defined by the comprehensive conservation and management plan." The DEIR is deficient in its analysis of the ecological sensitivity of the Golf Course Site, not only for California Tiger Salamander, but for red-legged frog and other endangered, threatened, and special status species. (See "Special Status Species Habitat Assessment of the Stanford Golf Course," prepared by Wetlands Research Associates, submitted with this Response.)
- 14. SCP-RC(1) 10. "Continue programs that aim to reduce non-native invasive species." The EIR is deficient for its failure to analyze the potential for development in the eucalyptus blocks in the northern areas of the main campus, and concurrent removal of substantial numbers of that non-native, invasive species, and selected housing development in the thuscleared spaces.
- 15. SCP-RE(i)22. "Develop landscape design guidelines that promote protection of heritage sites and trees." The DEIR is defective for failing to analyze the effect of residential development in the Golf Course on the heritage resource which is the Golf Course, and on the heritage valley and riparian oak groves contained in the Golf Course.
- Adverse Impacts on Heritage Resources. Stanford has been recognized as a leader in historic preservation.... The General Plan recognizes the importance of preserving heritage resources.... The challenge for the future is to create incentives for preservation and to work together to minimize obstacles to the successful rehabilitation of important heritage sites." The DEIR is deficient for failing to analyze the heritage of the Stanford Golf Course, and the effects on that heritage of residential development in the middle of the First Fairway.

- 17. SCP-RC18. "The scenic and aesthetic qualities of the natural setting of Stanford lands in the County should be protected." The DEIR is deficient for failing to point-out the inconsistency of Stanford's Golf Course development plans with the good planning principles enunciated elsewhere in the Community Plan.
- 18. SCP-RC(i) 27. "Emphasize development in the core campus, allowing Open Space and Academic Reserve lands to continue as open space." Again, the nice language of Stanford's Draft Community Plan is internally inconsistent with Stanford's action on the other hand in seeking to remove the Golf Course from Open Space. The DEIR is inadequate in its failure to point out this inconsistency to the lead agency.
- 19. SCP-RC(i) 28. "Preserve significant historical landscape elements." The DEIR fails to analyze or even comment upon the destruction of a great Stanford historical landscape element that would result from housing construction in the middle of the First Fairway.
- 20. SCP-RC(i) 29. "Maintain elements of the native landscape in Campus Open Space areas." The DEIR is deficient for failing to comment on what should be done, consistent with the Community Plan's emphasis on removing invasive, non-native plants, to the eucalyptus stands which have taken over the northern sections of the main campus. Removal of large areas of these nonnatives, and development of this less-sensitive habitat would be consistent with the native plant-friendly provisos of the Community Plan; this is in sharp contrast to the havoc that the University's planners are ready to visit upon the native heritage oaks and the other sensitive environments of the Golf Course.
- 22. City of Palo Alto Policy L-1 (DEIR, p. 3-7). The DEIR states that the proposed development of housing on the first hole of the Stanford Golf course is consistent with Palo Alto Policy L-1, which restricts urban development on the Stanford Campus to "currently developed lands within the urban service area." The DEIR analysis is not correct: the housing development is inconsistent with this Policy, and the City of Palo Alto City Council at its July 31, 2000 Council meeting, went on record in opposition to Stanford's plans for housing development on the Golf Course.
- 23. City of Menlo Park Policy I-G-8 (DEIR, p. 3-9). This City of Menlo Park ordinance requires that San Francisquito Creek and other wildlife habitat and ecologically fragile areas "shall be maintained an preserved to the maximum extent possible." The DEIR says that Stanford's development plans are

consistent with this City of Menlo Park policy, but at least as it pertains to Stanford's golf course housing plans, housing on the golf course clearly is not consistent with this policy. (See "Special Status Species Habitat Assessment of the Stanford Golf Course," Wetlands Research Associates, August 7, 2000; Letter, August 2, 2000, from Mike Josselyn to County of Santa Clara Planning Commission.)

- 24. City of Menlo Park Policy I-G-13. (DEIR, p. 3-10). The City of Menlo Park supports regional efforts to maintain appropriate open space and conservation lands. The DEIR says that the Stanford CP/GUP are consistent with this, but with respect to the Golf Course, this is not so. Stanford's attempt to remove the 175-acre Golf Course from Open Space and to develop housing on it is clearly inconsistent with Menlo Park Policy I-G-13.
- 25. City of Menlo Park Policy I-I-5. (DEIR, p. 3-10). Policy I-I-5 states the policy of the City of Menlo Park to oppose any development proposals along the Sand Hill Road corridor unless the City Council makes findings that the benefits of such proposals outweigh all of the impacts to the City of Menlo Park. The DEIR says that Stanford's CP/GUP is consistent with this policy of the City of Menlo Park. However, without having seen that City's comments on the DEIR, it is hard to imagine that City will think that housing on the Golf Course will be beneficial to the City of Menlo Park.
- 26. LU-1. The DEIR inadequately analyzes the effects 84 -10 of the proposed medium-density residential development on Hole No. 1 of the Golf Course, as an incompatible land use with the adjoining horse stables. The horse stables are the source of noises, smells, insects, and other effects of horse stables; a high-density residential development, with its noises, lights, domestic animals, and small children, would by the same token, be expected to interfere with the animals' peace of mind. would inevitably be brought into conflict if the high-density residential subdivision were installed adjacent to the stables. This is not analyzed at all in the EIR, which states without any analysis that "proposed housing development would not conflict with or divide existing land uses in the vicinity." (P. 4.1-17) Moreover, the proposed housing development obviously conflicts with the current golf use, and this conflict was not analyzed by the DEIR. There was no analysis in the DEIR of the relative difficulty and expense of redesigning the Golf Course to accommodate the "relocation" of Hole. No. 1, with the relative cost and ease of finding an infill housing site for the proposed Hole. #1 housing.

84-11 27. HA-1. Section 4.9 of the DEIR is defective in its total failure to discuss the Golf Course as an Historic Resource. The Golf Course meets three of the four CEQA criteria for an historically significant resource, which defines a significant historical resource as one which meets the criteria of the California Register of Historical Resources, ir included in a local register of historic resources, or is determined by the lead agency to be historically significant. A significant impact is characterized as a "substantial adverse change in the significance of a historical resource."

To be determined eligible for the California Register of Historical Resources, a property must be significant at the local, state, or national level under one or more of the following four criteria, modeled on the National Register 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 associates 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 possessed high artistic values;
- 4. It has yielded, or may be likely to yield, information important to the prehistory of history of the state and the nation."

The Stanford Golf Course meets two, and arguably three, of the CEQA criteria. It is the final "work of an important creative individual (George Thomas), or possesses high artistic values; both of these things are true about the Stanford course. Moreover, it is "associated with the lives of persons important to the nation or to California's past—the great golfers who have come through Stanford since the golf course opened in 1930 (United States and British Amateur Champion Lawson Little was on the original golf team in 1930) up through the present time (Woods, Begay, Martin, each making news in their own ways), and in the meantime Watson, Wright, and others. Not to mention the authors, etc., etc., as set forth in this Reply, above. Stanford is a very important golf resource to the world and national golf communities.

- 84-12 28. DEIR did not adequately analyze the effects of damage or destruction to the Golf Course on public recreation. The effects of Stanford's plans would be:
 - (a) In the event the first seven holes of the Golf Course were lost, this would have significant negative impact upon the availability of golf recreation in the Mid-Peninsula area. See ERA Study, "Analysis of Annual Rounds at the Stanford Golf Course,..." August 4, 2000, appended to this brief as Exhibit 7. Eighteen-hole rounds would be cut to 9-hole rounds, effectively reducing Stanford's annual 70,000-plus rounds in half, or less than half. The 35,000 or so annual rounds would then have to be absorbed by surrounding public courses, which are already among the most heavily-played golf courses in the nation. (Id.)
 - (b) In the event the first hole were replaced somewhere else on the course, and the balance of the first seven holes remodeled to fit it in, the historic and championship quality, and the highest-caliber design values of the course would be very severely compromised, affecting the quality of the facility.
 - (c) In the event the driving range were lost, there would be uncompensated loss of that public recreational facility.

The EIR recognizes the loss of golf recreational opportunity, but says that it will be mitigated by relocation of the driving range and Hole No. 1. (EIR, p. 4.2-21) However, it does not discuss the loss of quality and loss of historical and artistic values that would result from such relocation.

29. The DEIR inadequately analyzes the effect of the loss of Hole No. 1, because the EIR does not contain an analysis of the environmental effects of replacing the hole elsewhere on the course. The DEIR says about this only the following: "Some of these recreational opportunities will be replaced by relocation of facilities. The proposed sites for relocation of the driving range and hole number one of the golf course are shown in Chapter 7, Alternatives in Figure 7-3. Relocation of these facilities would result in the loss of undeveloped lands east of Sand Hill Road, and could reduce the potential habitat values of these areas (see Section 4.8)."

Figure 7-3, captioned "Proposed Golf Course Relocation Sites," is found at page 7-51, but is only conceptual in nature, showing only a general area that has been "proposed" for the "Relocation Site for Hole #1 and Driving Range". This area is a fat-Capital L-shaped parcel, running in a north/south direction along Sand Hill Road, to the north of Hole No. 3 green and across

the street from the Oak Creek Apartments; this "L" corners at approximately the eucalyptus grove behind the third green, then contains the old dressage field to the right of the current Hole No. 2 of the Golf Course. There is no explanation, textual or in map or diagram form, of where the driving range would go, and where the replacement first hole would go. Without this explanation, it is not possible to accurately evaluate the environmental impacts of the relocation of Hole No. 1. Would a new replacement hole be located anywhere within the envelope of current Holes 2 through 7? If so, where would the new hole go, and how would it be engineered, and would it disturb any Tiger Salamander estivation burrows, and would it disturb any heritage trees? What other effects would the relocation of Hole No. 1 have on any of the other holes; would they, or any of them, need to be moved to make room to squeeze in one more hole in the area currently occupied by Holes 2-7? The EIR is silent on this, and perhaps unavoidably so, if the University has produced no architecturally-rendered construction plan for the hole replacement. Accordingly, the DEIR is inadequate.

- 30. And what about the relocation site for the Driving Range? Again, the map at Figure 7-3 is conceptual only. are no engineers' drawings of the driving range, so the environmental impact cannot be measured. Will the site be alongside Sand Hill Road, across the street from the Oak Creek Apartments? Or in the dressage field adjacent to Hole No. 2? If on Sand Hill, what will be the effects on neighbors and driversby of night lights, parking lots, clubhouses, protective netting sticking 100 or more feet high, strung on tall pilings? What will be the safety effects on passing traffic? If the Driving Range is to go into the dressage lot, the questions are similar: what will be the effects of lights, parking lots, etc., etc., on Sand Hill Road motorists and any residential neighbors that eventually come to this corner of Stanford? The DEIR is deficient for its failure to measure these impacts of the housing-on-the-current driving range plan.
- 84-14

 31. Similarly, the DEIR contains no analysis of the environmental effects of Alternative Component HOUS-B (DEIR, p. 7-45), which would develop the entire first seven holes into housing and/or related Academic Campus uses, and move the holes to the west of the Back Nine. (See Figure 7-3, Proposed Golf Course Relocation Sites.) Again, the map is merely conceptual: there are no engineering drawings, not even a routing plan. We are told that the University's golf architect visited the area of the Holes 1-7 Replacement Site, and said that golf course could not reasonably be fit into the area. This is completely apart from the question of what special plant and

animal species may or may not live in that neighborhood. Once again, the DEIR is inadequate for this failure to analyze a specific plan.

- 32. And again, the DEIR is inadequate due to the lack of a specific plan for the planned widening of West Campus Drive in the vicinity of the Golf Course. There are no engineering drawings, or even schematics. The DEIR reports that planners are in dispute as to whether they need an extra right-turn lane (presumably meaning that the road would be widened into the present lands of the Golf Course), or an extra left-turn lane (into the Driving Range parking lot). (DEIR, p. 4.4-103.) If widened into the golf course, this would damage Tiger Salamander habitat in the Tiger Salamander Management Zone, and would bring motorists into the line of misfire of Stanford slicers (or left-handed duck-hookers). The DEIR fails to analyze any of this, and for this reason the document is defective.
- 84-15 33. The DEIR is inadequate for its failure to study the loss of California Tiger Salamander habitat, and other special status species habitat in the Hole No. 1 area itself.
 - 34. The DEIR is inadequate for its failure to study the existing California Tiger Salamander habitat in the area of Golf Course Holes 2 through 7, and particularly the heritage oak woodland between holes 5, 6, and 7, and between Hole No. 7 and Junipero Serra, as a mitigation measure for CTS population that will be impacted by any housing or other development in the lands to the east of the tennis courts near the Hole No. 1 green, and at the Driving Range.
- 84-16
 35. The DEIR is inadequate for its failure to study readily-identifiable infill sites as environmentally superior alternatives to housing construction on the Golf Course. A list of potential alternative sites is included in the Report of Hall-Howerton, which accompanies this Reply as Exhibit 16.
- 84-17
 36. The DEIR is inadequate for its failure to study the change in zoning from the current A-1, 20 acre minimum zone in which the Golf Course now sits, to the Academic Campus and Residential-Medium Density land use designation proposed by the University.
- 84-18

 37. The DEIR 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 West Campus Drive, 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?

- 38. The DEIR is inadequate for its failure to study anticipated traffic effects of a housing development located on the outside of West Campus Drive, on West Campus traffic over the next several years, as the Cancer Center and the Stanford West and Stanford Senior Housing projects become full. Will the First Hole residential traffic impede the West Campus Drive commute traffic, or otherwise. And what will be the traffic effects of this development on Sand Hill Road traffic?
- 84-19
 39. The DEIR fails to note that the golf course is entirely outside the Palo Alto Urban Service Area boundary. Therefore, any development planned for the golf course site will not be served by the city, rendering it infeasible and unrealistic. Will Stanford provide these services? The DEIR is defective for failure to analyze this.
- 84-20
 40. Air Resources. The DEIR fails to note the significant positive impact the golf course has on the campus air quality. As prevailing breezes pass over the golf course the air is both cooled and cleaned. Without the golf course in this location, the air quality at least in the southwestern portion of the campus core will be negatively impacted.
- 41. Noise. The DEIR fails to note the significant positive contribution the golf course use and location provides in buffering the campus core and adjacent neighborhoods. Reduction or reconfiguration of the golf course may negatively impact the noise levels in both areas.
- 84-22

 42. Other CEQA Topics. Significant Irreversible Environmental Changes (section 6.2, page 6-1). The Committee agrees with the DEIR statement with regard to the realistic treat to the environment the change in land use from Academic Reserve and Open Space to Academic Campus represents to the Lathrop District. However, the DEIR has mistakenly omitted analysis of this issue, beginning at the Golf Course in the West Campus area. Most of the West Campus area has similar if not identical environmental conditions and faces a similar threat of irreversible environmental damage if developed as proposed in the GUP. Accordingly, the considerations are the same for the Golf Course in the West Campus District as in the Lathrop District.
- 43. Alternatives to the Proposed Project.

 (See Table 7-1, starting on page 7-4.) The DEIR fails to consider an Academic Growth Boundary (AGB) alternative that would leave the existing golf course in place as is. The GUP proposes including the course within the AGB. The No-Project Alternatives

(both Additional Permits and No Additional Permits options) do not protect the golf course as Campus Open Space. The Reduced Project does not change the boundary. The Alternative Components options AGB-A and AGB-B both surrender all or part of the golf course to the Draft Community Plan's proposed designation change to Academic Campus. The DEIR is deficient for failing to consider as an option the prospect of leaving the existing course in its historic location and configuration outside the AGB line.

- 44. The Committee supports the DEIR's finding that the proposal to extend West Campus Drive through the golf course site is unworkable and infeasible and would generates a variety of significant negative impacts.
- 45. Regarding Table 7-2, page 7-14, item 2: Open Space and Visual Resources: OS-2. Will the project result in loss of recognized open space? The Committee agrees with the EIR that implementation of the GUP will produce a "significant" impact or loss. The Committee does not accept the theory that development will still necessarily occur on historic golf course lands but in a reduced level of intensity. At least one option should allow for the prospect of the golf course remaining as is, where is.
- 46. Regarding Table 7-2, page 7-14, item OS-3. Will the project adversely affect recreational opportunities for existing or new campus residents and faculty users?

 Again, the Committee does not accept the DEIR theory that housing will necessarily be developed at "existing recreational sites," i.e., the golf course. The DEIR should consider the option of leaving the historic golf course as is, with residential development designated elsewhere.
- 47. Regarding Table 7-2, page 7-15, item OS-5. Will the project cause an adverse effect on foreground views from one or more private residences or significantly alter public view? The Committee suggests the DEIR fails to consider the negative impact on open space views, the potential loss the golf course represents to the campus proper, the neighborhoods along Sand Hill Road, and to those traveling along Sand Hill Road. The change in land use designation that puts the very existence of the course in its historic location at risk also threatens the surrounding area with the loss of this significant open space asset and view.
- 84-27
 48. Regarding Table 7-2, page 7-17, item PH-3: Will the project increase the demand for housing thereby causing indirect environmental impacts? The Committee submits that the DEIR 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. Even though the GUP speaks to this area for housing it has left its options open with regard to final land use designation. Just as it was anticipated years ago that the golf course would remain a permanent open space, the GUP may permit development of non-residential uses in this area. This potential was not evaluated in the DEIR, which therefore is deficient.

- 49. Regarding Table 7-2, page 7-27, item BIO-1: Will the project cause a loss of individuals or occupied habitat of endangered, threatened, or rare wildlife or plant species? The Committee supports the DEIR findings of a "significant" impact with regard to the CTS and various Rare, Threatened and Endangered Plants by the proposed GUP. The existing golf course represents and provides suitable and successful habitat for these plants and animals. The loss of the golf course represents the likely loss of these species.
- 84-29 50. Regarding Table 7-2, pages 7-29, 30, 31, 32 items BIO-2 to 9, the Committee supports the DEIR findings regarding the negative impacts associated with the golf course change in land use from Open Space to Academic Campus and the potential development such a change represents. This applies to golf lands in both the West Campus and Lathrop Districts. It makes no sense to treat the golf course differently in these districts; the golf course is an integrated whole; to damage it in one district is to damage and lessen the entire organism.
- The DEIR is deficient for failing to analyze the 51, 84 -30 particulars of the residential development being proposed by the University for Hole No. 1. For example, the project description as found in the GUP is 38 acres, to be developed at densities ranging from 8 to 15 per acre; multiplied by 38 acres, this yields 304 to 570 total units. But there is no project description: how many units of 15-per-acre does the university want, and how many at 8 per acre. If the University's lot acreages are correct, and assuming the Hole No. 1 acreage to be 15 acres, then there would be a remaining 23 acres on the parcel designated for medium-density housing in the West Campus District by the GUP. At a development rate of 13 units per acre, which is approximately halfway between the densities of the Peter Coutts complex and the Pierce-Mitchell houses, 304 units could be developed on the parcel without developing the Golf Course. density of 25 per acre were done on the non-golf course acreage in exchange for density credits, or similar consideration, then all 570 units could go onto the non-golf course parcel.
 - 52. The DEIR is deficient for failing to analyze the particulars of the 2 Million square feet of new academic and

academic support construction being sought by the University in the GUP. The GUP fails to specify what it is seeking, and names only a new performance center and a new sports arena as buildings to come under the GUP. Without at a minimum knowing the sizes and footprints of the buildings, and the locations of the development sites, it is difficult to analyze the University's growth request in the context of the housing and other pressures that the University's academic growth demands are placing both on the Stanford community and upon the broader surrounding communities. Stanford should be required to provide this information as part of its GUP Application, and the County should be required to analyze such information as part of the EIR process. Without this information, the Committee submits that the DEIR is inadequate.

- The DEIR is inadequate for failing to consider the environmental impact of requiring Stanford to offer discounts or other inducements to Stanford faculty and staff to take residences in the Stanford West Apartments and the Stanford Senior Housing--new residential development projects that will be coming onto the housing market beginning in September, 2000, as an environmentally superior alternative than the damage and/or destruction of the historic and environmentally sensitive Stanford Golf Course. These resources were neither condered by the DEIR drafter, nor were any reasons given for their nonconsideration. The Committee suggests that there is good reasons to consider these resources, and there is precedent for such consideration, as the Committee understands from our Stanford University sources that the University on an ad hoc basis already gives extra housing "allowances," to professors, and in some cases provides subsidized housing for graduate students and others in apartment houses on Stanford lands. Certain inducements to senior faculty who may be or may feel "housebound" in homes that are now too big for them, may have the effect of freein-up housing stock on Faculty Hill for younger professors. Without some such subsidies, the Committee understands that the rates expected to be changed at Stanford Senior Housing will be out of the price range of most retired Stanford faculty living on Faculty Hill. It may well be that the relative modest expense of some housing subsidies or inducements might offer an environmentally-superior alternative to the destruction or substantial damage to the heritage resource and environmentally-sensitive grounds of the Stanford Golf Course.
 - 54. For the same reasons as discussed above, the DEIR is inadequate for failing to consider the use of subsidies or other inducements for faculty to live in the Oak Creek Apartments, under long-term lease from Stanford to a private developer. At Sectopm 7.7, "Alternatives Considered and Rejected," the DEIR states that it rejected consideration of

"existing housing on Stanford lands for eligible Stanford employess, " because (1) the analysis is limited to on-campus housing; and (2) because "this alternative would not meet the County's objective of augmenting the regional housing supply." Neither reason makes sense as an excuse not to consider the Oak Creek Apartments and other Stanford-owned commercial real estate located off-campus. The failure to consider potential housing opportunities on off-campus Stanford lands violates Stanford's Draft Community Plan, Land Use Strategy #3, which provides as follows: "Strategy #3: Respond to Changing Social and Environmental Conditions.... Within the regional context, the provision of housing and transportation, the enhancement of air and water quality, and the conservation of natural and heritage resources need to be coordinated with overall planning issues and not limited to jurisdictional boundaries. Stanford's planning and that of the six jurisdictions having authority over Stanford's lands should be coordinated." In other words, and as it relates to the instant matter, Stanford must look to all its resources to solve problems of "housing and... the conservation of natural and heritage resources..." That is what we are talking about here: housing and the historic and environmentally sensitive Golf Course. As to the DEIR drafter's excust that the alternative would not meet the County's own objectives, is is not credible to say that the County would object to a Stanford program to subsidize its faculty to live in commercial Stanfordowned rental or other commercial property. In fact, the Committee understands that there are instances of that happening now. It may be that some combination of discrete programs, tailored to specific situations, could have significant impacts on Stanford's housing crisis. If, as Stanford says, this crisis is sufficiently grave to jeopardize its standing among the world's universities, then such programs should be considered as an alternative to destroying heritage and environmentally sensitive assets.

55. The DEIR is inadequate for failing to consider the D.C. Powers Lab, Horse's Head, Rural Lane, Buck Estate, Arguello Site, Sand Hill/SLAC, Guernsey Field, and Woodsdide Parcels sites located in the County of San Mateo, and the Oak Creek Apartments, Stanford West Apartments, and Stanford Senior Housing sites as potential housing sites for Stanford faculty. The stated common reason given for the failure to consider the San Mateo County sites is "because it is not within Santa Clara County; may be considered for future housing." But this agaom is a lame excuse, and in any event is inconsistent with Stanford's own Draft Community Plan. So as a matter of Plan internal consistency, the Stanford properties located in other jurisdictions must be considered. Stanford's Draft Community Plan, Land Use section, speaks precisely to this point, as follows: "Strategy #3: Respond to Changing Social and Environmental Conditions....

Within the regional context, the provision of housing and transportation, the enhancement of air and water quality, and the conservation of natural and heritage resources need to be coordinated with overall planning issues and not limited to jurisdictional boundaries. Stanford's planning and that of the six jurisdictions having authority over Stanford's lands should be coordinated." Precisely. Stanford's own Draft Community Plan provides that the "provision of housing and... the conservation of natural and heritage resources"--which is what we are talking about at the Stanford Golf Course--are matters of sufficient importance and of interjurisdictional common relevance, that they should be discussed in an interjurisdictional forum of some kind. As a matter of logic, and as a matter of internal plan consistency in the Stanford Draft Community Plan, the housing/heritage/resource conservation issues raised by the University's attempt to take its Golf Course out of play, or damage or seriously alter its historic character, must not be allowed to proceed without a much fuller consideration than has been given it in the DEIR.

VII. CONCLUSION:
WHAT WE HAVE HERE
IS A FAILURE TO PLAN WELL.

Compact urban development: who can argue with this principal as a general tenet of good urban planning? Stanford espouses this concept in its Draft Community Plan; however, it fails to put this principal into practice when Stanford makes a move to rezone and cut up the Golf Course. Build up, not out, in the urban core areas, and leave the great open spaces to be enjoyed by all. Such planning, if employed at Stanford University, would spare the historic Golf Course and the Foothill open spaces, while still providing housing in the context of the University's reasonable demands for academic growth.

We have shown, with a few examples from our planning consultant, Hall-Howerton, how this could work. We understand that other EIR comments include substantial alternate site housing elements. Stanford has lots of land, and lots of resources to bring to this issue.

In the future, the University needs to look inward, perhaps toward a redevelopment of the eucalyptus patches on the northern end of Campus.

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And as for the Golf Course, Stanford's legacy from the great naturalist and designer George C. Thomas, Jr., it should be left where it is, as it is: a piece of Stanford history that well serves its functions of open space, recreation, comradeship, environmental haven, and a place to focus and clear the mind.

Respectfully submitted,

COMMITTEE TO SAVE STANFORD GOLF COURSE

chan Varia

Richard H. Harris, Jr.

cc: Archie S. Robinson, Esq.
Lyman Van Slyke

Richard Strock
Richard Stultz
Geri Plunkett
Roger Smith
Betty Koski
Scott McNealy
Sandy Tatum
Tom Keelin

Rich Berra

INDEX TO EXHIBITS

- Memorandum, undated, unsigned,
 Captioned, "DAPER Capital Project Look Ahead 2000-2008"
- Letter to Santa Clara County Planning Commission from Geoff Shackelford, dated August 4, 1000
- 3. Boox excerpts from "The Captain: George C. Thoas Jr. and his Golf Architecture," Sleeping Bear Press, 1996.
- 4. Magazine Article, "By Design: George C. Thomas," Golf Magazine, August, 1998, p. 80.
- Excerpts from Stanford Golf Clippings, 1899-1931,
 George Ratliff, editor, 1996.
- Magazine Article, "Lost in Paradise,"
 Golf World Magains, July 14, 2000, p. 16.
- 7. Magazine Article, "50 Greatest Golfers of All Time," Golf Magazine, July, 2000, p. 106, ff.
- 8. Letter to Santa Clara County Planning Commission from Economics Research Associates, August 4, 2000.
- 9. Opinion Column, "Our Town: Save hole #1, please," Palo Alto Weekly, August 26, 2000.
- 10. Letter, Michael Josselyn, PHd, Wetlands Research Assocs., to Santa Clara County Planning Commission, August 2, 2000.
- 11. Special Status Species Habitat Assessment of the Stanford Golf Course, Palo Alto Santa Clara Co., CA.
- 12. A Plea to Preserve the Existing Stanford University Golf Course Lands in Open Space
 To Ensure Biodiversity for the Region,
 by Fred Templin .
- 13. Letter, July 26, 2000, from Tad Buchanan to Palo Alto City Council.
- 14. News article, "Stanford's Change of Course," San Jose Mercury-News, July 13, 2000, p. 1.
- 15. News article, "Stay the Course," San Francisco Chronicle, July 19, 2000, internet version.

- 16. Letter, Bill Kirk to Joe Simitian, August 3, 2000.
- 17. Planning Commission Oral Presentation Notes, August 3, 2000, Roger Smith.
- 18. Letter, August 3, 2000 to Gerhard Casper, et. al, from Rex Jackson, Shirley Merrill, David Obershaw, Lynn and Olivier Pieron
- 19. Response of Hart Howerton to DEIR, August 7, 2000, on behalf of Committee to Save Stanford Golf Course

DAPER CAPITAL PROJECT LOOK AHEAD 2000 - 2008



Avery Aquatics Center Phase I

Phase I of this project will nearly double the size of the facility. This phase includes the construction of a new 50-meter training pool and a new diving pool with adjacent 10,7,5,3 and 1-meter platform tower. Additionally, new varsity locker rooms and showers will be installed. Completion is scheduled for 3/3/00. Divi ~ 0

Avery Aquatics Phase II

Phase II involves the complete renovation of the existing, remaining pool facilities. This phase includes the rebuilding of the competition pool, installation of a new elevator, ADA pool access fixtures, and process equipment upgrades. Completion scheduled for 10/15/00. [LBUIDING 50 BALLET POST , WELL SCOTE 56470] SHADE GHICTHE!

Cobb Track and Angell Field Phase III - Lighting and Scoreboard The Stanford Track and Field Program has gained considerable recognition as both a competitive power and a competent host for major comnetitions. The new limits are the stanford track and a competent host for major comnetitions.

portable ones currently brought in and will significantly improve Stanford's hosting capability.

Encina Gymnasium Replacement / Renovations 5+ 78A-130

The current building is a URM structure and not suitable for occupancy. Preliminary formulation suggests that the building be demolished and rebuilt. The new DAPER occupants will include sports medicine. recreation, club sports and administration. Formulation is expected to begin during 2000.

3+ years **Encina Tennis Court Expansion / Relocation**

This expansion from 6 courts to 9 is necessary to accommodate the large number of recreation classes and users. This expansion has been identified in previous DAPER Master Plans. Formulation is expected to start in 2000.

Field Hockey Bathrooms, Bleachers and Lights 00 102

The Artificial Turf Field is used by a number of varsity seams, as well as, recreation users. The existing bathrooms are over unilized and in need of repair. The bleachers will replace the portable bleachers that are placed at events and the lights will provide much needed scheduling flexibility. Depending on private gifts this project could start as early as 2000.

Elliot Field Lights (Football Practice Field) FA! (00

This project will install lights on the football practice fields. It will enable our team to practice in preparation for night games and increase the scheduling flexibility. This project will be completed in 2000.



Ray

Golf Course - New 18 Hole Course

?? 5- years

This project involves the development of a new 18 Hole course on Stanford lands outside of the campus core. The primary push behind this project is the University's ongoing need for additional bousing space that will likely dislocate portions of the existing lower course (holes 1-7). The new course will act as Stanford's primary course while the old course will be scaled down to a 9 hole executive course. DAPER anticipates having to relocate the lower nine holes of the golf course within the next 7-10 years.

Golf Course - New Club House / Club House / Cart Barn

5,5

The existing structure that houses these three elements is in need of rebuilding. There is no firm plan in place for this project, but it will be necessary to address this building within the next few years.

Maples Pavilion Expansion / Renovations

Maples Pavilion, which provides a competition venue for Basketball, Volleyball and Gymnastics, is routinely filled to capacity. DAPER is investigating expansion possibilities for the existing 7,400-seat arena, as well as, the option of building a new facility. Ideas for new amenities include a new glass arrium for public areas, new scoreboards, sound system and lighting. The probable start of this project is expected within the next 5-7 years.

Master's Grove Cubhouse

As the number of varsity sports has increased so has the need for additional team locker rooms and meeting space. This project will address the need for this space by building a small clubhouse located in Master's Grove between the Lacrosse, Rugby, Soccer and Softball playing fields. This structure would house between 4 and 6 team locker rooms and may include a meeting room and equipment room. Anticipated start of this project would be in the next 2-4 years.

Redwood City Boathouse

This project renovates the current boat storage and launch facility located in Redwood City. The new twostory boathouse will be approximately 16,000 square feet and contain both the Crew and Sailing Programs; as well as recreational rowing. The development applications have been submitted and construction is anticipated to start in 2000.

Rugby Field. Bleachers and Lights

X

This project will partition a new competition facility for the Rugby Program from the existing South Intramural (IM) Fields Complex. The Intention is to designate a consistent area that can be maintained and used for Rugby competition. When finished this facility will be similar to Maloney Soccer Complex and will include bleachers, lights and fencing. Depending on gift donations this project is anticipated for 2000 – 2001.

DAPER CAPITAL PROJECT LOOK AHEAD 2000 - 2008

Sam Macdonald Plaza / Chuck Taylor Grove / Avery Aquatics Entry

The build out of the Track, Tennis and Aquatics facilities has left the Sam Macdonald Road and adjacent mall areas in need of repair. This project will join these facilities together and unify the landacaping and pathway elements. Completion of this project will be concurrent with the completion of the Aquatics project and will most likely span 2000 – 2001.

Serra/ECR Corner Fields

DAPER is experiencing an ever-increasing demand for playing field space. In order to fulfill the needs of the University. This project will add fields in the unused area adjacent to the South IM Field Complex. This project will also incorporate the University's need for this area as a retention basin for storm drainage. Anticipated project start in 2001.

150 per64 5,0000001

Softball Seating and Lights Please Box.

Phase I of this project included the new field, backstop, dugous and scoreboard for the softball program.

Phase II will complete the DAPER Master plan elements of scating and landscaping for this area. Plans are currently being developed and construction will start in 2000.

Stanford Stadium Lighting

Fox TV will sponsor the installation of broadcast quality lights in Stanford Stadium. The application to the Santa Clara County has been submitted and the intention is to have the lights installed prior to the 2000 Football Season.

12 Poles - Musco U William

Stanford Stadium Upgrades

Major renovations to the Stanford Stadium are planned by the year 2007. This project will address the basic functionality of the facility and compliance with the ADA, while increasing structural integrity. DAPER has taken an aggressive, pro-active position on accessibility issues for all of its facilities, which may result in an accelerated date of completion.

DAPER CAPITAL PROJECT LOOK AREAD 2000 - 2008

Sunken Diamond ADA Seating and Remodel

DAPER has taken a proactive approach to remove accessibility barriers at our facilities. As part of this program we have redesigned the Sunken Diamond seating areas to include wheel chair positions in both the stands and the press box. The new folding seats will replace the existing bleacher style seats and the upper walkway and press box will be accessed by a new ramp. Additional improvements include expanded accessible lawn seating, remodeled dugouts and a new backstop. Anticipated start of this project will be August 2000.

Sunken Diamond Club House Expansion

This project was part of the original plan of improvements to Sunken Diamond. This project involves improvements to the players' locker room, wash room and lounge areas and will improve the VIP scating overlooking right field. DAPER anticipates completing this project by 2002.

02

Tabbe Tennis Practice Lights and Bleachers

To better serve the Stanford Community, DAPER will be illuminating the eight courts adjacent to the Taube Tennis Stadium. These courts will be available for rec. use in conjunction with the West Campus Tennis Courts. Additionally, a small bank of bleachers will also be added. These bleacher seats will provide a small number of spectator seats for courts 4 - 11. Anticipated completion of this project will be in 2000 - 2001.

Ticket Office Facility

The current Gate 2 Ticket Office located at the Stanford Studium is too small to process and distribute the large quantity of tickets for Athletic Events. DAPER anticipates improving our ticketing facilities within the next 10 years.

DAPER CAPITAL PROJECT LOOK AHEAD 2000 - 2008

Varsity Driving Range Improvements / Relocation

Camently DAPER is making minor modifications to the Varsity Driving Range Green and Hitting Areas. It is, however, anticipated that as the University continues to expand it housing that the both the Varsity and Public Driving Ranges will need to be relocated.

MADIES

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- MOD FOCK CLUMBURS

WENT

Geoff D. Shackelford

August 4, 2000

Santa Clara County
Planning Commission and Board of Supervisors,
Attn: C. Joe Simitian
70 West Hedding St.
San Jose, Ca. 95110

Re: History of the Stanford Golf Course, Palo Alto, CA. EIR Comment, Stanford University Draft CP/GUP Application

Dear Planning Commission and Supervisors:

At the request of the "Committee to Save the Stanford Golf Course," I am writing to put the historic significance of the Stanford Golf Course into perspective and to share my knowledge of this 1929 layout by master golf architect, George C. Thomas Jr.

I am an avid student of golf architecture, and have authored six books on the subject, including a biography of George C. Thomas Jr., The Captain, George C. Thomas Jr. and his Golf Architecture, (Sleeping Bear Press, 1997). I am also the golf architecture columnist for Golf Magazine, a monthly publication with the highest circulation among golf magazines, and for the Internet golf publication, golf.com. Hopefully I can shed some light for you on the prominence of Captain Thomas in architectural circles and the significance of his final design, Stanford Golf Course.

Golf architecture is a sub-field of landscape architecture and land planning, first recognized as a profession around the turn of the Twentieth Century. But not until 1911 when The National Golf Links of America opened on Long Island, N.Y., did golf architecture become an art form as well. The National was the result of four years of work by C.B. Macdonald, an avid student of master land planner Frederick Law Olmsted and landscape architects Brown, Repton and Puckler.

Humphrey Repton, in turn, was the disciple of the late 18th Century English landscape architect Capability Brown, who generally is credited as the father of the "picturesque" school of landscape design. C.B. Macdonald's National was the first course to incorporate the "picturesque" principles of landscape architecture to golf course design, and it marked the beginning of new things to come for the field. Just a few years later a group of Philadelphians, including Stanford course architect George Thomas, began practicing course design with these principles in mind, creating "natural" looking landscapes that merged often imperceptibly with the surrounding environment.

George Thomas was one of the greatest golf designers of America's "Golden Age" of course design, consistently considered along with five other architects as being the acknowledged great masters of early 20th Century American golf architecture. He learned and evolved as an architect in Philadelphia around the turn of the 20th Century, his mentors including noted masters such as A.W. Tillinghast and Donald Ross. He was a founder of and was instrumental in the design of Pine Valley Golf Club, located in a New Jersey suburb of Philadelphia, consistently ranked the finest and most complete example of golf architecture in America. Stanford was one of thirteen original 18-hole designs by George Thomas, beginning in 1904 with his earliest effort, the Marion Golf Club, Marion, MA.

Eight of Thomas' courses, including Stanford, were in collaboration with noted California engineer Billy Bell. There is little question that these eight California collaborations with Bell were by far Thomas's strongest efforts architecturally. They were the most natural looking and at times awe-inspiring in appearance, thanks to the combination of Thomas' design and strategic brilliance, and Bell's construction expertise. And these eight designs were certainly the most creative of Thomas's career in their use of design strategy because Captain Thomas was able to focus so much energy on the details of each hole's design.

This is important to note because many key figures in golf consider Thomas the ultimate design "strategist" due to the complex and thrilling option-laden holes he created at courses such as Stanford, and also because his book Golf Architecture in America is widely considered the most important ever published on the subject of golf course design. As I understand it, CEQA guidelines for recognition and protection of "significant historical resources" require, among several things, that the landmark in question "embody 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."

I write to you as a historian, student of architecture and longtime golfer. I can say without hesitation or fear of contradiction, that George Thomas' design at Stanford is one of the most important remaining examples of his work and of the "Golden Age" of course design. It is the work of a man widely considered a master in the creation of lasting, thought-provoking and inspiring course designs.

Another extremely important aspect of Thomas' legacy and stature was his insistence upon the preservation of nearly all key natural features on a site. In this, he was well ahead of his time in environmental sensitivity. Thomas was a naturalist, before naturalists were commonly called "environmentalists." He was a rose breeder, a dog breeder, and a deep sea fisherman who published books about each of these activities. Nowhere did Thomas work more carefully around natural resources than at Stanford Golf Course. The Stanford Daily reports that of the estimated 5,000 oak trees on the virgin 175-acre golf course property when the architects found it, only 75 trees were removed to make way for

the fairways. Thomas and Bell "made every possible effort to save the trees by redesigning the locations." Also, it is reported that Thomas and Bell required Stanford to acquire land from the Buck Estate to the north of San Francisquito Creek, so that the course could play back and forth across the creek. This simultaneously had the effect of making the golfers' shots more interesting and strategically challenging, and of buffering and protecting the San Francisquito riparian corridor. (See Stanford Daily stories dated March 5 and June 29, 1929, collected in "Stanford Golf Clippings, 1899-1931," Gordon Ratliff, 1996.)

Thomas had virtually ended his course design career in the mid-1920s. But the quality of the Stanford site and the university's reputation convinced him otherwise. Ironically, the land acquired north of San Francisquito Creek, at Thomas' request, today constitutes land that the University would not now own, except for the golf architect's vision. In other words, had Thomas not envisioned that the property north of San Francisquito Creek (all or portions of holes Nos. 3, 4, 8, 12, 13, 14, and the old fifth hole tee), would be better suited for a natural sport such as golf instead of structures, that area would not be the beautiful natural resource it is today, nor would Stanford University even own it.

Finally, as a former collegiate golfer and a writer and historian of golf, I must reiterate the significance of George Thomas's design in helping to shape the kinds of players who have come out of Stanford. I feel strongly that ingenious golf architecture helps inspire golfers to reach new levels of ability, and to further their influence in the game of golf. The fact that Tiger Woods, Tom Watson, and Mickey Wright—the greatest woman golfer in history-and countless other champions, including Lawson Little, have played here is no coincidence. By most measures, Watson, Wright, and Woods are three of the dozen greatest players in the history of the sport of golf, and Lawson may be the least recognized great because he followed the illustrious Bobby Jones.

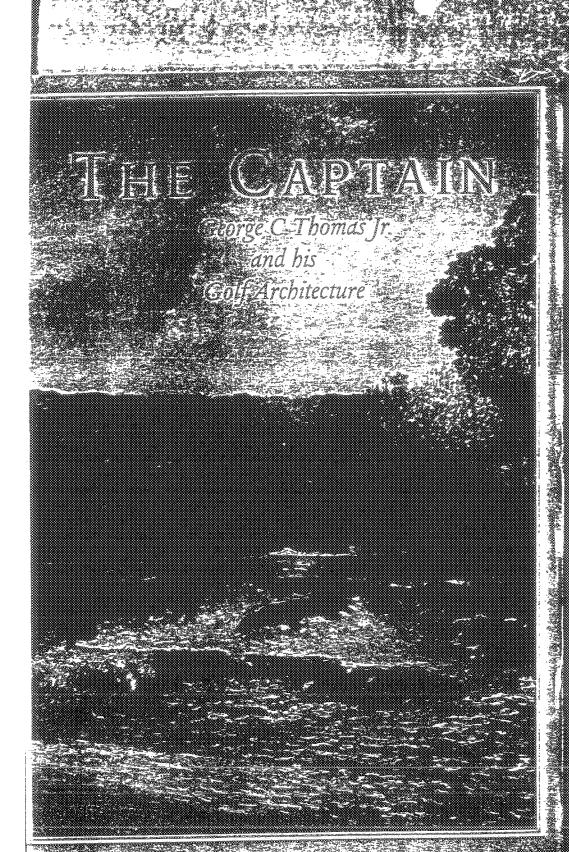
There is not another University or golf course in the world that can claim such an honor roll of talent from among its alumni. For this additional reason--separate from but related to the history and quality of the architecture--the Stanford Golf Course would appear to meet CEQA criteria for significant historical and cultural resources. The Stanford Golf Course is an architectural gem and a golf historical site of worldwide reputation and significance, and it should be preserved.

Sincerely,

Geoff Shackelford

Geoff Shackelfool

Cc: Dr. John Hennessy, President-Elect Stanford University



GEOFE SHACKELFORD FOR ENSHAW

GENERAL GUIDELINES FOR GOLF COURSE DESIGN

BY GEORGE C. THOMAS IR.

(Note: The following seven directives were laid down by Captain Thomas before the construction of Bel-Air. The guidelines appeared in the club newsletter, Bel Air Progress)

1. Each hole should be a thing alone, set off from all others

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- 2. Uneven stances on irregular, canted fairways are essential: far too many American courses offer monotonous lies from dead-flat terrain
- 3. Length means nothing without character, character means proper hazards and hazards should be on a natural and heroic scale for superlative golf; glorified mole-hills are ruled out
- 4. An ideal hole should provide an infinite variety of shots and at times give full advantage for the voluntary pull or slice, one of the most finished strokes in golf
- 5. Bunkers will be sloped so that the ball runs to the middle and not left unplayable under the faces; but such traps must be tight, closely guarding the greens
- 6. One-shot holes of par-3 are most important; here one gets a keener interest off the tee than anywhere else and five one-shotters in 18-holes are not too much
- 7. Greens will have great differences, with rolls, dips and grades demanding judgment with a keen eye

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APPENDIX

THE GOLF COURSES OF GEORGE C. THOMAS JR.

SOLO DESIGNS

Course Location Year Completed				
MARION GOLF CLUBMarion, Massachusetts1904 (circa)	C			
18-holes	С			
SPRING LAKE GOLF CLUBSpring Lake Heights, New Jersey1910				
18-holes	(Base)			
WHITEMARSH VALLEY C.CChestnut Hill, Pennsylvania1908				
18-holes w/Samuel Heebner	В			
RED HILL GOLF CLUBUpland, California1921				
original 9-holes (front nine today)	B.			
Los Angeles Municipal G.CGriffith Park, California				
36-holes (redo of existing Wilson, creation of Harding Course)	2			
SATICOY GOLF AND C.CVentura, California1926				
18-holes (now Saticoy Regional G.C.)				
CO-DESIGNS WITH HERBERT FOWLER	L			
(Thomas supervised Construction, Fowler primarily responsible for the design)				
CourseYear Completed	Sī			
THE LOS ANGELES COUNTRY CLUBLos Angeles, California				
36-holes, complete rebuilding of the existing course				
PINE VALLEY GOLF CLUB				
(Thomas was a founding member) Understudy	C			
(studied under George Crump, H.S. Colt)	C			
Consultant/Visitor 1919-20	P.:			
(helped Colt, Hugh and Alan Wilson, C.H. Alison finish the course)				
Consultant to William Flynn	E.			
(included building of alternate green on ninth, several new tees)				

DESIGNS OF GEORGE C. THOMAS JR. AND BILLY BELL

ompleted	1	(Bell served as Construction Superintendent on these Projects)				
4 (circa)		Course	Location	Year Completed		
	i	Ojai Valley Inn Golf Club	Ojai, California	1925		
1910		18-holes	,			
	!	LA CUMBRE COUNTRY CLUB	Santa Barbara, California	1925		
1908		redo 9-holes, add 9 holes				
		Bel-Air Country Club	Los Angeles, California	1926		
1921	1921 18-holes (Jack Neville, Alphonso Bell also collaborated)					
	1	BALDWIN HILLS GOLF CLUB	Culver City, California	1926		
1923	i	18-holes (name later changed to Fox Hills Golf Course, West Course)				
	•	Fox Hills Golf Course	Culver City, California	1927		
1926		18-holes, East Course				
		THE RIVIERA COUNTRY CLUB	Pacific Palisades, Californ	nia1927		
		18 Holes, 9-hole par-3 course (preliminary design for second 18-holes)				
		Los Angeles Country Club	Los Angeles, California	1928		
		Redesign of North Course, partial redesign of South Course				
		STANFORD GOLF CLUB	Palo Alto, California	1930		
basalqmc	ŧ	18-holes				
1921						
		DESIGNS OF BILLY BELL	. WITH GEORGE THOMAS CO	ONSULTING		
		,	as consulted. This is only a confirmed list 22 and 1932 which Thomas likely made s			
914-15	· · · · · ·	Course	Location	Year Completed		
	į	CASTLEWOOD COUNTRY CLUB	Castlewood, California	1923		
919-20	•	36-holes				
	i	PALOS VERDES GOLF CLUB	Palos Verdes, California	1924		
*030		18-holes				
1928	en medican de receptor de la company de la c	EL CABALLERO GOLF CLUB	San Fernando, California.	1926		
	ï					

George C. Thomas Jr. architect of Riviera-site of this year's Senior Openbuilt courses

as varied as

George C. Thomas Jr. center, with Alister Mackenzie right, and Billy Bell. left. Born: 1873, **Philadelphia** Pennsytvania Died: 1932, **Beverty Hills** California

By Design

George C. Thomas Jr.

OME MODERN golf architects are baffled by the attention and admiration given to the designers of vesterday. They can not understand why golfers keep wanting to play the subtle designs of the 1920s when there are so many aesthetically pleasing courses being constructed today. However, the primary difference between classic and modern architecture—a factor lost on some contemporary architects—lies not in the scenic beauty of a golf course. Instead it is the strategy—the element of the design that makes the golfer think and execute to achieve results—that draws players back to the classic courses. And even with such heralded strategic school peers as Donald Ross, A.W. Tillinghast, and Alister Mackenzie. there was no bigger proponent or strategic golf course design than George C. Thomas Jr.

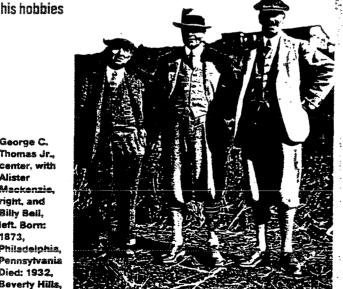
Raised in the wealthy suburbs of Philadelphia, Thomas has said he "grew up in golfing knowledge" with Tillinghast, a fellow Philadelphia

BY GEOFF SHACKELFORD

Cricket Club member. By 1912, his friend Hugh Wilson was constructing the new course for Merion, and George Crump was clearing the sandy hills east of town for Pine Valley where Thomas was a founding member. The link between these men was exceptional playing abilin-all were among the better golfers in the region and each carried a handicap under five.

For Thomas, golf course design was just one of many artistic passions. Having inherited a large sum of money when his parents died, Thomas devoted his energy to several hobbies, most notably roses. He wrote two books on roses and created more than 40 varieties for the commercial market. A former World War I pilot who survived three crashes, Captain Thomas's other interests included deep-sea fishing (on which he wrote a book in 1930) and breeding English Setters (he won Best of Breed at the 1903 Westminster Kennel Club show).

Thomas's array of interests may explain how he created some of the most original, artistic and challenging holes ever built. His career



CLASSIC DESIGNS Riviera CC (#24)

Los Angeles CC, North (#37)

(GOLF MAGAZINE'S Top 100 in the U.S. ranking in parenthe

LESSER KNOWN GEMS

Bel-Air CC (CA)

Whitemarsh Valley CC (PA)

Oiai Valley Inn (CA)

Stanford GC (CA)

STRENGTHS

- Master of strategic design and course routing
- Built some of the most innovative, eccentric and strategic holes ever seen
- Used large, jagged-edged, sand-faced bunkers, particularly on his California designs
- Made creative use of barrances and swales for drainage purposes
- ·Wrote Golf Architecture in America, a definitive book on the subject WEAKNESS
- ·Green contours fairly basic



began in 1905 when the Thomas family sold their estate to a group looking to build a country club in the Chesmut Hill area of Philadelphia. The family stipulated that the then 32-year-old Thomas be allowed to design the new course, and Whitemarsh Valley became the first Thomas design when it opened in 1907.

Following two other small-scale designs in the East. Thomas moved to Beverly Hills in 1920 after his return from the war. Upon his arrival, Thomas joined Los Angeles Country Club, where he was asked to supervise the construction of Herbert Fowler's redesign. Six years later. Thomas would completely renovate the Fowler design to meet his own standards.

From 1924 to 1930 he, along with construction supervisor Billy Bell, would design or redesign several timeless courses in California, including 1998 U.S. Senior Open site Riviera. Los Angeles Country Club (the North Course), and Bel-Air. Not only were all of his designs noted for their stunning lacy-edged and sand-faced bunkering, but Thomas built all of his holes with numerous options for play. He also incorporated hazards unique to the region, including sandy barrancas and deep canyons.

Oddly. Thomas's work was not widely recog-

nized in the early years for its creativity, perhaps because it was so bold that it went over the heads of most club committees who subsequently altered his work. His epic book, Golf Architecture in America, is one of the finest publications ever presented on the subject of golf course design. Not only did Thomas compile a wealth of interesting photography, he also combined it with concise writing and intricate drawings of bold strategic holes.

Though Riviera remains his masterpiece and Los Angeles Country Club's North Course is a sound test. Thomas's original design at Bel-Air may have been his most innovative. Thomas crafted numerous double rairways, challenging short par fours, and one-shotters surrounded by gaping bunkers, traversing four different canyons. The course has gradually been changed in an attempt to create a "championship" test. However, some think a restoration of Thomas's original design would land it in GOLF Magazine's "Top 100 Courses in the World."

Captain Thomas died in 1932 before he could redesign the South Course at Los Angeles Country Club, but he left behind enough of a legacy to make him the ultimate strategist in the eyes of classic architecture buffs.

The course at Ojai Valley Inn in Ojai, California (sixth hole shown above), is a Thomas design.



George
Thomas's
book "Golf
Architecture
in America"
has been
reprinted by
Sleeping Bear
Press. (\$85;
800-4872323 or
www.sleeping
bearpress.com)

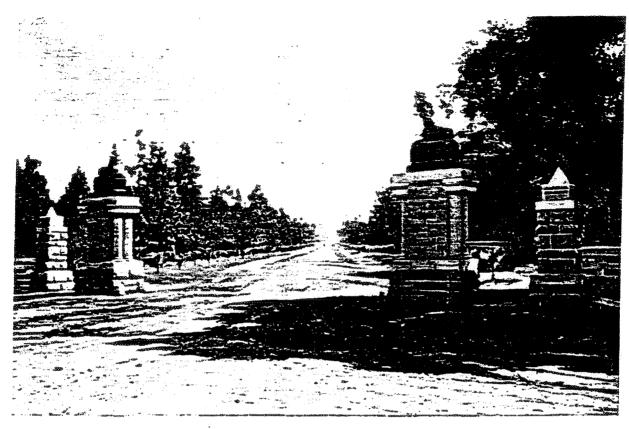


Photo by Thors.

THE APPROACH TO STANFORD UNIVERSITY.

STANFORD GOLF CLIPPINGS 1899 - 1931

Gordon Ratliff Editor March 1996 number of local residents were allowed to use it by paying an annual fee - the number varying somewhat from year to year, but contributing to the local support for and interest in the University."

[Almon Edward "Dutch" Roth ('09, JD '11) graduated from Stanford with a degree in law. He was Stanford's first dean of men under President David Starr Jordan. He was Stanford's first comptroller and served in that position from 1919 to 1937. As comptroller he was responsible for overseeing Stanford's investments, managing its lands, and supervising all new construction. The 1921 Quad was dedicated to Roth. In 1931 he was elected president of the International Rotary. He was a member of the Board of Trustees from 1940 to 1943 and was honored by being admitted to Stanford's Athletic Hall of Fame for track and rugby.]

[Roth was instrumental in the 1933 lifting of Stanford's 500 woman enrollment limit.]

[After he reentered law practice Roth became nationally known as a labor-management expert. During WW II he was a member of the National War Labor Board. He was awarded the Great Gold Order of Honor by the president of Austria. In 1962 he was made an Honorary Fellow at Stanford. In 1982 he was memorialized by an athletic scholarship in his name, the gift of his daughter, Mary Elizabeth Roth Kendrick]

[In an oral history tape Betty Roth Kendrick, Roth's daughter stated, "I think the thing, probably the two things, that he was the most proud of were the Frost Amphitheater and the golf course. Both of those were very personally creations of Dad's. I remember walking with him over the country side, and having him say to me, "Now this is where the first tee is going to be, this is where the first green is going to be." He had the whole course laid out in his mind, completely, even the roughs and the whole, whole thing. And when he hired the

golf architect to come and design the golf course, there was only one major change made from the way he had envisioned it. He loved that golf course." The major change was moving four holes across San Francisquito creek onto the Buck Estate.]

[Bill Roth said that his dad got hooked on golf in the mid 20's. He became a member of the Los Altos Country Club and later held memberships at the San Francisco Golf Club and the Burlingame Country Club. He frequently played with David Walker, '09, a classmate of his.]

FIRST NEWS OF GOLF COURSE

SD 2-7-29 If a series of tentative proposals are carried out, Stanford University may soon have an eighteen-hole golf course. A 12-inch water main running from the campus to Searsville Lake has been operating at its maximum capacity for the past two years, according to Almon E. Roth, Comptroller of the University. Owing to the increased demand for water brought about by growth of athletic field requirements and the increased number of residences on the campus, the 12-inch Searsville line is inadequate.

In order to furnish the necessary increased supply, the University will face the alternatives of building another line to Searsville Lake, six miles away, or enlarging Felt Lake, three miles due south of the Quad, and laying a 12-inch main to the latter body of water.

It is believed that the cost of enlarging Felt Lake and laying a pipeline to that point will not be any greater than the expenditures necessary to construct a second 12-inch main to Searsville Lake. F. A Herrmann has been engaged by the University to prepare plans and specification for the enlargement of the Felt Lake. It is thought that bids will soon be available on the project.

Lack of water supply has previously hindered the construction of a Stanford golf course. The proposed Felt lake line would

practically double the water supply and would pass directly through one proposed location for the golf course. The suggested sites for the proposed golf course are ideally located. Nine holes would be placed near the location off the old stock farm buildings, along the lake, and then to Roble Creek. The second nine holes would be laid on a section of land west of the county road and would continue westward beyond the Lathrop home. A variety of topography and natural hazards is presented on the proposed courses. Soil conditions are excellent.

The suggested enlargement would increase the

size of Felt Lake to approximately fifteen times its present capacity. The storage space of this lake would then be almost equal to that of Searsville. Another advantage of the dual system of water lines is that one branch could be shut down and thoroughly cleaned out during the winter months. No definite steps have been taken as yet by the University toward the laying out of the proposed course.

On February 12, 1929, Comptroller Almon E. Roth requested that the Board of Trustees lease to the Board of Athletic Control for 50 years the land required for a golf course at a rental fee of \$10.00 per acre per year. Mr. Roth anticipated that 9 holes would be located in lots no. 12, 13, and 14 which were bordered roughly by Governor's Ave. (east), Mayfield-Searsville Road (north), County Road (south) and San Francisquito Creek (west). This area originally was used for stock yards and a race track. The additional 9 holes needed would be laid out in lots n. 53, 54, 60, 61, 62, and 63, the



Alfred Masters

area directly behind the Lathrop residence on Alta Vista, bordering San Francisquito Creek (west). The Board of Athletic Control would consider the golf course as part of the Physical Education plant operating the Golf Club on a playing fee basis.

CONSTRUCTION ANNOUNCED

SD 2-27-29 Stanford's proposed golf course, so long a myth, is at last to became a reality. Vital steps toward the construction of an 18-hole campus golf links were taken yesterday when Almon E. Roth, Comptroller, announced that William Bell, national-

ly famous golf architect, has been engaged by the University to make preliminary plans for a Stanford course.

The Board of Athletic Control has authorized Al Masters. Graduate Manager, to investigate the situation and report on the advisability of building the course. If Masters submits a favorable report and the B. A. C. decides to furnish the finances immediately, Stanford students will be swinging their mashies next year on what may be the best collegiate course in the nation.

The Board of Trustees has set aside 125 acres of land near the old stockyards and along the county road near the old Lathrop home. The holes are to be placed near the stock farm buildings along the lake, and then to Roble creek. The second nine holes will be laid on a section of land west of the county road, continuing westward beyond the Lathrop home. A variety of topography and natural hazards is presented.

William Bell will reach the campus Monday [March 5, 1929] to examine the proposed sites for the course and submit preliminary plans. With him will be associated George C. Thomas, Jr., author of "Golf Architecture in America," an outstanding manual on the construction of golf courses. [Appendix E]

Bell and Thomas have designed practically all the famous golf courses in Southern California, among which are the Bel-Air, Riviera, La Cumbra, and Los Angeles Country Club courses.

It is the opinion of Comptroller Roth that the proposed course will be one of the

best and most beautiful golfing greens in the nation. With its oaks, streams, and natural hazards, the Stanford course will rival the famous Yale golf links in beauty and playing facilities, it is the opinion of Roth.

The water question, one of the golf course's main impediments, has now been practically solved, Roth indicated. Plan will soon be completed for the enlargement of Felt Lake to fourteen times its present size. The larger lake will provide an additional 280,000,000 gallons of water and will practically double the University's present supply of irrigation water. The growth of the campus has made the increased water supply imperative, Roth said.

GOLF NEARS ACTUALITY

Night Editor

SD 2-27-29

probability.

One of the finest golf courses in the country!

A possibility has become a fairly certain

One hundred twenty-five acres of rolling land shaded with many a live oak, almost a nat-



ural golf course in itself, has been set aside by the Board of Trustees for a golf course.

Water, vital necessity of golf link health, will be obtained by devious route from nearby Felt Lake upon the installation of a new pipe line.

And the latest news, William Bell and George C. Thomas, Jr. golf course architects of national repute and no means accomplishments, will arrive on the campus to have plans for the links laid out in black and white by the twelfth of the month.

A worthy cause, championed these many moons by golf enthusiasts, sees its realization nearing.

Damnitall, think of all those spring quarter resolutions to be made by future Stanford men and to be lost in the rush of driving, putting, and chasing the elusive par. Here is found another excellent argument for the maintaining of the Lower Division; freshmen would make such fine caddies.

Seriously though, aside from the droves of Bobbie Joneses. Walter Hagens, and Johnny Farrels that will be turned out on that new course, golf will become an institution among the general student body well worth its salt. Any sport that will actively interest a goodly majority of the student body is worth more than any number of wonder teams.

Teams will profit by it, but the general run of students, those individuals who take exercise as a Lower Division requirement and cease exercise thereafter, will have it presented them on a golden spoon and can't refuse it.

Fore! Stanford is about to add another priceless feature to its already matchless campus.

ARCHITECT VISITS CAMPUS

SD 3-5-29 After spending yesterday tramping

through the hills back of the campus, William Bell famous golf course architect, said that he was favorably impressed with the topographical possibilities of Stanford's proposed golf course.

Accompanied by Al Masters, Graduate Manager, and Comptroller Almon E. Roth, Bell made a preliminary survey of the course yesterday. He has been employed by the University to ascertain the feasibility of construction of the links on the land set apart by the Board of Trustees.

The Board of Athletic Control met on Sunday March 31, 1929. "Professor Owens, of the Committee on buildings and Grounds, reported on the plans for the construction of the golf links. He stated that all the indications were favorable for carrying out the plan at the estimate cost, and with adequate support. It was voted to authorize the General Manager to proceed with the construction of a golf course at an estimated cost not to exceed \$100,000.00, as soon as he receives a minimum of 200 applications for annual playing privileges, not over 250, such applications to be accepted at the rate of \$125.00 per year, \$50.00 pavable now and \$75.00 when the links are ready for playing, the year to begin at that time. Preference is to be given to alumni in assigning privileges, decisions as to details to be made by the Buildings and Grounds Committee."

"This action is subject to an arrangement with the Board of Trustees for an adequate loan at a rate not to exceed 5 1/2 %. The Finance Committee was authorized to arrange for such a loan when needed."



BUCK ESTATE

[In looking over the area for the new course the architects wanted to include San Francisquito Creek. The West side of the creek which now has the 8th tee, 12th fairway, thirteenth hole and the 14th tee were part of the Buck estate. Al Roth had considerable diffi-

culty in getting the land. He was able to get the California State Legislature to pass a law permitting him to swap Stanford land in the founding grant with the Buck Estate at no cost. At that time the airport was on Stanford land in the area of College Terrace which was called Mayfield. Roth had one of the pilots fly him to Sacramento to lobby for the new law. They flew in an open cockpit biplane.

MEMBERSHIP SALE

SD 4-2-29 As soon as two hundred "one year playing privilege" memberships are taken up by the general public, construction work on Stanford's proposed eighteen-hole golf course will begin. This announcement was made by Graduate Manager Alfred Masters in offering 250 playing privileges to the general public.

Student and faculty members may take out a one or three months playing privilege upon the payment of \$6 or \$15, respectively. The Board of Athletic Control has authorize Masters to begin construction of the course as soon as two hundred of these playing privileges have been taken up. It also stipulated that the total number, excluding students and faculty members, shall not exceed 250.

The cost of the general public playing privilege for the first year is to be \$125. Fifty dollars must accompany the application and the other \$75 is payable on or before the day of the official opening of the course. Under the "one year playing privilege" an individual will have the free use of the course from Monday to Friday; and on Saturdays, Sundays, and holidays, will be permitted to play upon the payment of a \$1 green fee. Wives and minor children of individuals holding playing privileges will be permitted to play from Monday to Friday upon the payment of a \$1 green fee, and on Saturdays, Sundays, and holidays for a \$2 green fee.

Persons holding playing privileges may have guests on the course by paying a green fee of \$1.50 from Monday to Friday and \$2.50 on Saturdays, Sundays, and holidays. In future years, as long as the general public is permitted to play on the course, holders of the original playing privileges will be given preference.

For the purpose of determining eligibility to playing privilege on the golf course, "faculty members" is defined as all members of the University staff whose names appear in the Directory under the heading of "Officers of Instruction and Administration," but not including "Assistants in Instruction and Research.

Holders of the faculty or student playing privilege may use the course from Monday to Friday without additional charge but must pay a green fee of \$1 for Saturdays, Sundays, and holidays. Students and faculty members who do not take out a one or three months playing privilege may use the course upon payment of a \$1 green fee from Monday to Friday and a \$2 green fee Saturday's Sundays, and holidays. Applications for playing privileges may be secured at Palo Alto Chamber of Commerce or at the Stanford Board of Athletic Control offices.

COURSE TO PAY FOR ITSELF

Night Editor

SD 4-2-29 Two hundred fifty playing privileges, after the fashion of ticket rights to stadium subscribers, are now open to peninsula golfers and others on the proposed campus golf course. When \$25.000 is accumulated from the sale of two hundred of the year playing privileges, construction of the new course will start. The plan of financing the links is feasible if there are two hundred golf enthusiasts to be found hereabouts, otherwise it stands on shaky ground. Late report places the number of subscribers to date at eighteen.

With the course paying for itself in this manner no objection can be raised by other groups who would raise loud objection were it financed otherwise, which, let it be added, is fine. The new financing plan offers a democratic angle to the project in that it allows others besides students and faculty members the opportunity to use the course. It is commendable that the campus with its many excellent advantages should share some of these with outsiders.

TIME FOR STUDENT ACTION

Night Editor

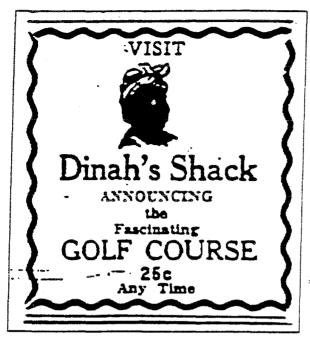
SD 4-9-29 The Daily in co-operation with the Board of Athletic Control prints today a small questionnaire concerning the proposed golf course. It requests that all students who have any interest whatsoever in the course fill out the blank and see that it reaches the Board.

The ball has been started rolling toward making the long dreamed of links a reality. The Trustees have set aside the necessary land. Foremost golf-architects have been secured to construct an excellent course. A plan has been devised to gain certain outside funds to aid it along. Now it remains to find out just what the opinion of the student body is on the matter. The playing privileges open to outsiders will pay for part of the project, but only a part of it. Student support must be had to put the thing over. In the last analysis the entire project is for the benefit of the student body, so the student body can do its part now by giving the Board some concrete idea of the weight of student interest in a golf course.

DRASTIC REVISIONS

SD 4-19-29 A revision in the scale of prices for the general public playing privileges on the proposed Stanford golf course was announced yesterday by the Board of Athletic Control. The drastic changes are:

- 1. Cutting from 250 to 200 the number of general public playing privileges.
- 2. Abolishment of green fees on Saturdays, Sundays, and holidays for holders of privileges.
 - 3. Abolishment of green fees during week-



days for wives and minor children of holders of privileges. However, the original \$2 fee for Saturdays, Sundays, and holidays remains."

It is estimated that these reductions will save the player approximately \$100 a year. The changes were announced following the partial compilation of answers from students and faculty members in a board-conducted survey on the campus. The results indicate so far that 123 of the faculty will make use of the course. More than three-fourths of the students approached signified their intention of playing. The general public playing privilege is for sale at the original price of \$125.

BOARD MEETING

SD 4-28-29 The General Manager reported that he had received 87 applications for outside playing privileges on the proposed golf links, and that more were expected. He presented estimates of costs and receipts covering a golf course based on 100 outside playing privileges. It was voted to modify the action taken on March 31, 1929, to limit the number of outside playing privileges to 150, and to authorize the Manager to proceed with the construction at once.

The Board to carry on its books a charge against the golf course covering the final total cost of construction, interest on this cost to be charged at the rate of 5 1/2 %." [This was reduced to 5% the following year effective September 1, 1931.]

It didn't take long to get construction started. On April 30, 1929, the architects were ordered by Alfred G. Masters to take charge of the project at once. "Dreams of a Stanford golf course, are near realization with the announcement yesterday that Al Masters, General Manager of the Board of Athletic Control, had been directed by the organization to begin construction of the project at once. Word of the move was dispatched to Bell and Thomas, nationally famous golf course architects of Pasadena, who were ordered to take charge immediately."

SD 4-30-29 The final straightening out of irrigation difficulties, which heretofore has forestalled the project, was thought to be the main reason for the move toward making the new course an actuality, although the Comptroller's office declined to make any statements regarding the matter in the absence of Comptroller A. E. Roth.

The new grass course is expected to be one



of the finest and most picturesque in the state, and will cost approximately \$100,000. The present layout of the course provides for the first nine holes between Lake Lagunita and San Francisquito creek and north of the County Road. The last nine will be located on the other side of the road and will run south and west into the hills. The course is expected to be completed before February 1 of next year.

Because of apparent lack of interest among people of the vicinity who are eligible for outside memberships, the Board has decided to cut the maximum number eligible from 200 to 150. Ninety-six of this number have already made a \$50 deposit, which entitles them to priority membership rights. Green fees of \$6 per month or \$15 per quarter will be charged students and faculty members.

CONSTRUCTION STARTED

SD 5-16-29 With preliminary surveys nearly completed, actual construction of the Stanford golf course will start sometime next week, William P. Bell Pasadena golf architect, who is in charge of the project, announced today. In spite of the fact that he has built some of the best courses on the Pacific Coast, Bell declares that none of them will be superior to the Stanford links. Bell has designed and built such courses as Castlewood, El Cabalero, Chevy Chase, Fox Hills, Arizona-Baltimore, La Jolla, Long Beach Municipal, Augua Caliente and has been associated with George C. Thomas Jr. in the construction of Ojai, La Cumbre, Bel-Air, Riviera and the Los Angeles Country Club.

"There is real character to the Stanford course," Bell said. "We have some beautiful territory with which to work and expect to turn out a fine product. One of the most interesting features of this course is that there are no two holes alike." The Stanford course will be an 18 hole championship affair, which will total approximately 6400 yards for ordinary play

but may be lengthened to over 6600 yards for championship matches. The additional yardage will be added by moving the tee blocks back, as practically all holes will be provided with two sets of long tees.

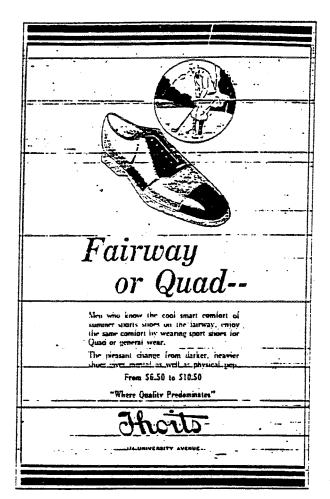
According to Bell the first step in construction will be grading, followed by installation of the sprinkling system. Planting will follow the beginning of actual work by about two months. The architect predicts that the Stanford course will be ready for play before January 1, 1930.

SD 5-23-29 Actual construction work on Stanford's 18-hole will get under way today when workmen begin grading on hole No. 2 near the old Stanford stock farms. The grading of the course will probably not be completed before July. Thomas and Bell, nationally known golf course builders, are in charge of the construction. The work is to be centered near the water reservoir of the stock farm, branching out from there in all directions. The installation of the sprinkler system will take place just before the grading work is ended and the planting of the turf begun.

SD 6-25-29 Locations at Stanford Links Changed by Architects to Save Scenery. Only seventy-five oak trees of the approximately five thousand that cover the 175 acres of Stanford's championship golf course were removed in order to make room for the fairways of the eighteen holes. The architects, Thomas and Bell of Pasadena, who built Castlewood and Bel-Air, made every possible effort to save the trees by redesigning the locations. The course will cost fully \$100,000 and will be ready for playing by the first of next year. The grass will be planted in August. About one-half of the \$42,000 a year necessary for maintenance will come from one hundred and fifty outside memberships, each costing \$125 a year.

The charge to students and faculty members will be one dollar on week days and two on





Saturdays and Sundays, and holidays under the "pay as you play" plan. For the "fanatics," the privileges for three months will cost \$15. As yet, no club house has been provided but one will be erected as soon as sufficient appropriations are made. At present the equipment includes a caddie house, workshop, and concessions. The fairways of nearly four miles have a capacity of between three hundred and four hundred players a day.

The normal course is 6400 yards long but the Stanford course, by teeing off the back of the greens, is 6640 yards. Cocoos bent grass is to be used on the greens and Patravalias and Kentucky Blue Grass on the fairways.

Experts will find the course a difficult one, yet at the same time it will accommodate the worst dub, who is wise enough to go around the trees and hazards instead of over them. The course crosses the creek five times.

Some sort of precaution, such as a net, will protect autos on the road past the first tee. A foot bridge is to be built across the road. The work of grading and constructing the sand traps and bunkers, including the laying of pipe lines, is being carried on by the Board of Athletic Control. As yet the pro has not been selected and applications are still coming in for consideration.

SKULL AND BONES

SD 6-25-29 Excavation turned to exhumation on the new Stanford golf course last Saturday [June 22,1929] when workmen uncovered several ancient graves and found themselves face-to-face with the skeletons of some early California Indians. The pipe-line trencher ran the boney gauntlet, throwing the remains of the Redskins far into the air and the workers into retreat. A stealthy re-approach resulted in the discovery of several mortars and pestles in addition to the human remnants. That the skulls were those of early Indians was announce by Professor Tolman of the Geology department after a careful examination. The bones will be retained in the department and the crude utensils will be sent to the museum.

BLAZE ON GOLF LINKS

SD 7-2-29 In a fire this morning which was fought by nearly twenty men, approximately twenty-five acres of the Palo Alto Stock Farm was burned over. The blaze started when a fire which was burning grass of the first fairway of the new Stanford Golf Links got out of control and spread into one of the paddocks of the stock farm.

COMPTROLLER'S REPORT

August 1929 On June 1 the Board of Athletic Control began construction of an 18-hole golf course, to cost approximately \$150,000. The course is being built under the direction of Mr. William Bell, well-known golf architect of Pasadena, California, who has designed and

built many of the finest courses in this country. The course was designed jointly by William Bell and George C. Thomas author of "Golf Architecture in America".

An area of approximately 10 acres, lying in the center of the course and beautifully wooded with oaks, has been set aside by the Board of Trustees of the University as a memorial park to be known as "Electioneer Park."

The course is being financed with funds derived from football games, and will be operated by the Board of Athletic Control as a part of the University physical education plant. The course will be open to all students and members of the faculty upon payment of a reasonable green fee, and to a limited number of persons not connected with the University upon payment of an annual fee of \$125.00 for full playing privileges. It is estimated that approximately 200 persons not connected with the University can be accommodated. membership for outside members is on an annual basis, and such members are given no assurance as to the continuation of the privileges, and have no voice in the management of the course.

CRUICKSHANK AND AL ESPINOSA

[Before the course opened, Al Espinosa and Bobby Cruickshank played it with Al Masters and Almon Roth. Roth's son Bill was ten at the time and caddied for him. There were no cups in the greens so they used stakes. This was the year that Al Espinosa tied Bobby Jones in the Open but lost in a 36-hole playoff by 23 strokes. In 1923 Jones tied Cruickshank who birdied the last hole. Jones won by two strokes in the playoff.]

OPENING ANNOUNCED

SD 12-3-29 Stanford's new golf course will be completed and officially opened on January 1, announced Graduate Manager Alfred R. Masters yesterday. At that time Masters expects the professional's shop and the road to

the shop to be finished, and the course ready for use. Garry Bennett a Stanford graduate has been selected as instructor at the course.

SD 12-10-29 Winter rules, teeing up on the fairways being the principal one, will not be observed, according to Architect Bell, designer of the course. However, in order to protect the new grass from the tramping of a large gallery, no matches between outstanding golfers of the country will be scheduled until later in the year.

PAT 12-30-29 A golf shop conducted by Garry Bennett '12, for eight years a professional and Woodbridge Golf and Country Club pro at Lodi for the last two and a half years, will contain all needed items and will offer conveniences, Bennett will be assisted by Floyd Finch, former Portland amateur champion.

JANUARY 1, 1930

PAT 1-1-30 Fifty-four golfers flocked to the new Stanford Golf Course within the first hour of its opening this morning, and to Burt Jayne, E. W. Wright, D. R. Kinkead and R. L. ("Dink") Templeton go the honors of composing the first foursome to tee off the elevated first tee and drive a white pellet down the dogleg 490 yard first fairway. [Bill Faxon played poker with Dink.] Garry Bennett and Floyd Finch, professionals, were working at top speed organizing things, and Bennett hopefully was looking forward to the end of two weeks, by which time he hopes to be able to find time to test the stiff layout, par for which is 71. [Appendix F]

SD 1-2-30 Stanford's new \$145,000 [Comptroller's Report, 1930, \$188,000] 18-hole golf course was formally opened yesterday. The professional's shop and the road to the shop are practically completed as is the bridge high above and across the Mayfield-Searsville road affording a safe and easy way

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tar Hoopsters

of t waker but stub- point to give Sigma Chi the game, regregation to win by a 26 to 6, 1907 Signature

From the golf play has emerged three; of the four semi-final links me in the rapidly close teams. Zeta Psi, D.U., by virtue of defeating the Dekes, Sigma Chi, at the expense of Phi Kaps, are the semi-final competitors.

Entry lists for the track meet will rocks speedy running remain open; until Friday, it was

The signe Chia came second and third round matches are of push over another six not played off by Friday, they will drive than started with be defaulted to the supper teams.

prose First String Women Must Wear prose First String White; Carry Pompoms who pian to string the

ara to furnish opposition, gooding section at the Big Game Sat-Burn's varsity baskes - urday will be required to wear white vill play a practice game biouses at sweaters and carry pomivilluntest and clock this poms, according to announcement mismost 4 to the conference by the Rally Committee last lal Edelen, all conference pight by the Edelen, contex of last war, the hien must have rooters' hats to be Absolute of the lands admitted to the section. They are in the lands of the section of the lands of the section. They are in the lands of the lands thy be the other stummi is limited, and women who do not

Bally Committee Stunt Committe tex Bended by Nancy Brayton and Dick Stark, he was a stark of the star

By ROBERT TISENBACH The name of George C. Thomas of Specialions while on The name of George C. Thomas Specialists while an also death bed seldom is spoken when the smant of in his loss hopes the first of driving from sends little white seldom in his loss hopes the first of a golf course and the syst of go between Driving Delivers his loss than special grant up as they survey the transpose of the first seldom sends the syst of go between Driving Delivers his little bed in the syst of go between Driving Delivers his little bed in the syst of the syst seldom sends the syst of the syst seldom sends here in the syst seldom sends the syst seldom sends are driving the syst seldom sends the syst send telling grow particular to the control of the contr sally in recognized has her component Midrama death, It has more it has the behavior of the selection of the sel irony and frustration, for though Mr. and distinguished; career, as a golf-

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Lost in paradise



THE PRESERVE GC HAS TO HAVE THE greatest entry drive in golf. Once through the front gate, it is an eight-mile ride to the clubhouse of the exclusive new private course east of Carmel. Calif. The road winds through eight miles of unblemished coastal California scenery that begins with several hairpin turns upward, cresting on a moun-

tain ridge where you can glimpse the Pacific Ocean to the west. Then it descends into a primeval forest of oaks bathed in green moss. By the time you emerge from the forest into a vast meadow, you half expect to see a brontosaurus lumber by. What you do see are herds of deer, coveys of quail and the occasional mountain lion. A few more turns and civilization comes into view, first in the form of some fence rows, then as an old hacienda, recently retrofitted into what is called The Ranch Club. Even then, the golf course and its clubhouse are still a mile away. By the time you reach the bag drop, the real world, with all its tension, is long forgotten.

The Preserve. you see, is part of the 20.000-acre Santa Lucia Preserve. south and a bit inland from Pebble Beach and the Monterey Peninsula. It is the only golf course that will ever be built within this "community preserve." an area roughly the size of the island of Manhattan that, when fully developed, will have just 350 homes. I'd been here before, back before a single spade of earth had been turned. (See "Sound the Retreat," *Golf World*. Oct. 20, 1995; and "A big break lost," *Golf World*. May 24, 1996.) Back then, what development team spokesman Tom Gray promised was a golf course that barely scratched the surface of this gorgeous landscape. What I found on my latest visit is that they delivered.

The Preserve was routed by Mike Poellot, a talented but unsung Silicon Valley course architect who guided the project through all the demanding regulatory minefields. Then, the terrific Tom Fazio was hired to actually design the course. Serving as consultant to both architects was former U.S. Golf Association president Sandy Tatum, who was a driving force behind the entire preserve, a tribute to his close friend. Peter Stocker, Santa Lucia's original developer who died in a helicopter crash.

Fazio and his team (Dennis Wise, Kevin Sutherland and Jaime Santiago) showed genuine restraint and respect for the locale. They had to use Poellot's routing plan, which was set in stone by the approval process. I doubt they could have improved upon it. The 18 holes amble effortlessly across hillsides, down valleys and beneath white chalk cliffs. There is none of the usual gingerbread associated with a Fazio design at The Preserve, no massive earth sculp-

tures, no tee-to-fairway waste areas of sand, no cascading waterscapes. (There is one tiny waterfall that trickles beside a cart path between the seventh green and eighth tee. It was there when they started.)

The shot strategies are straightforward, dictated by folds in the land, framed by mammoth oaks and accentuated by Fazio's suitably austere bunkering. The tees are placed so that nearly every drive is downhill (or over a vailey) and the greens are in logical, natural locations. Even the blind one on the par-5 17th makes sense. This is a private course, after all, where players can be expected to possess local



No. 3 at The Preserve, which shows respect for the locale.

knowledge. The Preserve is California architecture in the tradition of Stanford GC or The Meadow Club. It is part of its surroundings, not distinct from it.

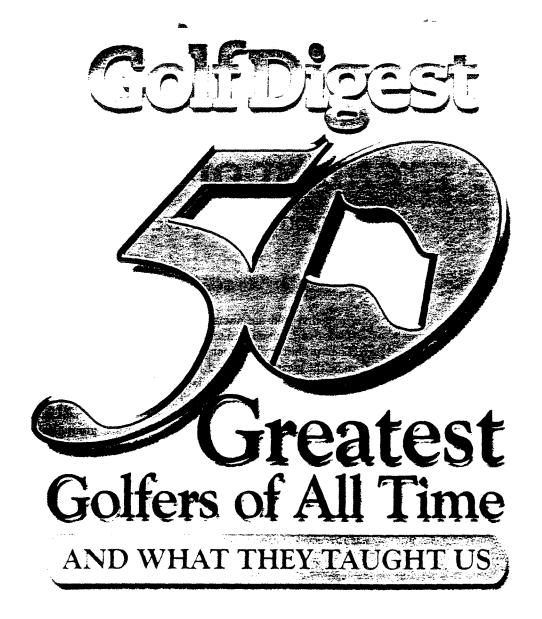
This is especially true at the 11th hole, a stunning par 4 that rolls along slopes to a green edged by a ravine. Beyond the green stands a grove of enormous Sequoia trees, it was so alluring that I was tempted to immediately hop a fence and get lost in the dark shade. Instead, after a tour of the course. The Preserve's head pro. Chris Pryor (who last year left his position at Pebble Beach GL for this dream job), showed me a back road into the grove. There, among massive tree trunks. I found some picnic tables and a couple of barbecue grills, but the golf course was nowhere in sight. The grove, which I thought was right behind the 11th green,

was actually a good quarter of a mile away from it.

Such are the illusions in paradise.

X

NON WASTIEN



EDITED BY GUY YOCOM

Illustrations by Keith Witmer

erhaps the landscape of competitive golf is too road, elastic and time-warped to even attempt this. ras are distended and sometimes overlapping trength of competition swells and deflates. Major nampionships gain and lose recognition. Money is a impossible barometer. And how do you compare lickey Wright to Bobby Jones anyhow? With all at, here it is: Our ranking of the 50 Greatest olfers of All Time, which rates, parenthetically, as ne of the most ambitious projects in the 50-year story of GOLF DIGEST.

Our voting panel was not shackled by a formal set criteria. The methodology: We circulated 60 llots to members of our Professional Advisory Staff, aching Professionals, Contributing Editors, house editors and a select group of writers and historians. We asked them to rank the top 10 players in order, and to then place the remaining players in descending groups of 10. Points were awarded for each 10-golfer bracket, with bonus points given to the special players who fell within the top 10.

The ranking does not intend to quell controversy. No ranking ever has. Our fervent hope is that it inspires argument at every station, from No. 2 to No. 50. (You'll give us Jack Nicklaus as No. 1, won't you?) The instructional points set forth by the greatest golfers who ever lived should help your game as well. Finally, we hope the essays contributed by many of the world's most accomplished writers, athletes and high-profile figures will entertain and enlighten you as to the legacy of these remarkable individuals.

Mickey Wright

She sought perfection on every swing



BY BETSY RAWLS

Member, LPGA Hall of Fame

As people watched Mickey play golf during her career on the LPGA Tour, what they saw was a nearly

perfect golf swing, a display of power not exhibited since Babe Zaharias, and golf shots unlike any that had been produced by women golfers up until then. They also saw an attractive, polite, soft-spoken, dignified young woman who accepted applause and praise with great humility.

What they didn't see was a woman consumed by the need to win tournaments. Mickey's drive to excel at golf, indeed to be the best golfer in the world, started the day she picked up a club for the first time, and it finally helped send her into early retirement.

Mickey was a perfectionist about most things she did, but she took it to an extreme with her golf swing. Mickey didn't just want to hit a golf ball onto the green and close to the hole, she wanted to do it with exactly the right ball flight—a ball that had maximum carry, with a slight draw, that hit softly and stopped on the green. To attain the shots she wanted, Mickey strove for the perfect golf swing throughout her career, and she came close to achieving it.

As a teenager in California, Mickey drove from San Diego to Los Angeles once a week to work with golf professional Harry Pressler. Mickey never stopped believing in the principles she learned from Harry and has used the same basic swing she developed

Some experts say Mickey Wright's swing was the best in the game, period.

as a youngster for almost 50 years.

Mickey's record in golf is phenomenal. She stopped playing regularly on tour in 1969, a mere 10 years after her first LPGA victory. During a 10-year span from 1959 to 1968 she averaged 7.9 wins per year. In 1963 she had an amazing 13 victories! Her 82 victories



include 13 "major" championships and other records that probably won't be broken. Just a golf swing, no matter how good, won't produce performances like Mickey's. Of all the qualities that led to Mickey's success, her drive to be the best was the thing that fueled her career. Mickey had to win. She felt that a lessening of her obsession diminished her chances of winning. Mickey could never tolerate being anything but the best, and she knew herself well enough to know when the time came that being the best took more out of her than she had to offer. These feelings, along with a foot problem that made it difficult to play in golf shoes, led to the end of her playing regularly after the 1969 season. In the 15 years of full-time play, she averaged a truly remarkable 5.4 victories per year.

Mickey today is a delight to be around. She has a great sense of humor, curiosity about the world around her, interest in other people and absolutely no need to be the center of attention. She won't play golf with people, but she loves to go out by herself early in the morning with one club and play nine or 18 holes. She still loves the game, still works on her golf swing, still hits golf balls, but now she has fun doing it.

Mickey Wright won 82 LPGA Tour events, including 13 in 1963 alone. She won 13 major championships, including the U.S. Women's Open (1958, '59, '61, '64), the LPGA Championship (1958, '60, '61, '63), the Titleholders Championship (1961, '62) and the Western Open (1962, '63, '66).

Tom Watson

His swing—and character—remain true



BY FRANK D. (SANDY) TATUM

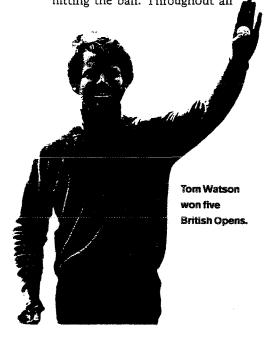
USGA President, 1978-'79

Tom Watson is a name that sounds like the name of a golfer. In my book a golfer is someone who:

- appreciates the privilege of being able to play the game;
- respects its values and traditions;
- respects the game's rules, and plays accordingly;
- ➤ handles success with charm;
- handles failure with grace:
- adds something positive to the experience of those with whom he or she plays.

Tom Watson certainly qualifies on all counts, so the name fits. There are, moreover, additional factors that identify Tom.

He has an exceptional golf swing. It manifests a no-nonsense approach to hitting the ball. Throughout all



the good years and all the not-so-good years it has remained beautifully intact.

He has a real reverence for the game, which adds a distinctive quality to watching him play. Verve, heart, intelligence and imagination are characteristics that have added so much to his career. He has a capacity to focus on the shot to be played. Perhaps more than any other single characteristic, it is the intensity of such focus that separates the great players from the rest.

His duels in the sun with Jack Nicklaus are legendary. The last two rounds of the 1977 British Open at Tumberry when Tom shot 65-65 to win by one over Nicklaus, who shot 65-66, surely rank with the most sensational performances in the history of the game. Hubert Green, who finished third, was 11 shots back!

Tom's record, however impressive, cannot express how he relates to the game and the people with whom he plays. I've had the privilege of playing a wonderful lot of golf with him in a wonderful lot of places. Those experiences included playing with him over a period of 20-plus years in the Crosby/AT&T.

One episode revealing how he deals with failure occurred when his game was in an awful slump. The slump seemed to have reached its nadir when he made a desultory double bogey on the 17th hole that caused him to miss the cut in the AT&T. Later, when we were leaving the clubhouse after a late lunch at Cypress Point, he checked the time. I said, "Why are you looking at your watch?" He replied, "It's only 4:30, and we have time to play nine holes." My noting that we had no clubs, shoes

or sweaters and that there was a cold, damp mist blanketing the course chilled by a stiff wind did not deter him. With borrowed gear and clubs borrowed from Hank Ketcham (the creator of Dennis the Menace), off we went into the mist and the rapidly declining light. If there is more sheer joy to be derived from playing golf than that we shared in that setting, I have not experienced it.

Another illustration of how he relates to playing the game occurred at Dornoch in Scotland. We had played a round in the late afternoon in heavy rain and a stiff wind in front of a large gallery of people who somehow had learned that Tom Watson was playing the course. As we played the 18th hole at about 6 p.m. he said, "Let's tell the caddies to go home and come back in an hour so that we can play again without the gallery." They and we did so. As we were playing the third hole in the fading summer light he stopped and said, "I have something I want to say, Tatum." I said, "What do you want to say. Watson?" With wind whipping his rain suit and the rain splattering on his face he replied, "This is the most fun I have had playing golf in my whole life!"

This, in essence, is Tom Watson.

Watson collected eight major championships, including five British Opens (1975, '77, '80, '82, '83), two Masters (1977, '81) and the U.S. Open (1982). He won 34 tournaments on the PGA Tour, was leading money-winner five times and Player of the Year a record six times. He is a three-time winner of the Vardon Trophy. His Ryder Cup record is 10-4-1.

Tiger Woods

Today's dominant player transcends the game





I hear Tiger Woods has taken batting practice once or twice. The scouts tell me he has "warning-

track" power. So I'm here to say, "Tiger, warning-track power is not going to get you too far. Better keep the day job."

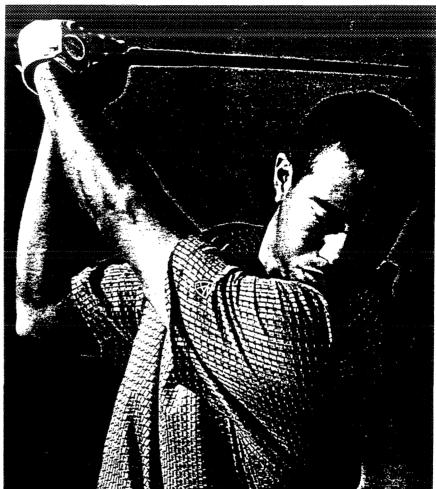
What a job he's doing. Right after he won the 1997 Masters, and I mean right away, I saw more African-American kids on golf courses than I'd ever seen before. It was inspiring in ways that I never would have imagined growing up in Mobile, Ala.

Golf has never been a black child's game, because it's not a game you can play for \$1.50 or \$2, and most of the places where you could play were whites-only.

When Tiger set all those records at that Masters, it reminded me of the way we used to gather around the radio and listen to Joe Louis' fights. The only difference with Tiger is, people gathered around the TV. His winning meant the same things to us that Jackie Robinson meant in baseball and Joe Louis meant in boxing. He lifted us up and showed us what we could do.

The first time we met, I thought he might have the whole package of qualities that make for greatness. Not only did he have unique talent, he seemed to have unique commitment to that talent. He wanted to be the best and was willing to do the hard work necessary to get there.

I saw the full realization of that commitment in the last couple of years. It's one thing to go out and hit that ball farther than anybody else. That doesn't mean you're the best. You're the best



What he taught us: Woods' short game is spectacular, his putting stroke divine, his will to win unmatched. But the essential part of Woods' game is power. To blast the ball out of sight while keeping it in play, he recommends. "On the backswing, let your right elbow come away from your side, but make sure it points to the ground." Call it coincidence, but his role model for immortality, Jack Nicklaus, carried around the same thought.

when you can fine-tune your game to win anywhere, anytime, in any way.

We first met at an awards function. He was in school at Stanford. He must have been 18, 19. I knew at that first meeting that he was special. He was impressive. Very bright, composed, mature way beyond his years. And he not only had something interesting to say to you, he was interested in what you had to say to him.

At 24, Woods has won 18 PGA Tour titles, including two pro majors (1997 Masters, '99 PGA Championship). His S6.6 million in tour earnings for '99 was nearly S3 million more than his nearest competitor made. He already stands first on the career money list. His amateur record includes three consecutive U.S. Amateur titles (1994-'96) and three straight U.S. Juniors (1991-'93).

MANGRIAR



August 4, 2000

Santa Clara County Planning Commission Santa Clara County Board of Supervisors Attention: Supervisor C. Joseph Simitian 70 West Hedding Street San Jose, California 95110

Re: Analysis of Annual Rounds at the Stanford Golf Course, Stanford, Ca. EIR Comment, Stanford University Draft CP / GUP Application

Dear Planning Commission and Supervisors:

This is a short opinion letter from Economics Research Associates (ERA) regarding possible market implications of a partial or complete re-routing or closure of the Stanford University Golf Course. As discussed in more detail below, ERA is very familiar with the Stanford Golf Course and the golf industry in the Bay Area.

ERA'S GOLF INDUSTRY QUALIFICATIONS

ERA is a diversified consulting firm founded in 1958 which provides a wide range of research services in economics, finance, and market analysis. The firm's principal areas of expertise are golf, recreation and resort planning and economics, as well as real-estate and land use strategies. Over the past 42 years, ERA has completed over 13,500 assignments for public and private sector clients, and now completes 75 to 100 major golf studies per year. ERA has offices in San Francisco, Los Angeles, San Diego, Chicago, Washington, D.C., and London.

Golf

ERA is the largest and most experienced golf economics consulting firm in the U.S. ERA's clients include private developers, financial institutions, municipalities, public agencies, public / private joint ventures, and golf course operators. ERA's assignments in the golf industry include market evaluations, forecasts of course performance, appraisals, operational audits, and evaluations of lease arrangements including capital investment strategies and alternatives. In the Northern California, ERA has performed the market and financial feasibility studies for the following facilities. The golf course architect is listed in parenthesis:

- 1. Coyote Creek, San Jose, California (Jack Nicklaus).
- 2. Cinnibar Hills, San Jose, California (John Harbottle)
- 3. The Ocean Course, Half Moon Bay, California (Arthur Hills).
- 4. San Juan Oaks, San Juan Bautista, California (Fred Couples and Gene Bates).
- 5. Wente Vineyards, Livermore, California (Greg Norman).
- 6. NCGA Poppy Ridge, Livermore, California (Rees Jones).
- 7. Eagle Ridge, Gilroy, California (Johnny Miller / Ron Fream)
- 8. The Bridges, San Ramon, California (Johnny Miller / Robert Muir Graves)
- 9. Saddle Creek, Copperopolis, California (Jay Moorish).
- 10. Rancho Monterey, Monterey, California (Jack Nicklaus).
- 11. The Stevinson Ranch Golf Course, Merced, California (John Harbottle).
- 12. Twelve Bridges, Sacramento, California (Dick Phelps).
- 13. Castle Oaks, Ione, California (Bradford Benz).
- 14. Green Horn Creek, Angel's Camp, California (Don Boos).
- 15. Diablo Grande, Stanislaus County, California (Dennis Griffith & Associates).

In addition to work on the above listed new projects, ERA has completed a great deal of work on existing golf facilities including the Stanford Golf Course, the Harding Park municipal golf course in San Francisco, and the DeLaveaga municipal golf course in Santa Cruz.

SOURCES OF PLAY AT THE STANFORD UNIVERSITY GOLF COURSE

With an opening in 1930, the Stanford University Golf Course is generally considered to be one of the top golf courses in Northern California. The 18-hole, par 71, 6,778-yard course was designed by George Thomas and the course features dramatic topography. Among other things, the Stanford golf course has served as the home course for world-class golfers such as Tom Watson, Tiger Woods, and Mickey Wright.

It should be noted that, as a university golf facility, the Stanford Golf Course is unique in the Bay Area. This is because as compared to a typical public or private facility, the sources of play are far more diverse. For example, the following is an approximate overview of sources of play for 1998 and 1999:

Sources of Play	Rounds, 1998	<u>%, 1998</u>	Rounds, 1999	<u>% 1999</u>
Members, Regular	21,160	31.7%	22,846	32.0%
University Related Play				
	10.015	10.20/		10.00/
Students	12,817	19.2%	13,474	18.9%
Faculty / Staff Members	3,177	4.8%	3,122	4.4%
Faculty / Staff, Daily-Fee	1,891	2.8%	2,283	3.2%
Golf Teams	4,239	6.3%	3,555	5.0%
Golf Course Employees	4,174	6.2%	4,987	7.0%
Subtotal	26,298	39.4%	27,421	38.4%
Outside Play				
Member Guests	10,772	16.1%	11,366	15.9%
Alumni	1,619	2.4%	2,172	3.0%
Charity Tournaments	3,810	5.7%	4,463	6.3%
Juniors / Univ. Guests	3,147	4.7%	3,065	4.3%
Subtotal	19,348	29.0%	21,066	29.5%
Total Rounds	66,806	100%	71,333	100%

Source: Stanford University Golf Course

Figures do not add up exactly to 100% due to rounding

As shown above, the Stanford Golf Course is a semi-private facility since it combines member play with daily-fee play. Members pay a one-time initiation fee and annual dues and all other sources of play are on a daily-fee (pay a daily greens fee) or complimentary basis. As shown above, sources of play on the golf course are allocated about 32 percent to regular members, about 38 to 39 percent for university-related play, and about 29 to 30 percent for outside play.

If the golf course at Stanford were to be substantially modified (either closed for one to two years or more, closed permanently, or reduced to 9-holes, etc.), there is the question of where the diverse sources of play would be accommodated. As shown below,

the Bay Area is ranked among the worst-supplied areas in the U.S. for public-access golf, and public courses in the area are already at capacity, or near capacity levels.

PUBLIC GOLF IN THE BAY AREA

The National Golf Foundation publishes a ranking of Metropolitan Statistical Areas (MSA) in terms of golf supply. The greater Bay Area includes the following six MSAs: 1) Oakland, 2) San Francisco, 3) San Jose, 4) Santa Cruz / Watsonville, 5) Santa Rosa, and 6) Vallejo / Fairfield / Napa. The rankings, which measure the number of golf holes per 100,000 residents, are shown below for each of the MSAs.

National Rank of Public Golf Hole Supply (1 is highest supplied; 317 is lowest supplied)		
San Francisco	311	
San Jose	310	
Oakland	307	
Valleio/Fairfield/Napa	243	

292

245

Source: National Golf Foundation.

Santa Cruz/Watsonville

Santa Rosa

Out of 317 MSAs in the U.S., the San Francisco, San Jose, and Oakland MSAs are ranked among the absolute lowest in terms of public golf supply in the U.S. with rankings of 311, 310, and 307, respectively.

With the Bay Area ranked among the absolute worst supplied areas in the U.S. for public golf, it is not surprising that courses in the local area are very crowded with annual rounds at capacity, or near capacity levels. The following is an overview of the approximate number of annual rounds played in 1999 for public-access golf courses in the Stanford area:

Facility Name	Annual Rounds, 1999
Sunnyvale Municipal	101,000
Santa Clara Municipal	100,000
Palo Alto Municipal	1/
Santa Teresa Muni (San Jose)	96,000
San Jose Muni	97,000
	1

^{1/} Typically about 100,000 rounds; however, course renovations reduced play to about 74,000 in 1999

It is ERA's observation that these play levels are among the highest observed anywhere in the world. With play levels of about 95,000 rounds or more, courses are at effective capacity levels and any variations in play from one year to the next are primarily determined by variances in the weather.

CONCLUSION

In conclusion, in the event that the Stanford Golf Course were to be closed, either wholly or partially, or temporarily or permanently, or if the quality of the course design were to be compromised, about 70,000 rounds of golf would be affected and / or displaced. Given the under-supplied nature of public golf in the Bay Area, and the fact that most local courses are very busy and are at effective capacity levels, there is very little capacity in the region to absorb these rounds.

Respectfully Submitted,

Richard Warfel Senior Associate

J. Richard McElyea

Executive Vice-President

Our Town: Save hole #1 ease Page 1 of 3

by Marc Igler



Publication Date: Wednesday Jul 26, 2000

Our Town: Save hole #1, please

I started golfing when I was about 12. For the next several years, more often than not, I could be found out at Palo Alto Municipal Golf Course, or as it's more commonly known, "Muni."

As someone who grew up on a muni, there was always something tempting about being able to play on a private golf course. When you're a kid and a golfer, it's more than a temptation. It's a life challenge.

So, it should come as no surprise that I used to sneak onto the Stanford Golf Course every chance I got. My buddies and I would usually creep on at either hole two or four, and play as long as we could until one of the marshals--old guys who wore red jackets and putted along at about 5 mph in their golf carts--would catch up to us and give us the heave-ho.

Sometimes, however, they'd let us play, figuring, I suppose, we were better off lobbing wedges at greens than causing trouble down at the mall. So we'd keep going. We'd play the whole front side, then start the back.

One hole we never got to play, however, was No. 1, that majestic opening hole that sets the tone for the entire course. We couldn't very well stride onto the first tee, in clear view of the pro shop and starter, and let one rip down the fairway as if we were paying members.

To this day, I've only played No. 1 a few times, on those rare occasions when I've been a legal, paying guest. Anyone who's ever played Stanford can't be happy with what the university is now considering. It's Our Town: Save hole #1 lease

recently come out that the first hole--and possibly much more of the course--may be eliminated because the school needs the space to build more apartments and dormitories.

That's a legitimate priority for the university, which is responding to its dire housing crisis. Yet it seems drastic that solving the housing problem would come at the expense of the golf course, which to golfers is almost as much of an institution as the university is to academics. For those not familiar with it, the first hole at Stanford is special. On the scorecard, it might not look that way--a par 5 of moderate length that doglegs gently to the left. Yet it has one distinguishing trait. You tee the ball up from what feels like a mountaintop. For just one moment, you're the winner.

You take the club back, accelerate through, and there it goes--out into the blue yonder, over traffic down on Junipero Serra Boulevard before finally gently landing in that sweeping fairway--what seems like miles off.

All you non-golfers might think this is pretty silly. But golf leaves very little room for pride. It's an unforgiving opponent. Ever seen us golfers come off the 18th green? It's rare that we're not battered and broken-spirited. We've spent the past four or five hours shanking and scuffing and skulling. Our balls have landed on the sides of hills, in sand and in places we can't reach. We're sweaty, dirty, defeated.

And the Stanford course is among the cruelest.

But at least it has hole No. 1, which provides that one moment of glory.

Larry Horton, Stanford's director of government and community relations, says he regrets that it's come to this. Contrary to popular belief, he said there are very few places on campus where the university can build housing. He challenges anyone to prove him wrong.

In fact, one alternative plan suggests possible future relocation of up to six other holes.

This is all very troubling to golfers. The Stanford course, built in 1930, is a beautiful golf course, weaving its way among the oaks, sculpted into the foothills with artistic precision. The back nine stands as

Our Town: Save hole #1 *: ease

Page 3 of 3

one of the toughest sides of golf anywhere, and the course as a whole has long been considered among the top 100 in the country. In the Bay Area, home to some of the nation's most faceless golf courses, Stanford has been a bright beacon.

Attorney Richard Harris, a leader of the 400-member Stanford Golf Club, said the organization intends to fight the proposed changes at every step. The club has set up a Web site (www.savestanfordgolfcourse.com) and will be in attendance next week when the Palo Alto Planning Commission hears about Stanford's housing plans. Several of Stanford's most well-known golf alumni--Tom Watson, Tiger Woods, Notah Begay--have also pledged to write letters in support of hole #1.

Harris, who captained Stanford's golf team when he was a student 30 years ago, said bluntly: "Anybody that knows anything about golf knows that you don't remove the first hole of a golf course."

That sentiment goes not just for golf course members, but also its legions of respectful trespassers.

Marc Igler, a Palo Alto writer, is a former associate editor of the Weekly and a former juvenile-delinquent golfer.

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Wetlands Research Associates, Inc.

August 2, 2000

Santa Clara County Planning Commission Santa Clara County Board of Supervisors 70 West Hedding Street, East Wing 7th Floor San Jose, CA 95110

RE: Stanford Draft Community Plan/GUP Evaluation of DEIR with regard to golf course

Dear Planning Commission and Supervisors,

Please find the enclosed Special Status Species Habitat Assessment of the Stanford Golf Course that our firm prepared. This report documents that there are several significant habitats on the golf course that are being used or have a high potential to be used by 14 special status species. An additional 11 special status species have a potential to use the site. This level of analysis was not provided in the DEIR and therefore makes it difficult for the public and the agencies to adequately review the impacts associated with the proposed project - especially given the significant land-use conversions proposed. Based on my review of the DEIR and the analysis we have provided in the Habitat Assessment, I believe the DEIR is inadequate for the following reasons:

- The high density of special status species found on the golf course demonstrates the important values of the course as wildlife habitat. This level of detail was not provided in the DEIR for the Stanford University Community Plan which brings to question the evaluation of impacts contained within the DEIR. For example, the DEIR states that a significant loss of a particular habitat will only be evaluated if it exceeds 10% of the total habitat within the project area. The DEIR found that no habitat mitigation would be required for the land-use changes. This type of evaluation is totally inadequate when considering the concentration of species that are dependent upon habitats within the golf course area. It also ignores several significant habitat types including the estivation areas for the CTS, woodlands for a variety of bird species, and riparian habitats for wildlife.
- Other than California tiger salamander and breeding raptors, the DEIR fails to evaluate
 the significance of habitat loss for the many other special status species listed in our

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report as occurring within the golf course. This is a serious flaw in that several of these species may only be found within the golf course and therefore any impacts associated with land use changes (shifting from open space to buildings) will have significant impacts on these special status species and must be evaluated under CEQA.

- California red-legged frogs, a federal threatened species, are known from San Francisquito Creek and are a likely inhabitant of the golf course. The California red-legged frog is also a terrestrial species and can migrate substantial distances from riparian corridors. It is likely that it migrates across the golf course to upland sites. If Stanford University were to proceed with any proposal for the conversion of the golf or any part of it in the vicinity of San Francisquito Creek, to some other more highly developed use, the loss of foraging and migrating habitat for the California red-legged frog needs to be evaluated. The DEIR cannot simply claim that no mitigation is required given that the type and intensity of use of this area will change. California red-legged frogs have been found to be compatible with golf courses, but not buildings, parking lots, and intense human activity.
- The proposed mitigation for the CTS are not adequate to address the use of the golf course by CTS. The DEIR asserts that the Stable Site is "poor quality upland habitat" for CTS. However, the DEIR cites no facts in support of this statement, and this is inconsistent with the facts as shown in the accompanying "Special Status Species Assessment of the Stanford Golf Course, "prepared by this office. The habitats within the golf course offer estivation habitat for CTS in near proximity to the breeding pond. The mitigation option proposed by Stanford is inadequate as it fails to contain any performance standard that ponds to be build and areas to be expanded as CTS Management Areas will in fact support CTS. The proposal to simply expand the CTS management zone into existing open space west of Junipero Serra does not guarantee the survival of the population. The proposed Expanded Tiger Salamander Management Area is located west of Junipero Serra and is farther from Lake Lagunita than the estivation habitat located on fairways 1-7 of the golf course. The second mitigation option provides performance standards, but does not provide for guarantees on estivation habitat, an important element of CTS survival. In any event, the golf course appears to provide suitable habitat for CTS because of its proximity to water, oak savannah, and the estivation habitat created by California ground squirrels. In addition, CTS may use the seasonal drainage as a migration corridor from Lake Lagunita to estivation habitat located on the golf course. In any event, the golf course appears to provide as good or better CTS habitat than the western half of the CTS Management Zone and the proposed expansion
- The DEIR does not provide mapping or acreage of wetland areas threatened by development with the proposed project area. Therefore, it is not possible to determine the level of impact to these important resources, some of which are located within the golf course area. The DEIR merely delays any description or determination of the level and location of mitigation to another agency. Such a delay is in violation of CEQA in that

all mitigation must be explicitly described for the public during the CEQA review process. In addition, the level of impact to jurisdictional wetlands is necessary in order to determine the type and probability of a successful permit approval by the Corps and Regional Water Quality Control Board.

The large oak forests on the Golf Course to the east of Junipero Serra, located between fairways 5, 6, and 7, would be potentially threatened by a course redesign occasioned by housing development of fairway 1. However, the DEIR does not contain a routing plan of the redesigned golf course. Furthermore, the DEIR's proposed mitigation for the loss of oak trees, is inadequate, in that the planting of seedlings or young trees on a grassland to the west of Junipero Serra does not effectively mitigate the loss of a century-old oak forest. These vegetation communities are considered sensitive by the California Department of Fish and Game, and any loss of these communities is considered a significant impact.

I believe that a more thorough analysis of the habitat values associated with the golf course would determine that the proposed use for development is not an environmentally superior alternative. Such development should be located elsewhere in a less sensitive habitat area.

Sincerely yours,

Michael Josselyn, PhD

Acchael Gosselyn, PhD

Principal

SPECIAL STATUS SPECIES HABITAT ASSESSMENT OF THE STANFORD GOLF COURSE PALO ALTO, SANTA CLARA COUNTY, CALIFORNIA

Prepared for:

Committee to Save the Stanford Golf Course c/o Erskine and Tulley 220 Sansome Street, Suite 600 San Francisco, CA 94104

Prepared by:

Wetlands Research Associates, Inc. 2169 East Francisco Blvd., Suite G San Rafael, CA 94901 (415) 454-8868 Contact: Mike Josselyn or Mary Harrison

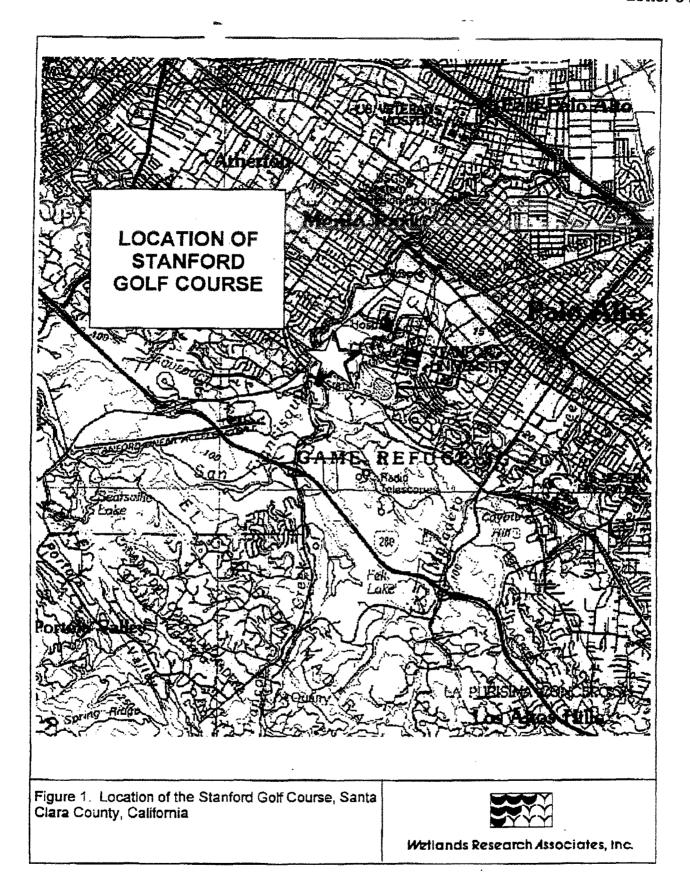
INTRODUCTION

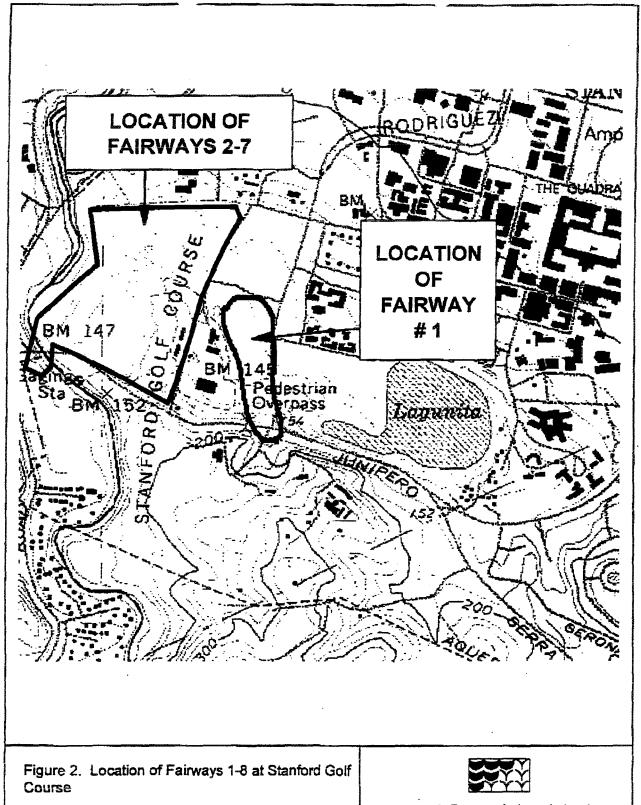
On July 24, 2000 Wetlands Research Associates, Inc. completed an assessment of a portion of the Stanford Golf Course in Palo Alto, California (Figure 1) to determine habitat suitability and subsequent likelihood of the occurrence of special status wildlife species potentially occurring in western Santa Clara County. Special status species are those plants and animals that have been formally listed or proposed as endangered or threatened, or are candidates for listing under the federal Endangered Species Act (ESA) or the California Endangered Species Act. Listed and proposed species are afforded protection under these acts. California Department of Fish and Game (CDFG) Species of Special Concern are also treated as special status species. Species of Special Concern are those that face extirpation in California if current population and habitat trends continue. Although they generally have no special legal status, these species (and federal species of concern) are given management consideration whenever possible. Impacts to these species are considered significant according to the California Environmental Quality Act (CEQA).

The Stanford Golf Course project site is located northeast of the intersection of Campus West Drive and Junipero Serra. The project site encompasses fairways 1-7 of the golf course (Figure 2). Fairway 1 is proposed for relocation for the construction of campus housing. The proposed relocation will involve moving fairway one to the area occupied by fairways 2-7 at the present time. Fairways 2-7 encompass approximately 80 acres and fairway 1 is approximately 15 acres. In addition, fairways 2-7 may also be relocated at some future date under the proposed revisions to the Land Use Plan.

The Stanford Golf Course was constructed in 1929 and opened for play in 1930. The golf course is interspersed by oak woodlands and other natural vegetation that was retained within the golf course design. The Stanford Golf course is a certified member of the Audubon Cooperative Sanctuary Program for golf courses. This program has recognized the steps the Stanford Golf Course has taken to enhance and protect natural areas on the course as well as the importance of these natural areas for plant and wildlife species.

Habitat types on the property include the manicured greens of the fairways, riparian areas, and oak woodland. Riparian areas are located along San Francisquito Creek and a seasonal drainage. San Francisquito Creek flows through the western portion of the golf course, both north and south of Junipero Serra. The length of the riparian corridor for the entire course is approximately 1.6 miles, 0.4 miles of which is located on the portion of the course occupied by fairways 1-7. The riparian area on this portion of the course is approximately 17 acres. The seasonal drainage flows from San Francisquito Creek into Lake Lagunita traversing fairway 7, fairway 6 and fairway 1 of the golf course. Dominant vegetation in the riparian areas includes valley oak (Quercus lobata) and coast live oak (Quercus agrifolia). Other associated species in





Wetlands Research Associates, Inc.

the riparian areas are California buckeye (Aesculus californica), red willow (Salix laevigata) and alders (Alnus sp.). Shrub species include poison oak (Toxicodendron diversilobum), blue elderberry (Sambucus mexicana), and California rose (Rosa californica). Dominant vegetation types in the oak woodland includes valley oak (Quercus lobata), coast live oak (Quercus agrifolia), and California buckeye (Aesculus californica). Understory species consist of a variety of shrubs, grasses and herbs. Approximately 14 acres of old growth oak woodland exists between fairways 5, 6, and 7 as well as 8 acres of oak woodland located between the fairway 7 and Junipero Serra. Other oak woodland or oak savannah habitats are interspersed throughout the fairways 1-7 and occupy approximately 20 additional acres.

METHODS

Prior to the site visit, the CDFG Natural Diversity Data Base (CDFG 2000) and other CDFG lists and publications (Jennings and Hayes 1994; Zeiner et al. 1990) were reviewed to determine documented or potential presence of special status wildlife in Santa Clara County. Habitat suitability on the site was assessed based on a list of species generated by this literature review. The site was traversed on foot on July 24, 2000 to determine if existing conditions provided suitable habitat for special status species. All wildlife observed were noted.

RESULTS

Several special status plant and animal species have been documented to occur, or potentially occur, in western Santa Clara County. Table 1 summarizes the potential of occurrence of these species on the Stanford Golf Course. A search of the CDFG Natural Diversity Database found documented occurrences of California Tiger Salamanders (a federal candidate for listing under the ESA) in Lake Lagunita and surrounding areas on the Stanford University Campus (Appendix A). In addition, it has been reported that CTS have been observed on fairway #1 of the golf course as well as the area of the driving range (Harris, pers. comm.). Lake Lagunita is located in close proximity to the Stanford Golf Course and is part of Stanford University's California Tiger Salamander Management Zone (Figure 3). This management agreement was entered into by the County of Santa Clara, the California Department of Game and Fish, the U. S. Fish and Wildlife Service, and Stanford University.

A total of 17 species were observed during the site visit (Table 2). No special status species were observed, however potential habitat is available for several special status wildlife species. Golfers on the Stanford Golf Course have observed 60 bird species to date, of these 60 species, six (10%) are considered special status species. These species include Cooper's hawk (Accipiter cooperi), Sharp-shinned hawk (Accipiter striatus), Northern harrier (Circus cyaneus), White-tailed kite (Elanus leucurus), California thrasher (Toxostoma redivivum), and Bewicks' wren (Thryomanes bewickii). Appendix B provides a list of these species.

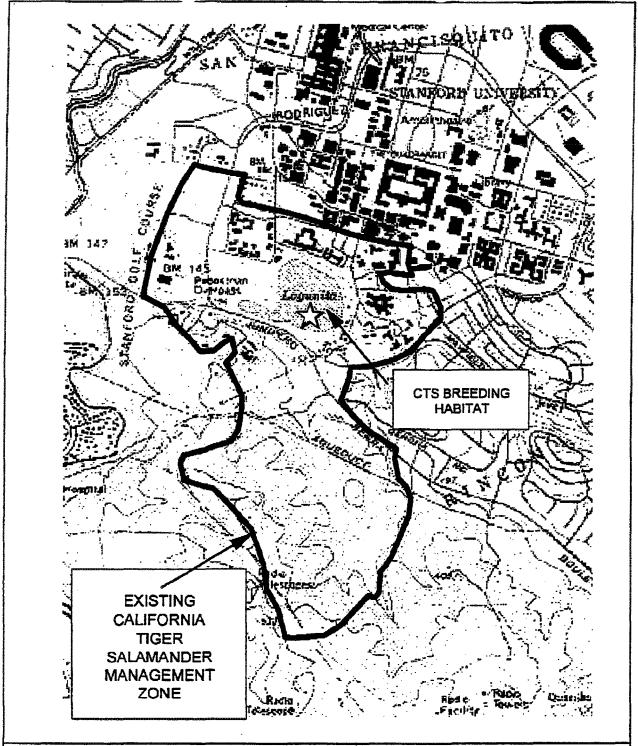


Figure 3. Location of California tiger salamander management zone on Stanford University campus



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CONCLUSION

Based on the results of this assessment, it appears the Stanford Golf Course provides potential suitable habitat for many special status species. California tiger salamanders have been documented on the site and likely use naturalized portions of the golf course as estivation habitat. California tiger salamanders inhabit rolling grassland and oak savannah. Adult salamanders spend most of the year in subterranean retreats, typically rodent burrows, but may be found on the surface during migration to and from breeding sites. Typically breeding occurs in vernal pools and temporary ponds. Numerous road mortalities of salamanders have been documented along the portion of Campus Drive West that lies between the driving range and the first fairway (Figure 4) (Launer and Fee, 1996). This indicates that CTS are moving from Lake Lagunita to estivation habitat located on the Stanford Golf Course during their migratory movements. It is likely that CTS are migrating across the driving range, crossing Campus Drive West, and entering fairway 1. CTS may also use the seasonal drainage as a migration corridor leading from Lake Lagunita to estivation habitat on the course. This drainage crosses beneath Campus Drive West which offers protection from road mortality. California ground squirrels are abundant in the naturalized areas of fairways 1-7 and have created suitable estivation habitat for CTS. Specific estivation areas include the areas of fairway 1 that support ground squirrel populations, such as the oak woodland interspersed throughout the fairway and the woodland bordering the seasonal drainage (Figure 5). In addition, suitable estivation habitat is present in the stable area and the large oak woodland located between fairways 5, 6, and 7 as this woodland supports an abundance of California ground squirrels.

Development of the first fairway would create another barrier to CTS migratory movements from breeding habitat to estivation habitat, as well as eliminate estivation habitat that is present on the site. Barriers to dispersal can significantly threaten the persistence of a CTS population. Disturbance in this area may force salamanders to alter their migratory movements, possibly forcing more of them to cross Junipero Serra Road while searching for suitable estivation habitat. Junipero Serra is a source of heavy road mortality for CTS (Launer and Fec, 1996). In addition, development of the first fairway could lead to "take" of estivating salamanders. Take, as defined by the ESA means "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action." The loss of CTS habitat at Stanford and the potential loss of individuals due to direct mortality or reduction in reproductive success are considered significant impacts of the project as defined by CEQA. The Management Agreement entered into by Stanford University, the U.S. Fish and Wildlife Service, the California Department of Fish and Game and the County of Santa Clara addresses expanding the CTS Management Zone to compensate for loss of habitat due to the construction of campus housing. However, this expansion would involve an addition of land to the west of Junipero Serra which is already designated as campus open space reserve (though this designation does not preclude its development). In addition, the proposed expansion zone is significantly farther away from Lake Lagunita than fairways 1-7 of the Stanford Golf Course and is separated from Lake Lagunita by Junipero Serra, which is a major source of road mortality for CTS (Launer and

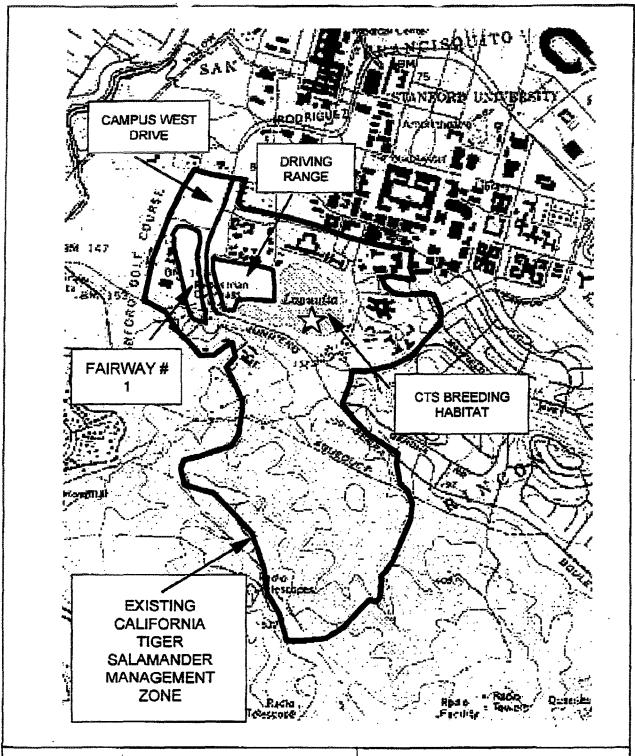


Figure 4. Portion of Stanford University Campus showing CTS Management Zone, location of driving range and the first fairway of Stanford Golf Course, and Campus Drive West.



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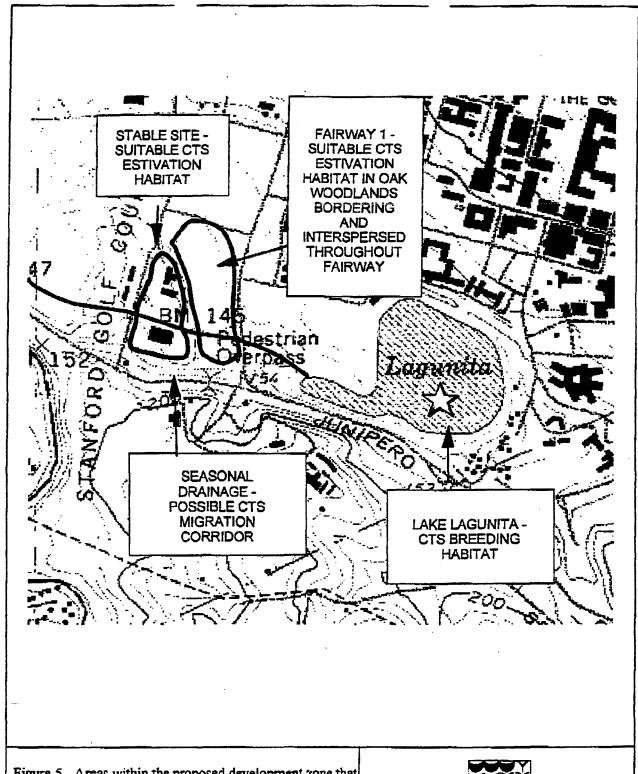


Figure 5. Areas within the proposed development zone that provide suitable CTS estivation habitat and migration corridor.



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Fee 1996). It is questionable if migratory salamanders would utilize this area as estivation habitat due to its distance from breeding habitat, whereas it is evident CTS are using portions of the Stanford Golf Course west of Campus Drive West due to their movement patterns and the mortality associated with Campus Drive West. In addition, the CTS Management Zone does not provide long-term protection for CTS habitat because this zone is not precluded from future development.

In addition to CTS, California red-legged frogs have been found in three locations that are in close proximity to the Stanford Golf Course (Figure 6). One population has been found west of the golf course in San Francisquito Creek. This creek provides suitable habitat for California red-legged frogs and it is possible they occur in the portion of the creek that flows through the golf course. California red-legged frogs are a federally threatened species and a California Species of Special Concern. They are typically found in areas of deep water with dense, emergent shrubby vegetation. They have been known to disperse long distances after larval development. The U. S. Fish and Wildlife Service requires a 300 foot buffer zone be established around riparian areas containing California red-legged frog habitat. Surveys for California red-legged frogs are required prior to construction in any area within the range of the frog, or when frogs have been found within five miles of the project boundaries.

The naturalized areas of the course support a diversity of avian fauna that would be adversely impacted by development of this area by means of a loss of foraging and breeding habitat. Numerous raptor species as well as other special status birds have been sighted on the Stanford Golf Course, and it is possible that some nest on the course. The course appears to be an important stopover point in the Pacific flyway for migrating birds. In addition, relocation of fairway #1 to the area of the course west of the stables could involve fragmentation or loss of the large old-growth oak forest that exists between fairways 5, 6, and 7. This area provides suitable estivation habitat for CTS, nest sites for cavity nesting birds, raptors and other avian species. In summary, the Stanford Golf Course provides excellent habitat for numerous species of birds and other wildlife and relocation of fairway 1 will adversely impact California tiger salamander, could have significant adverse impacts on the California red-legged frog. In addition, numerous bird species, some of which are special status species, will be adversely impacted by the loss of habitat associated with the redesign of the Stanford Golf Course.

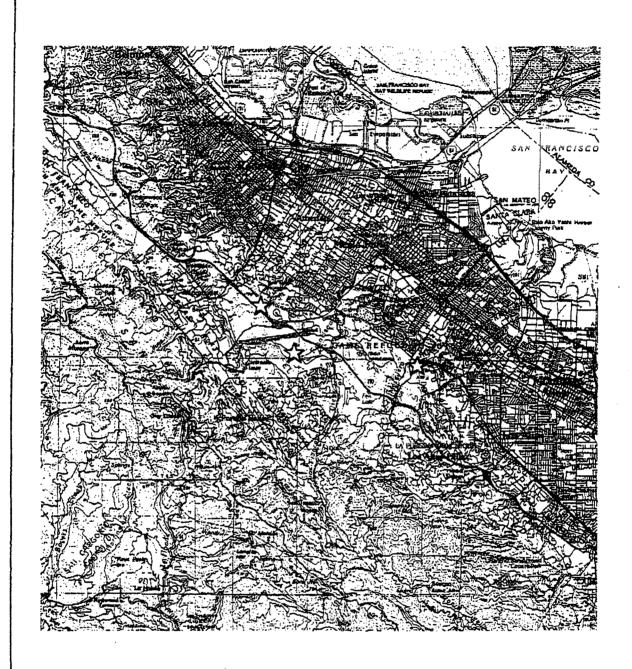


Figure 6. Location of California red-legged frog occurrences within the USGS Palo Alto Quadrangle.



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Table 1. Special status wildlife species of western Santa Clara County that may occur, or are known to occur in habitats similar to those found on the Stanford Golf Course. List compiled from the California Department of Fish and Game (CDFG) Natural Diversity Data Base search of the Palo Alto quad and a review of other CDFG lists and publications.

SPECIES	Status	Habitat	Potential for occurrence
INVERTEBRANCS			
Bay checkerspot butterfly Euphydryas editha bayensis	TT.	Restricted to native grasslands on outcrops of serpentine soil in the vicinity of San Francisco Bay.	Low potential. Suitable habitat is present in open space areas adjacent to golf course, butterflies may occur as visitors to the course.
Steelhead-Cent Coast ESU Onchorhynchus mykiss	FT	Found from Soquel Creek north to the Russian River.	High potential. San Francisquito Creek provides suitable habitat.
California tiger salamander Ambystoma californiense	FC, CSC	Associated with annual grasslands, needs underground refuges and seasonal water sources such as vernal pools for breeding.	Present. Salamanders have been documented in Lake Lagunita and annual grassland in surrounding areas on campus. In addition, road mortalities have been documented on Campus Drive West.
California red-legged frog Rana aurora draytonii	FT, CSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation.	High potential. Suitable habitat is present in San Francisquito Creek.
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Western pond turtle Clemmys marmorata	FSC	Ponds, marshes, rivers, streams, and irrigation ditches with aquatic vegetation and basking sites.	Low potential. Present in Lake Lagunita on the Stanford Campus, but suitable habitat is not present on the golf course.
San Francisco garter snake Thamnophis sirtalis tetrataenia	FE, SE	Occurs in aquatic habitats in San Mateo county. Prefers dense cover and water depths of at least one foot.	Absent. No suitable habitat on site.

Table 1. Special status wildlife species of western Sama Clara County that may occur, or are known to occur in habitats similar to those found on the Stanford Golf Course. List compiled from the California Department of Fish and Game (CDFG) Natural Diversity Data Base search of the Palo Alto quad and a review of other CDFG lists and publications.

BROSS			
Cooper's hawk Accipiter cooperi	csc	Generally associated with woodland habitats, especially riparian areas and dense stands of live oak.	Present. Species has been observed on site (Templin, pers. comm.). May forage on site and suitable nesting habitat is present along San Francisquito Creek and wooded drainage on site.
Sharp-shinned hawk Accipiter striatus	CSC	Generally associated with woodland habitats, prefers riparian areas.	Present. Species has been observed on site (Templin, pers. comm.). May forage on site and suitable nesting habitat is present along San Francisquito Creek and wooded drainage.
Golden eagle Aquila chrysaetos	FSC	Open grassy hilltops and open spaces in blue oak/digger pine woodlands.	Low potential. May forage on site, but limited amount of suitable nesting habitat is present.
Northern harrier Circus cyaneus	CSC	Forages in open to herbaccous stages of many habitats. Nests on ground in shrubby vegetation, usually near wetlands.	Present. Species has been observed on site (Templin, pers. comm.). May forage on site and suitable nesting habitat is present along San Francisquito Creek.
White-tailed kite Elanus leucurus	CFP	Forages in open to herbaceous stages of many habitats. Nests in shrubs and trees adjacent to grasslands.	Present. May forage on site, and may nest in wooded areas of course and margins of creek and drainage.
Merlin Falco columbarius	CSC	Uses many habitats in winter and migration. Frequents open grasslands, wetlands, edges, and early successional stages.	Low potential. May forage on site, but limited amount of suitable nesting habitat is present.

Table 1. Special status wildlife species of western Santa Clara County that may occur, or are known to occur in habitats similar to those found on the Stanford Golf Course. List compiled from the California Department of Fish and Game (CDFG) Natural Diversity Data Base search of the Palo Alto quad and a review of other CDFG lists and publications.

lists and publications.			
Prairie falcon Falco mexicanus	CSC	Distributed from annual grasslands to alpine meadows, but associated primarily with perennial grasslands, savannahs, and rangeland.	Low potential. May forage on site, but no suitable nesting habitat is present.
Peregrine falcon Falco peregrinus	FE, SE	Forages in many habitats; requires tall cliffs or buildings for nesting.	Low potential. May forage on site, but no suitable nesting habitat is present.
Burrowing owl Athene cunicularia hypugea	CSC	Nests and forages in low-growing grasslands that support burrowing mammals. May also use artificial structures for roosting and nesting.	Moderate potential. Suitable burrows are present on some portions of course.
Allen's hummingbird Selasphorus sasis	FSC	Found in coastal scrub, valley foothill hardwood, and valley foothill riparian habitats.	Moderate potential. Suitable habitat is present in riparian areas on site.
Pacific-slope flycatcher Empidonax difficilis	FSC	Widespread in warm moist woodlands, including valley foothill and montane riparian.	Low potential. Limited amount of suitable habitat on site.
California horned lark Eremophila alpestris actio	CSC	Nests and forages in short grass prairie, mountain meadow, coastal plain, fallow fields, and alkali flats.	Moderate potential. Suitable habitat is present on site.
Loggerhead shrike Lanius ludovicianus	FSC, CSC	Prefers open habitats with scattered shrubs, posts, or other perches. Open-canopied valley foothill hardwood and valley foothill riparian.	Moderate potential. May nest in riparian areas on site.
California thrasher Toxostoma redivivum	FSC	Found in moderate to dense chaparral habitats, also found in extensive riparian thickets.	Present. Species has been observed on site (Templin, pers. comm.). Suitable riparian habitat is present.
Bewicks' wren Thryomanes bewickii	FSC	Occurs in chaparral, riparian habitats, and woodland edges.	Present. Species has been observed on site (Templin, pers. comm.). Suitable habitat is present.

Table 1. Special status wildlife species of western Santa Clara County that may occur, or are known to occur in habitats similar to those found on the Stanford Golf Course. List compiled from the California Department of Fish and Game (CDFG) Natural Diversity Data Base search of the Palo Alto quad and a review of other CDFG lists and publications.

Yellow warbler Dendroica petechia brewsteri	CSC	Riparian woodlands, particularly those dominated by willow and cottonwood.	High potential. Suitable habitat is present in riparian areas.
Yellow-breasted chat Icteria virens	CSC	Found in valley foothill riparian habitats, requires willow thickets and other brushy vegetation for cover.	High potential. Suitable habitat is present in riparian areas.
Lark sparrow Chondestes grammucus	FSC	Sparse valley foothill hardwood, open mixed chaparral, brush habitats, and grassland with scattered trees or shrubs.	Moderate potential. Suitable habitat is present.
Greater western mastiff bat Eumops perotis californicus	FSC, CSC	Cliff crevices, cracks in boulders, and buildings are used for roosting.	Low potential. Limited suitable roosting habitat.
Fringed myotis Myotis thysanodes	FSC	Caverns, trees, and buildings provide suitable roost habitat.	High potential. Suitable roost habitat is present in riparian areas and in trees on course.
Pallid bat Antrozous pallidus	CSC	Rock outcrops, caverns, hollow trees, buildings, and bridges provide suitable roost habitat.	High potential. Suitable roost habitat is present in riparian areas, trees, and bridge over San Francisquito Creek.
Yuma myotis Myotis yumanensis	FSC, CSC	Buildings, trees, mines, caves, bridges and crevices.	High potential. Suitable roost habitat is present in riparian areas, trees, and bridge over San Francisquito Creek.

Key to Status Codes:

FE	Pederal Endangered
FT	Federal Threatened
FC	Federal Candidate for Listing
FSC	Federal Species of Concern
SE	State Endangered
ST	State Threatened
CFP	CDFG Fully Protected Species
CSC	CDFG Species of Special Concern

Table 2. Wildlife species observed at the Stanford Golf Course during a habitat assessment conducted on July 24, 2000.

Common name	Scientific name	Seasonal Status	Comments
American robin	Turdus migratorius	resident	Several individuals observed throughout the course.
California towhee	Pipilo crissalis	resident .	Observed throughout course in trees.
Scrub jay ·	Aphelocoma coerulescens	resident	Numerous individuals observed throughout course.
Red-tailed hawk	Buteo jamaicensis	resident	Observed flying east of driving range near drainage.
House finch	Carpodacus mexicanus	resident	Observed throughout course in trees.
Red-shouldered hawk	Buteo lineatus	resident	Observed perched on a post east of driving range near drainage.
Oak titmouse	Parus inornatus	resident	Observed throughout course in trees.
Barn swallow	Hirundo rustica	resident	Numerous swallows observed forzging over the greens of the course.
Acorn woodpecker	Melanerpes formicivorus	resident	Numerous individuals observed in trees on fairways and in naturalized areas between fairways.
Black phoebe	Sayornis nigricans	resident	Numerous individuals observed throughout the course foraging on the greens.
Western bluebird	Sialia mexicana	resident	Several observed foraging on the greens of the course.
Northern mockingbird	Mimus polyglonos	resident	Numerous individuals observed throughout course.

Table 2. Wildlife species observed at the Stanford Golf Course during a habitat assessment conducted on July 24,

Mourning dove	Zenaidura macroura	resident	Numerous individuals observed throughout
Chestnut-backed	Parus rufescens	resident	course. One observed in oak tree
chickadec		•	in naturalized area of course.
California ground squirrel .	Spermophilus beecheyi	resident	Many squirrels observed in naturalized areas between fairways and in stable area.
Mule deer	Odocoileus hemionus	resident	Observed two in drainage south of driving range.
Domestic rabbits	Sylvilagus spp.	resident	Observed two west of fairway #1 in area of stables.

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- Zeiner, D. C., W. F. Laudenslayer, Jr., K. E. Mayer, and M. White. 1990. California's Wildlife Volume I-III: Amphibians and Reptiles, Birds, Mammals. California Statewide Wildlife Habitat Relationships System, California Department of Fish and Game, Sacramento.

Appendix A

CDFG Natural Diversity Data Base California Tiger Salamander occurrences in the USGS Palo Alto quadrangle

CDFG Natural Diversity Data Base California Red-legged Frog occurrences in the USGS Palo Alto quadrangle

Palo Alto Quad - Amphibians

AMBYSTOMA CALIFORNIENSE CALIFORNIA TIGER SALAHANDER Element Code: AAAAA01147 Federal: Endangered Other Lists MDDB Element Ranks Global: G2G3 CDFG Status: SC State: None State: 5253 Let/Long: 37°25'21° / 122°10'34° UTM: Zone-10 N4141853 E572901 Precision: SPECIFIC Symbol Type: POLYGON Occurrence No. 63 Occ Renk: Good Map Index: 32863 -Dates Last Seen-Township: 06S Range: 03W Element: 1999-06-15 Origin: Natural/Native occurrence Presence: Presumed Extant Section: XX Otr XX Site: 1999-06-15 Meridian: M Trend: Stable
Hain Source: LAUNER, A. E. 1998 (DBS)
Quad Summary: PALO ALTO (3712242/4288)
County Summary: SANTA CLARA Elevation: 150 ft Area: 28.7 ac SNA Summary: Location: LAKE LAGUNITA AND SURROUNDING AREAS ON STANFORD UNIVERSITY CAMPUS, PALO ALTO Comments Distribution: MAINLY LAKE LAGUNITA IS USED FOR BREEDING, ALTROUGH SMALL PONDS SOUTH OF JUNIPERO SERRA ARE ALSO USED.
SURROUNDING UPLAND USED DURING NON-BREEDING PERIODS.
Ecological: SEASONAL RESERVOIR AT BOUNDARY BETWEEN DEVELOPED CAMPUS AND UNDEVELOPED FOOTHILLS. SURROUNDING AREA CONSISTS
OF NON-NATIVE GRASSLAND, OAK VOCOLAND SAVANNA & LANDSCAPED AREAS.
Threat: EARLY LAKE DRAINAGE, ON-GOING CONSTRUCTION, NON-NATIVE SALAMANDERS, BIOCIDES, FERAL CATS, TRAFFIC, ORV'S, BARRIERS General: COLLECTIONS DEPOSITED IN CAS, MVZ, UCD & SU. OBS IN 1966 & 1991-93. 2 AD FOUND HEAR JUNIPERO SERRA BLVD IN 1992. >1000 AD/LARVAE OBS IN 80+ SITE VISITS IN 1997. 75 AD/250+ LARVAE OBS IN 1998. 15 AD/85+ LARVAE OBS IN Owner/Manager: STANFORD UNIVERSITY Lat/Long: 37°25'43" / 122°11'20"
UTM: Zone-10 #4142533 E571774
Precision: HON-SPECIFIC
Symbol Type: POLYGON
Area: 254.9 ac Occurrence No. 77 Map Index:32819 -Dates Last Seen Township: 06\$ Element: 1938-01-03 Site: 1938-01-03 Occ Rank: Unknown
Origin: Natural/Native occurrence Range: 03W Section: 09 Otr XX Presence: Presumed Extant Meridian: M Trend: Unknown Elevation: 75 ft Main Scurce: BRODE, J. 1986 (PERS) Quad Summary: PALO ALTO (3712242/4288) Munty Summary: SANTA CLARA, SAN MATEO SNA Summary: County Location: SAN FRANCISQUITO CREEK, SAN MATED COUNTY. Comments-Distribution: THIS HISTORIC COLLECTION WAS SNAPPED TO AN EXISTING OCCURRENCE ON SAN FRANCISQUITO CREEK. THE EXACT LOCATION OF THIS COLLECTION IS UNKNOWN. Threat: General: MUSEUM SPECIMEN SU #3725. Owner/Manager: UNKNOWN Lat/Long: 37°26'49" / 122°09'29" UTM: Zone-10 N4144577 E574477 Occurrence No. 416 Occ Rank: Unknown Map Index: 28024 -Dates Lest Seen-Element: 1893-11-11 Township: 06\$ Range: U3W Section: XX Qtr XX Origin: Hatural/Native occurrence Site: 1893-11-11 Precision: NON-SPECIFIC Presence: Presumed Extant
Trend: Unknown
Main Source: BRODE, J. 1986 (PERS)
Quad Summary: PALD ALTO (3712242/4288) Symbol Type: PCINT Radius: 1 mile Meridian: M Elevation: 50 ft County Summery: SANTA CLARA, SAN MATEO SNA SUMMERY: Location: PALD ALTO. Comments Distribution: Ecological: General: HUSEUM RECORDS SU# 221-223, 225-227, 229-30, & 232-33 FROM 29 APRIL 1892; SU# 23 FROM 15 APRIL 1893; AND SU# 138-42 FROM 11 NOV 1893.
Owner/Manager: UNKNOWN

Palo Alto Aued - Amphibians

RAMA AURORA DRAYTONII NDDB Element Ranks-Global: G4T2T3 State: S2S3 CALIFORNIA RED-LEGGED FROG List Status Other Lists Federal: Threatened State: None CDF6 Status: SC Element Code: AAABH01022 Habitat Association General: LOULANDS & FOOTHILLS IN OR NEAR PERMANENT SOURCES OF DEEP WATER WITH DENSE, SHRUBBY OR EMERGENT RIPARIAN VEGETATION.
Micro: REQUIRES 11-20 WEEKS OF PERMANENT WATER FOR LARVAL DEVELOPMENT. MUST HAVE ACCESS TO ESTIVATION HABITAT. Lat/Long: 37°24'07" / 122°09'06"
UTM: Zone-10 N4139625 E575071
Precision: NON-SPECIFIC
Symbol Type: PDLYGON Occurrence No. 230 Occ Rank: Good Map Index:38080 -Dates Last Seen-Township: 065 Range: 03V Section: 23 Atr XX Element: 1999-05-08 Site: 1999-05-08 Origin: Natural/Native occurrence Presence: Presumed Extant Meridian: M Trend: Unknown
Nain Source: LAUNER, A. 1997 (OBS)
Qued Summary: PALO ALTO (3712242/4288)
County Summary: SANTA CLARA Elevation: 150 ft Area: 180.2 ac SNA Summary: Location: MATADERO CREEK AND DEER CREEK, PALO ALTO. Distribution: MATADERO CREEK - BETWEEN OLD PAGE MILL BRIDGE AND FOOTHILL BLVD; DEER CREEK - FROM THE MATADERO CREEK CONFLUENCE TO ARASTRADERO BLVD.

ECOLOGICAL: MABITAT CONSISTS OF RIPARIAN, WITH SOME GRAZING AND SOME DEVELOPMENT UPSTREAM.
Threat: THREATS INCLUDE MON-MATIVE FISH, BULLFROGS, CRAYFISH, DUMPING IN QUARRY, BANK EROSION, TRAFFIC, AND ONGOING DEVELOPMENT.

General: 30 Adults/20 Tadpoles Obs, MAR-OCT 1997. 2 Adults Obs on 19 Aug 97. 10+ Adults/15 Tadpoles Obs in 1998. Deer CREEK WAS DRY IN 1997; 5+ Adults/95 Tadpoles Obs, Apr-OCT 1998 (FREE OF CRAYFISH/FISH). 1 JUV FROG OBSERVED ON 8 MAY 1999. Owner/Manager: STANFORD UNIVERSITY, SCVAD Lat/Long: 37°24'34" / 122°13'54" UTM: Zone-10 N4140380 E567998 Precision: NON-SPECIFIC Township: 069 Occurrence No. 231 Map Index:38084 -Dates Last Seer Occ Rank: Good Origin: Natural/Native occurrence Range: U3W Section: 17 Qtr XX Element: 1998-10-XX Site: 1998-10-XX Symbol Type: POLYGON Area: 138.3 ac Presence: Presumed Extant Meridian: M Elevation: 250 ft Trend: Unknown Nain Source: LAUNER, A. 1997 (OBS) Quad Summary: PALO ALTO (3712242/4288) County Summary: SAN MATEO SNA SUMMATY:
LOCATION: SAN FRANCISQUITO CREEK, FROM THE BEAR CREEK CONFLUENCE TO WITHIN 1 MILE OF THE MUY 280 BRIDGE, PALD ALTO. **Comments** Distribution: Ecological: HABITAT CONSISTS OF RIPARIAM; SURROUNDED BY GRASSLAND, AGRICULTURAL FIELDS, AND CAK WOODLANDS.
Threat: THREATS INCLUDE BULLFROGS, ADJACENT LAND USE (AGRICULTURE & EQUESTRIAN FACILITIES), WATER QUALITY, AND DEVELOPMENT. DEVELOPMENT AND 13 TADPOLES OBSERVED BETWEEN 24 JULY AND LATE AUGUST 1997. 16 ADULTS AND 13 TADPOLES OBSERVED DURING 15+ VISITS MADE BETWEEN 1 NAY-LATE OCT 1998. Duner/Manager: STANFORD LANIVERSITY Lat/Long: 37°25'36" / 122°14'12"
UTM: Zone-10 N4142292 E567530
Preciator: SPECIFIC
Symbol Type: POINT
Radius: 80 meters -Dates Last Seen-lement: 1998-08-02 Site: 1998-08-02 Township: 065 Decurrence No. 282 Hap Index: 40565 Range: 03W Section: 07 Gtr XX Occ Rank: Good Origin: Natural/Native occurrence Presence: Presumed Extant Heridian: M Elevation: 230 ft Trend: Unknown Hain Source: JENNINGS, M. 1998 (DES) Quad Summery: PALO ALTO (3712242/4288) County Summery: SAN MATEO Location: WEST OF 1-280, 0.6 MILE SW OF BEAR GUICH RESERVOIR, MODDSIDE. Distribution: SITE IS LOCATED 0.4 NILE NW OF THE END OF LAWLER RANCH ROAD.

Ecological: HABITAT CONSISTS OF A SPRING-FED POND AND INTERMITTENT STREAM, SURRCUNDED BY OAK WOCDLAND.

Threat: THREATENED BY DEVELOPMENT.

General: 1 ADULT COLLECTED (MRJ #1407) ON 2 AUG 1998 AND DEPOSITED AT CAS.

Owner/Manager: PVT

Palo Alto Guad - Amphibians

CALIFORNIA	AYTONII (cont.) RED-LEGGED FROG de: AAABH01022	Federal: Threatened State: None	HDDB Element Ranks Global; G47273 State: S2S3	Other Lists CDFG Status: SC
Presence: Trend: Main Source: Quad Summery: County Summery:	Good Elemen Natural/Native occurrence Sit Presumed Extant University (3712242/4288) Elemen Sit	e: 1998-08-02 Precision: Symbol Type:	Zone-10 W4142118 E568025 SPECIFIC	Township: 06s Range: 03M Section: 07 Gtr IX Meridian: M Elevation: 210 ft
SNA Summary: Location:	WEST OF 1-280, 0.5 MILE SSU OF BEAR	BULCH RESERVOIR, WOODSIDE	0	
Distributions Ecological:	SITE IS LOCATED AT THE OF THE END OF HABITAT CONSISTS OF AN ARTIFICIAL PRINCIPLE SURROUNDED BY OPEN OAK WOODLAND, FOR	NO VEGETATED BY TULES/CAT		THE DAM FACE. SITE IS
Threat:	THREATENED BY DEVELOPMENT. 3 ADULTS AND 5 LARVAE COLLECTED (MR.	•		

Appendix B

List of bird species observed on Stanford Golf Course

Common name

Mallard Wood duck Hooded merganser

Great blue heron
Great egret
Killdeer

California quail
Turkey vulture
American kestrel
White-tailed kite*
Northern harrier*
Sharp-shinned hawk*
Cooper's hawk*
Red-tailed hawk
Red-shouldered hawk

Barn owl

Great horned owl
Anna's hummingbird
Belted kingfisher
Acom woodpecker

Downy woodpecker Hairy woodpecker Northern flicker Nuttall's woodpecker

Black phoebe Tree swallow

Violet-green swallow

Barn swallow American crow Common raven Scrub jay Stellar's jay

Chestnut-backed chickadee

Oak titmouse Bushtit

White-breasted nuthatch Red-breasted nuthatch

Brown creeper

Anas platyrhynchos

Scientific name

Aix sponsa

Lophodytes cucullatus Ardea herodias Casmerodius albus

Charadrius vociferus
Lophortyx californicus

Cathartes aura
Falco sparverius
Elanus leucurus
Circus cyaneus
Accipiter striatus
Accipiter cooperii
Buteo jamaicensis
Buteo lineatus
Tyto alba

Bubo virginianus Calypte anna Megaceryle alcyon

Melanerpes erythrocephalus
Dendrocopos pubescens
Dendrocopos villosus
Colaptes auratus
Picoides nuttallii
Sayornis nigrans
Iridoprocne bicolor
Tachycineta thalassina
Hirundo rustica

Corvus brachyrhynchos

Corvus corax

Aphelocoma coerulescens

Cyanocitta stelleri
Parus rufescens
Parus inornatus
Psaltriparus minimus
Sitta carolinensis
Sitta canadensis
Certhia familiaris

Bewick's wren# Mockingbird California thrasher* American robin Western bluebird European starling Cedar waxwing Yellow-rumped warbler Brewer's blackbird Red-winged blackbird Western meadowlark White-crowned sparrow Golden-crowned sparrow Rufous-sided (Spotted) towhee California towhee Dark-eyed junco House finch Lesser goldfinch House sparrow

Passer domesticus

Thryomanes bewickii Mimus polyglottus Toxostoma redivivum Turdus migratorius Sialia mexicana Sturnus vulgaris Bombycilla cedrorum Dendroica auduboni Euphagus cyanocephalus Agelaius phoeniceus Sturnella neglecta Zonotrichia leucophrys Zonotrichia atricapilla Pipilo erythrophthalmus Pipilo crissalis Junco hyemalis Carpodacus mexicanus Carduelis psaltria

^{*} indicates special status species

A Plea to Preserve the Existing Stanford University Golf Course Lands in Open Space to Ensure Biodiversity for the Region

by Fred Templin and Dr. David E. Wilkins

This package consists of the following elements:

- Position statement
- Exhibit A: the Audubon Conservation Report (hardcopy only)
- Exhibit B: Stanford Golf Course Bird List
- Exhibit C: Wildlife and Threatend Species (hardcopy only)
- Exhibit D: Golf Course Walkthrough Report, July 24, 2000.
- Exhibit E: Bluebird Nesting Report for 2000. (hardcopy only)

Position statement

The Stanford University Golf Course provides prime habitat for a wide variety of wildlife, including numerous species of birds, mammals, fish, reptiles and amphibians. The golf course has been so recognized by its acceptance in the Audubon Cooperative Sanctuary Program for Golf Courses sponsored by Audubon International. In its conservation report on the Stanford University Golf Course (see Exhibit A: Audubon Conservation Report), Audubon International states that:

"The woods, wetlands, stream and creek on the property already provide valuable food, cover, and water sources as illustrated by the variety of wildlife, such as jack rabbits, great homed owls, bluebirds, and the California newt, seen at the course. These areas can form the core of your cooperative sanctuary. You are also fortunate to be bordered by additional woodlands. This larger habitat area allows you to attract wildlife that need a greater amount of space to survive. Furthermore, your location along the Pacific flyway, the major west coast bird and migration route, places you in an excellent position to attract many species of migrating birds.

Based on your information, it appears that Stanford University Golf Course has already undertaken several important wildlife and habitat enhancement projects. We commend you for beginning projects such as mounting next boxes, providing snags (dead trees standing), leaving woodland understory, naturalizing non-play areas and providing corridors for salamander access to reproductive sites. We were also impressed with the fact that out of 160 acres, only 85 acres are in-play turf grass. This allows you to provide valuable "open space" and habitat for wildlife."

In this report, we will limit our discussion to the wild birds supported by the golf course. This habitat also supports many mammal species, including fox, coyote, deer, jack rabbit, and two threatend species, the red legged frog and tiger alamander. Another report is being prepared on the latter.

The critically-important golf course habitat supports one of the most abundant and biodiverse populations of wild birds in the region (see Exhibit B: Stanford Golf Course Bird List and Exhibit D: Golf Course Walkthrough Report.). To date, 60 different birds species have been reported on the golf course premises, with numerous others awaiting discovery. Particularly sensitive habitat areas for wild birds on the golf course premises include:

- Nesting habitat for tree cavity nesters, especially the abundant population of Western Bluebirds on the golf course. Cavity nesting options include:
 - O natural cavities in dead trees excavated by woodpeckers
 - O a nesting box trail maintained by environmental advocates (see Exhibit D: Bluebird Nesting Report)
- Mature oak woodlands bordering fairways and native grasslands (with abundant ground squirrel
 and rodent populations) that provide prime hunting opportunities for nearly all raptor species
 present in the bay area.
- An untouched riparian corridor bordering San Francisquito Creek which provides crucial stop-over habitat for migratory waterfowl and songbirds.

But, the golf course habitat areas are not a closed system (like a zoo) in which wild birds seen on the golf course remain on the premises and go nowhere else.

Instead, the golf course provides crucial habitat not only for year round resident birds, but also for those that migrate locally throughout the surrounding open space areas and for long range migrants which use the golf course habitat as a stopover point along the Pacific Flyway seasonal migration routes. Indeed, the golf course habitat and surrounding open spaces are in symbiotic relationship with one another; one cannot be viewed separately from the other in terms of the biodiversity of the region. Additionally, the golf course habitat provides a crucial link in the chain for a number of seasonal migrants; without this link, the environmental impact for certain species might be felt along the entire Pacific Flyway. We provide a few examples to illustrate the above points.

Western Bluebirds

As a case in point, the golf course premises holds the one of the most abundant populations of Western Bluebirds in the bay area. This is due to the nesting box efforts of environmental advocates and the availability of natural tree cavity nesting sites on the golf course premises; especially along the first 7 holes. Without this crucial habitat, the Western Bluebirds would not be present. Although the Santa Clara Valley Audubon Society does sponsor a "bluebird trail" in the open spaces adjoining the golf course, we believe the nesting sites on the golf course are preferred due to the excellent insect hunting opportunities provided by the short fairway grasses and availability of nesting materials found in the native grasses bordering the fairways. But, Western Bluebirds make local seasonal migrations, so it is very likely that many of the birds seen on the golf course during the nesting season are among the birds seen in the open spaces during the winter rainy season. Without the prime habitat available on the golf course premises, the population of western bluebirds for the entire region would undoubtedly suffer.

Hawks

The hawk species seen at the golf course including Red Tailed, Red Shouldered, Coopers, Sharp-Shinned, Northern Harrier, Black Shouldered Kite, American Kestrel (and possibly even an occasional Peregrine Falcon or Golden Eagle, though none have been confirmed to date) clearly do not spend their entire existence on the golf course premises. Instead, many of these are the same birds seen soaring over the campus, the open spaces in the vicinity of the Stanford dish, and along the foothills adjacent to highway 280. Without the prime hunting grounds provided by the golf course habitat, populations for the surrounding areas would clearly be impacted as well.

Hooded Mergansers and Wood Ducks

As a final example, both Hooded Mergansers and Wood Ducks have been reported in the section of San Francisquito Creek east of Junipero Serra Boulevard during the migration seasons. These ducks do not remain on the golf course property year round, but use the riparian corridor as a stop-over point during their annual migrations. Without the riparian corridor preserved by the golf course, especially the portion east of Junipero Serra, a crucial link in the migration chain along the Pacific Flyway for such birds would be lost.

Conclusion

We re-emphasize the fact that the wildlife habitat present on the golf course premises supports not only year-round resident species, but also provides seasonal habitat for species that migrate locally throughout the open spaces and long range migrants which travel along the Pacific Flyway. Additionally, much of this habitat has been in place since the golf course was created 70 years ago and is thus a long-established and fundamental element of the regional ecosystem. Therefore, the potential impact for regional biodiversity that may result from the loss of this habitat would be impossible to quantify a priori, but would quite likely be devastating in many instances. We urge the board to preserve the existing Stanford University Golf course lands in open space so that such impact need never be assessed.

David E. Wilkins wilkins@ai.sri.com
Last modified: Mon Jul 31 19:34:36 2000

Audubon Conservation Report

Audubon Cooperative Sanctuary Program for Golf Courses

Stanford University Golf Course Stanford, California 9/96

Overview

The Stanford University Golf Course has an excellent opportunity to become a successful cooperative sanctuary by providing valuable wildlife habitat and educating golfers about environmental management on the golf course. We appreciate your commitment to preserving and restoring natural habitats and carefully using resources to prevent pollution and depletion. By joining with other cooperators in the Sanctuary System, your efforts are helping to enhance, protect, and connect wildlife habitat and resources across the country. As a cooperator, we hope to help you achieve your goal of enhancing wildlife habitat while creating a balance between the needs of golfers and wildlife.

Environmental Assessment

This section provides an assessment of course assets and concerns and provides general direction for conservation projects in each of the ACSP certification categories. Also included are ideas for suggested projects within each of the categories. All information on how to implement these projects is included in your Conservation Report packet. Please refer to the <u>Guide to Managing a Cooperative Sanctuary</u> and <u>Environmental Reports</u> for additional project implementation information.

Wildlife and Habitat-The woods, wetlands, stream and creek on the property already provide valuable food, cover, and water sources as illustrated by the variety of wildlife, such as jack rabbits, great horned owls, bluebirds and the California newt, seen at the course. These areas can form the core of your cooperative sanctuary. You are also fortunate to be bordered by additional woodlands. This larger habitat area allows you to attract wildlife that need a greater amount of space to survive. Furthermore, your location along the Pacific flyway, the major west coast bird migration route, places you in an excellent position to attract many species of migrating birds.

Based on your information, it appears that Stanford University Golf Course has already undertaken several important wildlife and habitat enhancement projects. We commend you for beginning projects such as mounting nest boxes, providing snags (dead trees standing), leaving woodland understory, naturalizing non-play areas and providing corridors for salamander access to reproductive sites. We were also impressed with the fact that out of 160 acres, only 85 acres are inplay turf grass. This allows you to provide valuable "open space" and habitat for wildlife.

An important part of California's natural bentage is the "Oak Woodland" community in which your course is located. We are pleased to know that you are helping to preserve the plants and wildlife of this unique area by incorporating native plant species high in wildlife value as you landscape. Enhancing wildlife habitat through naturalizing areas and focusing on planting native vegetation will also help minimize habitat altered or lost due to the possible expansion of an additional eighteen hole course on the property.

2

You included a few endangered and threatened species on your wildlife list. As you probably know, these species are listed as endangered and threatened because there are so few of them left. We are only beginning to learn the impacts of the loss of a species. When a species becomes extinct, not only is the species gone, but the biological diversity of the world is lessened. This biological diversity is what maintains the balance of all healthy ecosystems. For this reason, we encourage you to continue to provide habitat for endangered and threatened species and minimize any impacts from the course that may effect them. We also suggest that you contact the California State Department of Fish and Wildlife to learn more about preserving the habitat of these species, as well as the species themselves. The Stanford University Golf Course should take pride in contributing to the survival of these species.

Since you indicated an interest to learn more about songbirds, we recommend that you purchase a field guide which provides information on identification as well as behavior of birds. Enclosed is a fact sheet entitled "A Guide to Field Guides" that will assist you in your selection.

Recommended Projects - Wildlife & Habitat Management:

- Naturalize additional acreage
- Create wildlife "corridors" between habitat areas
- Plant flowers for hummingbirds, butterflies and songbirds
- Begin a wildlife inventory
- Add shoreline vegetation to water features where possible
- Integrated Pest Management- Having a comprehensive IPM program in place is one of the most important ways to ensure a healthy environment for both people and wildlife. We commend you for scouting regularly, using natural organic fertilizers and incorporating pest tolerant turf grasses on the course.

Your IPM program could be further developed by researching other possible biological controls and using written records of pest and disease activity to determine problem threshold levels (ie. 5-10 grubs = no treatment; 15-20 = problem = treatment). This information will help you better determine how, when, and if a problem needs to be treated. Also keep track of chemical and cultural control measures used. These records will enable you to choose the most appropriate control measure and evaluate the success of your IPM program. Finally, be sure to educate golfers about IPM since posticide use is such a common environmental concern and pressure for excellent conditions so often jeopardizes IPM.

Recommended Projects - Integrated Pest Management:

- Set threshold levels for disease and insect injury
- Incorporate biological controls such as Bt, beneficial nematodes, and traps
- Mount bat houses to attract bats
- Mater Quality and Conservation- Water use and quality are two of the greatest concerns facing golf courses. We are pleased to know that you have undertaken several conservation measures that are helping to ensure judicious use. In addition, the wetlands, stream and creek on the course make maintaining good water quality and reducing nutrient loading and runoff of central importance. By establishing vegetative buffers around water sources, this enhances water quality since buffers filter runoff and reduce erosion as well as provide wildlife habitat. From your photographs, it appears that

buffers are substantial along the creek edges. Especially with your concern for water quality on the course, continue to look for places where aquatic or shoreline plantings could be added or extended along the stream, creek and wetland edges. In addition, look also at any threats posed by the maintenance facility.

Recommended Projects - Water Conservation and Water Quality Management:

- Mulch landscape plantings and garden areas
- Improve aquatic habitat and reduce nutrient inputs around water features by planting shoreline vegetation
- Discourage golfer activity and avoid heavy maintenance in and around wetlands
- Evaluate maintenance area for actual or potential water quality problems
- E Outreach and Education-Often, the long-term success of conservation and wildlife management projects depends upon educating people about these efforts. Stanford University Golf Course has taken significant action in this area by informing the community of your environmental program through the local press as well as your newsletter, and by involving volunteers in the nest box program and removal of non-native vegetation on the property. In addition, your working with the Stanford's Environmental Planning Office and Canter for Conservation Biology is an excellent asset for information and assistance. Your participation in the ACSP can be another way for telling people about the positive things you do and soliciting additional help and support.

Recommended Projects - Outreach & Education:

- Display your registration certificate and other ACSP information
- Host wildlife walks or habitat tours
- Mount educational signs in naturalized areas

How To Proceed

We recommend that you take the following steps to implement the recommended projects, create a successful golf course sanctuary, and apply for ACSP certification:

- Step 1: Let people know you're an ACSP member- To help you announce your participation in the ACSP, we have written a press release for your course. Feel free to send it to local media that your course deems appropriate or simply use it in your newsletter.
- Step 2: Form a Resource Advisory Group- Gather a small working group of interested employees, regular golfers or members, and representatives of local groups with expertise in wildlife or plants to help you formulate plans and implement projects.
- Step 3: Develop an Environmental Plan and Complete the "Environmental Planning Certification Form"- Included in this packet is a form to help you outline your environmental plan. The form includes a checklist of projects that you can do to become certified in each category (Wildlife Habitat Management, Outreach and Education, Integrated Pest Management, Water Conservation,

4

and Water Quality Management). Once you have determined your plan-of-action, send us your completed Environmental Planning Form. We'll review it, discuss any concerns with you, and send you a "Certificate of Recognition" in Environmental Planning.

Step 4: Implement Your Plan- Choose several basic projects to begin or expand your conservation efforts and assign tasks to staff and resource committee members. This will help to ensure golfer support and successful results.

Step 5: Apply for Certification in the Five Remaining Categories- After you receive certification in Environmental Planning, you can then apply for certification in the remaining five categories. When we receive your Environmental Plan, we will send you the Certification Workbook so that you can apply for certification when your plans in the remaining categories have been implemented. The Certification Workbook includes questions covering the information required for certification in the remaining five categories (Outreach and Education, Wildlife and Habitat Management, Integrated Pest Management, Water Conservation, and Water Quality Management).

Audubon Information. Support and Guidance

We are available to provide additional information, support, and guidance to help you implement ACSP projects. If you have questions or need more information, feel free to call us. Also remember that your experiences, both positive and negative, may be very helpful to other golf courses involved in the Cooperative Sanctuary System. If you are encountering problems with your management efforts, we'd like to know that too. Cooperative Sanctuary staff are in the office on weekday's from 9 a.m. to 5 p.m.

Thanks for your commitment to environmental quality. We look forward to hearing about your progress at Stanford University Golf Course.

EXHIBIT "A"

Hazardous Material Storage and Use

a) Fuel Storage - Leaking underground tanks have been a problem for many golf courses. Soil and groundwater contamination can be extremely damaging.

Our situation: We have shifted our fuel storage to double walled above ground tanks which minimize the potential for leakage and environmental contamination. Welding gas cylinders are separated and stored upright and chained.

b) Chemical Storage - Golf courses use many hazardous chemicals for equipment maintenance, cleaning, and painting. These materials must be used properly and stored safely in their proper containers.

Our situation: We have a separate storage room for oils and lubricants which has secondary containment to prevent spills. Used oil and filters are saved and recycled. Employees are trained on hazardous materials and their right to know issues. Paints are stored in a specific locker outside of the building. Used batteries are saved and are recycled. Anti-freeze is also saved for disposal. Brake work is done so that any aspectos fibers are not discharged into the air.

c) Fertilizer and Pesticide Storage and Use - Fertilizers are used extensively in golf course maintenance. Some fertilizers are very soluble and can find their way to ground or surface water easily. Pesticides are used in a much smaller volume but tend to be more acutely toxic to organisms. Both of these products should be stored in locked, well ventilated, covered enclosures. These enclosures should be separate from the regular maintenance buildings. Pesticide use is a concern. It is very difficult at a busy facility to apply pesticides without goifers nearby.

Our situation: Fertilizers and pesticides are stored in locked individual rooms in the old stable maintenance building. The liquid pesticides do have secondary containment. But this building is very problematic. The roof leaks and rain water often soaks fertilizer bags. This building is also used for equipment storage and other maintenance activities. If a fire would happen to occur, the fire department would let the building burn possibly ruining expensive maintenance supplies and equipment. Applying water to such a fire would have the potential to leach the dangerous chemicals off site. This building is also scheduled to be completely condemned next year. This would leave us without a proper fertilizer and chemical storage area. Fortunately, we have reduced our pesticide use by 75%. Pests are now being treated on a spot by spot basis and only when damage reaches critical levels. Also, our inventory levels have been reduced. We are now working hard to purchase products which will only be used in the immediate future.

4-08-99

Mr. Grant Spaeth, Chairman Stanford Golf Course Advisory Committee 1717 Embarcadero Road Palo Alto, CA 94304

Dear Grant.

The Golf Advisory Committee asked for my analysis and recommendations concerning the operations and environmental conditioning of the course. I have used this assignment as an opportunity to engage in a comprehensive in-house environmental audit. Detailed in this report are the current state of affairs at the Stanford Golf Course and options for improvement.

It is my understanding that this review is a product of the desire to operate this facility in a safe, compliant, and environmentally sensitive manner. In achieving such, there are three parameters which we must adhere to: The golf course should be safe haven for golfers, employees, and wildlife. The course should have a positive net effect on the surrounding environment (provide wildlife habitat, conserve water, and preserve open space.) And finally, Stanford University must be able to express to the world its proactive position in environmental leadership.

I have organized this report in three areas. The first is a description of the current environmental conditions of maintenance operations and actions I propose to take which have a minimal impact on the budget. Secondly, I will set forth some fundamental recommendations for your consideration that will improve our role as stewards of the environment. I hope you will approve these and recommend for acceptance by the Dept. of Athletics. And thirdly, I have outlined what could be done should the University want to pursue a plan to achieve superiority in environmental golf course management. This final area would allow the University to take a truly aggressive environmental leadership position and receive numerous public and media related rewards.

Golf courses can negatively effect the environment if not managed correctly. There are four major areas in which golf course operations have the potential to impact the environment:

- 1) Hazardous material storage and use
- 2) Water quality issues
- 3) Water use issues
- 4) Wildlife habitat management

Exhibit "A" will focus on each of these areas.

Water Ouality lasues

a) Equipment washing - Golf course moving equipment collects grass clippings which are high in nitrogen and must be washed off. Equipment can also have oil or grease accumulations on the engines and hoses. Pesticide spray equipment can also have traces of pesticides left over from spraying. Washing the equipment has the potential to leach these chemicals off site and possibly into surface or ground water.

Our situation: We wash all of our large mowers out on the turfgrass where chippings are incorporated back into the turf. Healthy turfgrass and its dense, fibrous root system is one of the best filters of organic materials. We wash our small equipment at our wash rack which filters the grass from the water. The waste water then flows into the sewer system for treatment. This wash rack is pumped out monthly and tested quarterly for chemical contamination. Oil and grease residue are wiped from the equipment following washing using shop rags which are cleaned by a contractor who separates the oil from water. Pesticide spray equipment is triple rinsed and the entire rinsate is applied back to the area which was treated. No rinsate is poured out onto the ground. We have also budgeted a more sophisticated wash rack system which completely recycles wash water to be installed when county regulations require.

b) Fertilizer and Pesticide leaching - Some fertilizers and pesticides have the potential to leach from the turfgrass sites into surface or ground water. These chemicals, if over applied, can be extremely damaging to aquatic organisms or may even contaminate drinking water sources.

Our situation: Due to our proximity to San Francisquito Creek, we must be extremely diligent in our use of fertilizers and pesticides. Research has shown that fertilizers and pesticides from golf courses are not a threat when properly applied. As mentioned before, turfgrass is one of the best filters of organic chemicals. But we do take precautions in the applications. We avoid fertilizers containing nitrates which are the most easily leached nitrogen source. We do not apply fertilizers in the rainy season when a storm could wash fertilizers from the soil. We also leave a buffer zone between the turfgrass and the creek area so that any fertilizer or pesticide traveling that way would be absorbed by the buffer plant community. In addition, our budget is very limited so it would not be prudent apply a product when it could be lost to runoff or leaching.

c) Point source contamination of ground water: In the past, many ground water supplies were contaminated by fertilizers or chemicals being applied near or disposed of down well heads. This is a direct route for these chemicals to enter ground water.

Our situation: We do not have any existing or abandoned wells on our site where direct contamination could occur.

d) Septic tank leachate: Heavily used and improperly maintained septic systems have the potential to leach untreated waste into ground or surface water. These leachates are high in organic nitrogen and chloroform bacteria.

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Our situation: We have closed our only septic system which served the old restroom building on hole #13. This septic tank was directly above the creek and had a potential for environmental damage. The new building is now connected to the sewer system which cleans and treats the waste water.

e) Composting operations: Composting operations take green or food waste and convert it to a reusable organic product. These operations use sewage sludge, manure, or another nitrogen source to break down the woody material into humas. The leachate from this process can harm surface water.

Our situation: We compost our green waste and use the final product in divot mix and mulches. Our compost pile is located in an area more than 400 yards away from the creek and very little supplemental nitrogen is added. Most of the mirrogen comes from grass clippings. There is very minimal potential for environmental harm.

Water Use: Golf courses are often targeted as heavy water users. In actuality, golf courses require less water than comparable commercial or residential uses. But in times of drought, golf courses are often the first entities asked to cut back usage. With fresh water supplies limited and more water being diverted to environmental causes, it is more important than ever to conserve water. In California, water costs are high and typically second only to labor in annual golf course expenditures.

a) Water conservation: Golf courses try hard to conserve water but are often expected to provide lush, green, immaculate turigrass. Watering practices are often forced into a nightly cycle which creates more of a shallow rooted turigrass. Golf courses do have some of the best irrigation systems in use and utilize sophisticated equipment like weather stations and computerized control to improve efficiency. Most courses have full time personnel to monitor and maintain the system at peak efficiency. In general, water is not wasted due to cost and creating wet areas which are detrimental to the game.

Our situation: Stanford is fairly unique in California in that most of the roughs are not irrigated. These areas come into play but are left brown and dry in the summer. On the rest of the course, we have reduced our water usage substantially. We have been attempting to operate the course in a drier fashion for playability. This is a difficult proposition due to a combination of our turfgrass type, soil type, topography, and labor situation. When the irrigation is reduced, dry spots appear while adjoining areas stay green and healthy. We experimented on two fairways last year and had spots of dead grass, spots of blue stressed grass, and spots of healthy turf. Since we receive no rainfall in the summer to deeply soak the dry spots, we had an aesthetically awful situation. We could not keep the dry spots alive without over watering the green areas using our

irrigation system. The solution is hand watering but we do not have the labor force or the connection points to make it work. Other things compound our situation including cart traffic, compaction, clay soil, and the Poa annua grass which is our primary turf type.

Wildlife Habitat Management

a) Naturalized areas - Golf courses are encouraged to create or maintain naturalized areas around the perimeter to encourage wildlife colonization. It is in the boundary areas where wildlife diversity is at its greatest level. Naturalized areas provide cover for the habitat and migration of wildlife.

Our situation: The Stanford course has great naturalized zones. We have actually tried to expand those zones and connect them together. Our success has been limited due to cart traffic (no paths) and growing existing turfgrasses higher. The carts beat down the high grass and the turfgrass is too lush and dense for good wildlife colonization. We do have some out of play areas which should be naturalized. Examples are in front of the #14 tee and left of the path on #17.

b) Habitat Creation - Golf courses have the potential to be home to a number of wildlife species. Some specialized projects are required to create suitable habitat. Examples of these are nest boxes, bird perches, dust baths, and brush piles. Additionally, wildflowers or plant material can be planted to attract bees, birds, and butterflies.

Our situation: We have 21 nest boxes for swallows, bluebirds, and nuthatches. We have an owl box behind the first green which is inhabited by barn owls. Dead trees are left standing where possible for bird colonization.

c) San Francisquito Creek - The creek is the lone natural stream from the Coastal Range into the bay. It is home to the steelhead trout and the endangered red legged frog. It also acts as a wildlife corridor connecting the mountain community to the bay.

Our situation: The creek borders a number of holes on the golf course. Its natural and heavily vegetated state provides excellent habitat for numerous species. The stream provides water and cover for animals venturing out on the golf course. We have seen numerous birds, foxes, deer, bobcats, raccoons, coyotes, and skunks living in the area. One particular bird is the Great Blue Heron which uses our naturalized roughs to hunt rodents.

We have made numerous environmental improvements over the last few years. Stanford Golf Course is one of the most environmentally friendly golf facilities in the Bay area. Yet we still have improvements which can be made with a minimal impact on our budget.

I would like to naturalize even more areas on the perimeter of the course. This would allow us to bring the wildlife areas in closer to our playing grounds. We could change the name of our maintenance shop to the Natural Resource Management Center. It may sound trivial, but it would help set ourselves apart. The staff would also realize it the seriousness of our commitment. I would like to incorporate food waste from our restaurant into our composting operations. Our non-essential paths and roads need to be converted back to naturalized zones. And we must to encourage raptors to prey on burrowing animals by building perches and owl boxes. This must be done while striving to keep up our levels of course maintenance.

Our current level of course maintenance is still far below the private equity club level. We are only able to mow tees twice a week and rake bunkers four days a week. This is bare bottom considering the heavy seven day a week play the course receives. Project work is done sparingly and takes weeks to accomplish. Although this level has been accepted and is better than past operations, there is little room to take on tasks such as a comprehensive environmental program.

What I would like you and the committee to consider is a moderate plan to demonstrate that we are operating as stewards of the environment. We must have a way to document our environmental efforts in a positive way. We are located in a hot bed of environmental activism as part of the Stanford community. Our efforts are often scrutinized with antagonistic examination. The standards we must uphold are critical and exacting. Therefore, I propose a plan to achieve three goals: Achieve full certification in the Audubon Cooperative Sanctuary Program for golf courses, apply for environmental recognition awards, and publicize our successes through outreach and education. The Audubon program in itself is a comprehensive management tool which incorporates major environmental aspects with outreach and education. Becoming Audubon certified will require a financial investment (see Exhibit "B") as well as a paradigm shift in both attitude and operation. I feel it is very important to work towards these goals. As we begin to receive recognition, we will be demonstrating a positive and proactive environmental stance.

Exhibit "B"

Stanford Golf Course Environmental Plan

Go	al	<u>s:</u>		
* *		- N	P .15	92

- 1) Achieve full Audubon Certification in all six categories:
 - a) Environmental Planning
 - b) Wildlife & Habitat Management
 - c) Integrated Pest Management (PM)
 - d) Water Conservation
 - e) Water Quality Management
 - f) Outreach & Education
- 2) Apply for Environmental Awards
 - a) Environmental Stewardship Award
 - b) Wildlife Habitat Council Award
 - c) Other significant awards or recognition
- 3) Publicize our successes
 - a) Use the newsletter, signage, and postings at the Golf course
 - b) Utilize local media to highlight positive environmental stories

5) Install interpretive bulletin boards at Clubhouse and Pro Shop

c) Utilize golf publications

Cost breakdown;

 a) IPM/Environmental coordinator b) Summer laborer for increased hand work 	\$32,000/yr.
2) Purchase cameras to document and promote efforts a) 35mm b) digital camera or scanner	\$1,000
 3) Improve composting program a) Incorporate kitchen waste b) Add supplemental nitrogen or sewage studge c) Increase frequency of turning 	\$3, 000/yr.
4) Utilize organic fertilizers and pest control products	\$16,000/yr.

\$750

6) Install additional nest boxes and bat houses	. \$500/yr.
7) Implement water quality test program	\$1,750/yr.
8) Naturalize out of play areas	\$2,000/yr.
9) Develop wildlife habitat (perches, brush piles, etc.)	\$1,000/yr.
10) Plant wildslowers for hummingbirds, butterflies, songbirds	\$1,500/yr.
11) Purchase interpretive signage for the golf course	\$500/yr.
 12) Upgrade irrigation system for water conservation a) Install upgraded sprinkler internals and springs b) Update irrigation computer hardware c) Update irrigation computer software with SitePro and T-Map 	\$62,000.
 13) Incidental labor costs (time spent away from current duties) a) Additional cultural inputs such as acrifying, seeding, tree trimming b) Efforts to implement a recycling program c) Weed management and control d) Organic fertilizer applications (additional bulk, odor, methods of har e) Special handling and storage required for biological pest control pro f) Employee training required to perform in a new environment g) Outreach programs for schools, tours, etc. h) Hand work required from fossil fuel conservation practices 	
Total annual costs: \$73,250	

Finally, the Stanford Golf Course is a tremendous parcel of property which has the potential to be developed into an international showcase for environmental stewardship. The golf course could conceivably hold a leadership role in world wide environmental golf management. It has oak woodland, natural grassland, the un-altered, wild San Francisquito creek, and a connection to the foothills of the Coast Range. It was built on enough acreage that it is almost completely surrounded by native lands. It provides excellent habitat for wildlife including some endangered species. We also have resources at the University such as the Center for Conservation Biology which could use the golf course lands for research. And locally, there are numerous organizations and resources which could be utilized in developing the property into an environmental showcase. The

Total initial costs: \$63,750

framework is here, but the support and leadership are what must be developed. It is my hope that as we continue our environmental efforts, our program will grow into a true showcase for the world.

I appreciate you giving consideration to our environmental efforts. It is simply the right thing to do.

Sincerely,

Kenneth Williams, CGCS Stanford University Golf Course

Current positive environmental successes at Stanford Golf Course

- 1) Handling and Storage of Hazardous Materials
- 2) Hazardous Materials Code Compliance
- 3) Gasoline and Diesel fuel storage
- 4) Fertilizer and Pesticide Storage Current (this will change when old barn is closed)
- 5) Ground water protection
- 6) Surface water protection
- 7) Storm water pollution prevention
- 8) Equipment wash area water is tested quarterly and is well under standards
- 9) Pesticide use reduction
 - a) use has dropped by 75% in the last five years
 - b) all applications are done on a spot treatment basis not broadcast
- 10) All green waste is now being chipped and composted
- 11) Composted green waste is being used for divot mix
- 12) 21 nest boxes are in place for swallows, bluebirds, and nuthatches
- 13) I owl box is in place and is inhabited
- 14) Dead trees are left standing when possible for bird colonization
- 15) Native grasses and wildflowers have been planted at the end of the range to attract hummingbirds, songbirds, and butterflies
- 16) Trees are being pruned to improve light penetration and turf health
- 17) A fan is in place at green #15 to improve plant health
- 18) The old septic system above the creek for the restroom at #13 has been removed
- 19) Old cart paths through native grass areas were re-established in native grasses
- 20) Water use has been dramatically reduced
- 21) Brown, stressed, turf has been encouraged
- 22) Levels of tolerance of turf disease on greens have increased (except with the Intercollegiate Golf Coaches, they want immaculate turf.)
- 23) Out of play areas have remained or been converted to naturalized zones

Exhibit B: Stanford Golf Course Bird List

Last updated: 7/29/00.

This list has been compiled over the last few weeks, and is not complete. We estimate there may be as many as 15-30 species missing, particularly in the areas of migratory songbirds such as warblers, flycatchers, vireos, and sparrows.

	~
Species:	Source:
****	***
Mallard Duck	[1,3]
Wood Duck	[1,3]
Hooded Merganser	[1]
Great Blue Heron	[1,3]
Great Egret	[2]
Killdeer	[1]
California Quail	[1,2]
Black Shouldered Kite	[1]
Northern Harrier	[1]
Sharp-Shinned Hawk	[1]
Coopers Hawk	[1,3]
Red Tailed Hawk	[1,3]
Red Shouldered Hawk	[1,3]
Turkey Vulture	[1]
American Kestrel	[1]
Barn Owl	[1]
Great Horned Owl	[1]
Belted Kingfisher	[1]
Mourning Dove	[1,2,3]
Band-Tailed Pigeon	[1]
Rock Dove	[1]
Anna's Hummingbird	[1]
Acorn Woodpecker	[1]
Downy Woodpecker	[1,3]
Hairy Woodpecker	[1]
Northern Flicker	[1]
Nuttall's Woodpecker	[1]
Black Phoebe	[1,3]
Tree Swallow	[1,3]
Violet-Green Swallow	[1]
Barn Swallow	
	[1,3]
American Crow	[2]
Common Raven	[2]
Scrub Jay	[1,3]
Steller's Jay	[1,3]
Chestnut-Backed Chickadee	[1]
Plain (Oak) Titmouse	[1]
Bushtit	[1]
White-Breasted Nuthatch	[1,3]
Red-Breasted Nuthatch	[4]
Brown Creeper	[1]
Bewick's Wren	[1]
Mockingbird	[1]
California Thrasher	[1]
American Robin	[1,3]
	[1,3,4]
	[1]
Cedar Waxwing	[1]
-	

Yellow Rumped (Audubon's) Warbler	[1]
Brewer's Blackbird	[2]
Red Winged Blackbird	[2]
Western Meadowlark	[1]
White-Crowned Sparrow	[1]
Golden-Crowned Sparrow	[1]
Rufous-Sided (Spotted) Towhee	[1,3]
California Towhee	[1]
Dark Eyed Junco (Oregon)	[1]
House Finch	[1]
Lesser Goldfinch	[1]
House Sparrow	[1,3]
**********	*****

60 total species

- Contributors:

 [1] Fred L. Templin

 [2] Lyman Van Slyke

 [3] David Wilkins

 [4] Red Pendleton

= EXHIBIT C

■ Plants & Wildlife

Plant Information		
Please list some of the major trees	and shrubs that occur on the	property.
QUERLUS AGRIFOLIA .	· COAST LIVE OAK	JUBLANS HINDSII - BLACK WALK
QUEECUS LOBATA -	VALLEYOAK	SEQUOIA SOMPERVIEONS - COAST PUDLIC
QUERCUS DOUBLASII -		AESCULIS CALIFORNICA - BUCKEY
UMBELLULARIA CALIFOR	NICA - CALIFORNIA	BAY ZHUS DIVERSILABA . POISON OF
ALLANTHUS ALTISSIMA -	TREE OF HERVINA	
SAMBUCUS CAEBULEA -	ELDERBERON	ARCTOSTAPHYLOS SPP MANZAN
Wildlife Information		§
We'd like to get a sense of the com	mon wildlife species that you	u have observed on your course. Please
check all that apply and use blank		
	•	
Mammals		
▼ Raccoon	凌 Fox	Other: JACK PARBIT
Squirrel	Coyote	
Skunk	☑ Deer	TUEKEY, 5
(C) Opossum	☐ Bear	
I		
Small rodents	₩ Bat	
(mice, rats, voles, moles, etc.)		
Birds		
X Ducks	A Hawks	⋈ Sparrows
T Geese	☐ Eagles	(7) Warblers
T Swans	☐ Osprey	☐ Flycatchers
7 Cormorants	▼ Owls	☐ Wrens
Gulls and Terms	☐ Crows and Jays ☐ Crows and Jays	X. Titmice, Chickadee, Nuthatches
M Herons, Egrets	■ Woodpeckers ■	A Thrushes (Bluebird, Robin, etc.)
Storks, Cranes	Hummingbirds	· D Vireos
	Swallows	
Other wading birds	-	Orioles
and shorebirds	Fowl-like birds	Finches TURKEY YULTURES
	(Turkey, Grouse, Quail.	etc.)
Reptiles and Amphibians		
Frogs	7 Turtles	① Other:
★ Snakes	Salamanders	<u> </u>
Species of special concern:		GED FROG, TIGGE SALAMANDER THERS, FERREL CATS, PABBITS
Inventory		

Inventory

Do you maintain a formal checklist or inventory of plants or wildlife?

YES NO

If you have lists please include these with your completed inventory!

■ Site Features

Golf Course Features	Water Features	
180 Total number of property acres	Open Water (List the number of ponds or lakes on the course)	
Number of golf holes on the course (ONE PRACTICE HOLE)		
Approximate acres of turfgrass:	\bigcirc \sim	
105 In-Play turf grass areas	Ponds	
(i.e. greens, tees, fairways, rough)	Wetlands	
Out-of-play turf grass areas (i.e. lawns, mown out-of-play areas)	Acres - Fresh Water O Acres - Salt Water	
Natural Habitat Features Approximate acres on property of:	Streams, creeks, etc approximate length on property (i.e. 100 ft., 1/4 mi., ½ mi.) and average	
Approximate acres on property of	width of each. Include water features	
Woodland	that are dry for part of the year. Describe below:	
Acres of Coniferous (pines, hemlocks, etc.)	SANFRANCISQUITO CREEK:	
1_1_ Acres of Deciduous (oaks,	1/2 MILES LONG, 20'WIDE	
maples, etc.) 55 Prairie / Pall Grass Field	(100' WIDE INCLUDING BANKS & BUFFER ZO	
Wildflower Meadow	CREEK * 17. 16, 15:	
Desert Acres of Other Habitat, please	3/4 MILE LONG, Z' WIDE	
describe:	De in summer	
	DE IN SUMME	
Other Property Features		
☐ Yes 🖔 No Housing units: If yes, describe below ((i.e. number of single family units, condominiums)	
Plans for future development (e.g. golf	expansion, housing, resort). If yes, describe	
Plans for future development (e.g. golf expansion, housing, resort). If yes, describe below: Some Housing Planned For Course Derimeter		
AND POSSIBLY ON HOLE# 1. THE DRIVING PANGE		
IS SLATED FOR HOU	SING.	
Adjoining Land Use Describe adjoining land and land uses around your court		
North: OPEN FIELDS FOR 1/2 MILE EAST: THEN URBAN DEVELOPMENT	DRIVING RANGE & LAKE LAGUNITA THE UNIVERSITY GROUNDS & RESIDENTIAL	
South: OPEN HILLY OAK WOODAND West: SOME HILLY OAK WOODLAND, SOME		
WHICH CONNECTS TO COASTAL RANGE	RESIDENTIAL	

Exhibit D: Golf Course Walkthrough Report, July 24, 2000.

By: Fred L. Templin, templin@erg.sri.com (with minor edits by David Wilkins).

This morning at 8AM, Lyman Van Slyke of the Stanford Golf Club, Mary Harrison of Wetlands Research Associates and myself met in the driving range parking lot for a walking tour of the golf course. I presented Ms. Harrison with a blown-up color photocopy of the USGS map quadrangle showing the golf course property in sufficient detail for her first-cut assessment. Don Chelemedos has sent a much more detailed set of maps to Mike Josselyn which Mary will hopefully be able to examine when she returns to her office.

We began our walking tour on the driving range side of West Campus Drive by examining the section of the drainage culvert that runs from the golf course underneath W. Campus Drive and then into Lake Lagunita. Our goal was to assess the drainage culvert as potential Tiger Salamander habitat and to observe the year-round wildlife species that inhabit the riparian margins of the culvert. The three of us were able to scramble down into the dry culvert and walk its course from the driving range parking lot along the right edge of the driving range and out to Lake Lagunita itself. Along the way. Mr. Van Slyke (Van) filled us in on the seasonal aspects of Lake Lagunita and the drainage culvert. Apparently, during the rainy season water flows FROM the golf course TOWARD Lake Lagunita, and Lake Lagunita itself also receives overflow water from other reservoirs in the area.

During the walk toward Lake Lagunita, Mary and myself spotted several hawks, with one majestic Red Tailed Hawk on the wing, an unidentified small/medium-sized hawk which flushed out of the vegetation not more than 20 feet in front of us, and a beautiful medium-sized hawk (Coopers? Red-Shouldered?) perched on a post at the far right corner of the driving range. As we broke out of the thickly forested section of the drainage culvert and into the dry lakebed of Lake Lagunita with Van in the lead, two beautiful mule deer flushed out of the underbrush approx. 75 yards in front of us - a mature doe and what appeared to be a healthy yearling. In the vicinity of Lake Lagunita, we saw numerous bird species both on the ground and in the trees, including the Oak Titmouse, House Finch, Downy (could be Hairy) Woodpecker, California Towhee, Scrub Jay, etc. Nothing rare or unusual, but a very healthy population of native birds in their native habitat. Just to demonstrate our close proximity to the driving range, Van dropped a range ball he had found in the culvert into a thick and fluffy lie in the native grass and hit a perfectly-struck shot out of the thick stuff up onto the short driving range grass with the golf club he was carrying.

We eventually retraced our steps back along the drainage culvert, crossed West Campus Drive and emerged onto the first fairway of the golf course itself. Along the right side of the first fairway where the drainage culvert emerges, we saw numerous Chestnut-Backed Chickadees in the mature oak trees. Dozens of Barn Swallows were swooping down low over the first fairway bordering the horse stable area, and Acorn Woodpeckers were squawking up a storm in the tall oaks. I pointed out what I feel to be the #1 hawk tree in the region to Mary (the huge tree along the right side of the #1 fairway about 100 yards short of the green) but we did not see any hawks there this AM. Since there were golfers in the first fairway, Van suggested we continue to follow the course of the drainage culvert to stay out of the players' way. This path took us across the first fairway where we cut through the horse stable areas toward the #6 fairway. Along the way, Van filled us in on some fascinating history of how the Stanford lands came about in the first place. We agreed that the history of the golf course itself must be equally

fascinating, and Van has begun to assemble some facts along these lines.

On the far side of the horse stable area, we emerged onto the 6th fairway where the drainage culvert cuts across approx. 75 yards from the green. While we did not see any appreciable amount of standing water in the culvert, the ground was clearly quite wet with dense marsh-type grasses growing up. It is my belief that this area stays moist year-round. I have never seen it totally dry, although I was not around during the drought years to know. It was also in this area that we began seeing Black Phoebes in incredible abundance. These birds are almost always in close association with water, and are usually fairly solitary in nature. But, beginning at the 6th fairway we must have seen at least 20 Black Phoebes along the way. Again, the interesting fact is not so much that these birds are abundant on the golf course property, but that the excellent habitat on the golf course makes it so.

As we proceeded from the 6th fairway onto the 7th fairway just beyond the 7th tee, we saw our first of about 5-6 Western Bluebirds. The bird was nonchalantly hunkered down in the short fairway grass just enjoying life and perhaps looking for the odd bug to pick off. In human terms, the bird was so comfortable with its environment it would be like one of us taking a snooze in our backyard hammock! In short, if you are a Western Bluebird seeking to live life on easy street, look no further than the Stanford Golf Course. Also along the left hand side of the 7th fairway, we followed the drainage culvert a short distance until it entered a pipe which takes it under Junipero Serra and towards the 9th fairway on the other side of the road. The pipe presumably terminates in the vicinity of the gauging station on San Francisquito Creek along the right side of the 9th fairway. This brings up the interesting question of which way the water flows: Does it flow FROM San Francisquito Creek TOWARD Lake Lagunita, FROM Lake Lag. TOWARD San Francisquito Creek, or does one portion of the culvert drain toward the creek and the other portion toward the lake? An interesting question which may have some relevance for the Tiger Salamander assessment.

We proceeded down along the left side of the 7th fairway, keeping to the woods to avoid golfers, and saw several additional Black Phoebes and Western Bluebirds in the fairways along the way, as well as some more Chestnut-Backed Chickadees. We crossed under JPS and headed to the foot bridge over San Francisquito Creek heading toward the 8th tee. I scrambled down the stream bank to check the water temperature of the creek and found it to be a very cool 65degrees Fahrenheit - well within the optimal temperature range for salmonids such as the wild Pacific Steelhead which have been known to spawn up San Francisquito Creek in the past. At the water's edge, I noticed a huge mating swarm of Tricorythodes mayflies hovering about 10 feet over the water. Mayflies are an important indicator of a healthy ecosystem; they only live in waters which are clean, cool, and free of pollution. In the water itself, I saw large schools of baitfish-sized minnows. I did not capture any, so could not tell if these were indeed native rainbow trout parr (which would eventually migrate to saltwater to return later as steelhead). Also in the water, I found good populations of caddisfly larvae and freshwater shrimp (sometimes called scuds) - other indicators of a healthy ecosystem and important food sources for fish.

We then retraced our steps and circled behind the #7 green then crossed the footbridge across the creek on our way toward the practice area next to hole #4. Dropping down to the low tarmack bridge which crosses the creek in front of the #4 green, I pointed out to Mary the area where I have seen both Wood Ducks and Hooded Mergansers in the past. While we have no evidence that these birds nest in the stretch of San Francisquito Creek within the golf course boundaries, it is clear that this habitat provides an important stopover point during the migration of species such as these which require wooded, treelined waterways. Upon crossing the creek and proceeding along the wooded area between the 5th fairway and the creek, we were met by Mr. Red Pendleton who had driven out to meet us in a golf cart.

Red had brought along his map of the locations of the 20 bluebird nesting boxes he has placed on the golf course property. Red took us across the footbridge that leads to the #3 tee and showed us one of the two Wood Duck boxes he has placed on the property. The box is in an ideal location for the baby wood ducks to leap out directly into the water once they've hatched. Although Red has not yet seen Wood Ducks nesting in this box, it is encouraging to note that its location is just downstream from where Wood Ducks have been seen in the past.

Red also showed us how to operate the bluebird boxes. Each box has a latch mechanism that fools 100% of the Raccoons and 95% of the humans that try to disturb the boxes. Red turned over a copy of his nesting box map as well as statistics on the nest usage from the past season to Mary Harrison.

At this point, Red and myself left Mary and Van who continued their tour towards the second fairway and the lands that have been proposed for a replacement for hole #1. It will be interesting to see what Mary and Van have to report from the rest of their tour. Red gave me a ride back to the driving range parking lot, and along the way Red and I spotted more Bluebirds, some Oregon (Dark Eyed) Juncos, and I caught a glimpse of what looked like a Yellow Rumped Warbler. Finally, Red pointed out an EXCELLENT additional piece of bird habitat - an active owl nesting box in the large oak tree to the left rear of the #1 green. Such a nesting box, coupled with the close proximity to the maintenance buildings, indicates a probable Barn Owl occupation. I was able to locate an owl pellet underneath the nesting box with a full rodent skeleton preserved inside. This is clear evidence that the nesting box is in active use,

I am sorry to say that I will be out of town on August 3rd when the big hearing is scheduled to take place.

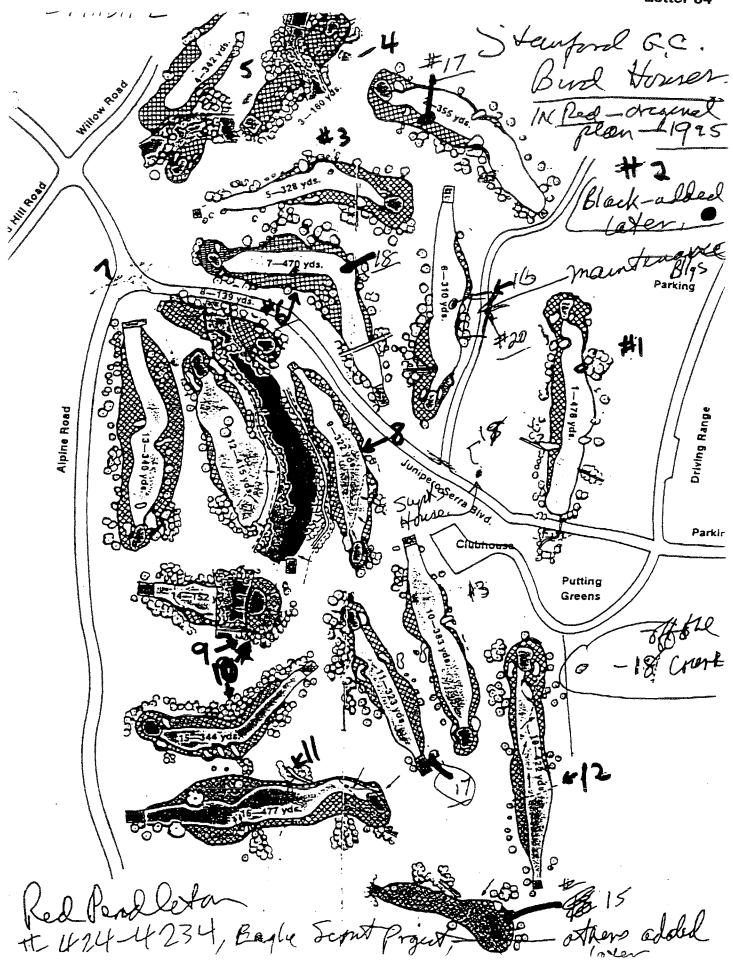
David E. Wilkins wilkins@ai.sri.com
Last modified: Mon Jul 31 19:31:05 2000

REPORT ON INSPECTION OF BLUEBIRD BOXES STANFORD GOLF COURSE SPRING 2000

Red Pendleton (650) 424-4234

Box number	April 17	July 6							
16	4 blue eggs	2 cold eggs							
2	nothing	cleaned							
	(this box has been moved to a better	ved to a better spot)							
3	nest, no eggs	cleaned							
17	1 blue egg	3 blue eggs							
4	6 blue eggs	3 blue eggs							
5	5 blue eggs, mother on nest	cleaned							
6	6 blue eggs	nesting							
7	nothing	nothing							
	(this box has been moved to a better	er spot)							
19 (practice hole)	5 baby titmice	cleaned							
8	6 blue eggs	cleaned							
11	6 white eggs (nuthatch?)	cleaned							
12	had been opened (racoon?)	cleaned							
13 .	6 white eggs (?)	cleaned							
15	nothing	nothing							
18 (off the course)	6 baby chicks	cleaned							
1	2 blue eggs	3 chicks							
Supt's house yard	5 white eggs (?)	7 dead eggs							

Comment: Most boxes in use, but several with abandoned or sterile eggs. Bad weather? Teen-age mothers?



Woodside Partners, LLC 610 Anacapa St. Santa Barbara, CA. 93101 805-965-6671

July 26, 2000

Palo Alto Planning Commission Palo Alto City Council 250 Hamilton Ave. Palo Alto, CA.

Re: Environmental Dislocation

Caused by Removal/Replacement of Hole No. One of the Stanford Golf Course

Dear Planning Commission and City Council,

I am and have been since 1989 a principal of Woodside Partners, Ltd., a real estate development company. I am familiar with the Stanford Golf Course, having played in the Stanford Golf Team in the early 1980s.

One of my specialties is golf course development, and my projects have included: The Golf Club at Genoa Lakes, Genoa, Nevada, which has been ranked as one of the best three courses in the State of Nevada; Cordevalle, at Morgan Hill, CA.; Saddle Creek, the home of the Northern California Professional Golfers' Association; and Estancia, in Scottsdale, AZ., which is ranked by Golf Digest Magazine as one of the 100 best courses in the world.

I have studied the map captioned "Proposed Golf Course Relocation Sites," which appears as Figure 7-3 (page 7-51) of the Environmental Impact Report on Stanford's current development proposals (copy of the map attached hereto), and have consulted topographical maps dated April 22, 1999, of the first seven holes of the Golf Course. Based upon this review and upon my experience as a golf course developer, I have formed three opinions relating to the possible reconfiguration of the Golf Course for purposes of acaccommodating new No. 1 hole.

(1) It would not be fefeasibleo build a golf hole alongside Sand Hill Road, because this is too far away from the Golf Course's current clubhouse and parking lot, and there appears to be no plans to have replacement clubhouse/parking lot facilities in that open space zone.

2. The only feasible solution to replace Hole No. 1 as part of a championship-length golf course consistent with the length and difficulty of the current course, would require substantial dislocation and change the greens and fairways of the other six holes to the east of Junipero Serra Blvd. Several of these holes would be reconfigured, with the accompanying earthmoving, laying of pipes and creation of new drainage systems. This would also necessitate the destruction and development into fairway of large areas of the current natural areas—grasslands and old oak forest that now lie between the second and fifth holes, and between the fifth, sixth, and seventh holes.

I emphasize that the mature native valley oak forest, which occupies an area that appears to be approximately eight acres, would be severely impacted by the rearrangement of holes. Several giant heritage valley oaks would have to be cut down. That mature oak woodland is the home of large numbers of ground squirrels, rabbits, and other burrowing animals. I am informed and believe that the ground burrows of these animals provide habitat for the California Tiger Salamander. Additionally, these woodlands provide prime hunting grounds for hawks and other birds of prey.

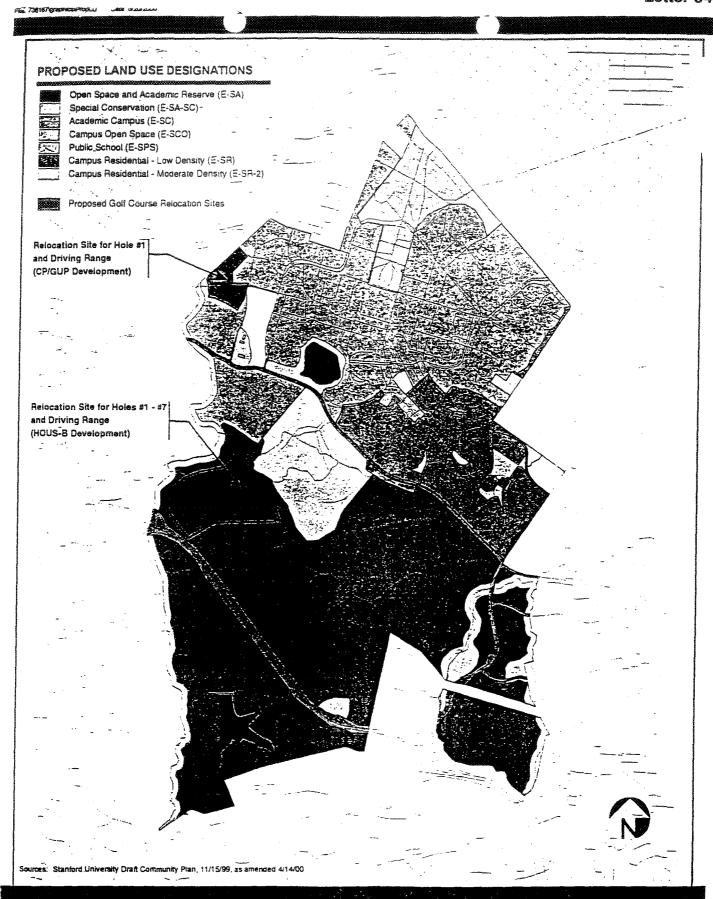
3. Based upon the foregoing, it is my opinion that the disruption to current Holes Nos. 2 through 7 and the native plant and animal ecosystems that currently coexist with these holes, would cause very substantial negative environmental impact

This letter has been limited to the environmental impacts of the rerouting that would be necessitated by the removal of the current Hole No. 1. I must say before closing that the kind of rerouting that would be required would, in addition to causing environmental distruction, cause substantial damage to the original George C. Thomas design of the Golf Course. I would also consider any such damage to the design and feel of the golf course to be very substantial negative impacts of the proposed rerouting.

Sincerely,

ad Buchanan

encl.



Stanford University CP/GUP Project EIR

PROPOSED GOLF COURSE RELOCATION SITES

PARSONS
HARLAND BARTHOLOMEW
& ASSOCIATES, INC.
Figure 7-3

San Juse merchin News

PENINSULA EDITION 5 CENTS AND ADDRESS OF THE SECOND

Serving Northern California Since 1851 W W W MERCURY CENTER COM

Stanford's change of course

STANFORD GOLF COURSE To create more housing, a proposal has been made that would require the removal of the first hole. It's also possible that the entire "lower

seven" holes could be affected.



To increase housing for students and faculty. first hole might move

By CRAIG BESTROM Servey News A proposal by Stanford University officials to wipe out the first hole at the school's historic 70-year-old off course and fill the land with student and faculty rousing has prompted gollers and alumni — includ-

o helpasve it.
Leading the charge to prezerve Stanford Golf Course is
hichard Harris, a San Franisco shorney who captained he Shandard golf team that actuded Tom Watson in the ste 1960s and early 70s.

"Anybody that knows are-

ting about golf knows that ou don't remove the first ole of a golf course," Harns

it's an abstractive Athletic Arector Ted Lokard had oped to swoid, but one 1781

oped to avoid, but one trait
pears more and more their
coccur, he said Wednesday.
"I thought that we had
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nt where we wouldn't lost
at first farway, but I think
have be prepare for the
pret case," said Leland, who

that knows enything about anii kanawa that you don't PREPARAGE TREE first hele of a

colf course."

'Anybody

- Richard Harris Son Princisco Tiey cald foraso diuney a Standard rolf customs

instease, said Leading, will change for five to 10 years, ded that nothing will change for five to 10 years, Leland said a replacement first hode could be built land selfacent to the second hose, but that might by be the beginning. It's also possible the entire were seven" holes on the property used of Junipero to Bookward could be repovated, Leland conced-

That news has angered friends of the course, ure golf greats including Woods, Wetson and four-te U.S. Wemen's Open champion Mickey Wright See GOLF COURSE, Back Page

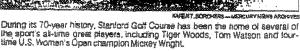
IRMER PLAYERS OPPOSED

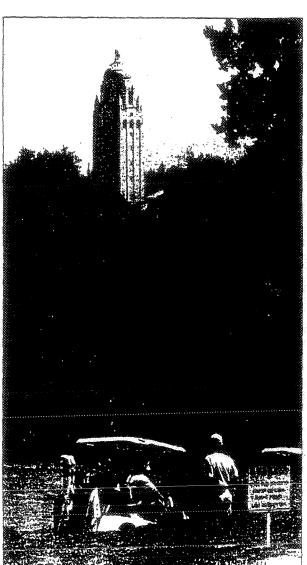
mer Stanford golfers Tiger Woods, Casey nin and Notah Begay III weren't happy to hear all possible changes at Stanford Golf Course, are willing to write letters opposing changes.











Stanford might lose first hole

Course change would produce more housing

M GOLF COURSE

from Page 11

developed their games.
Woods and former Stanford teammales Notah Begay III and Casey Maidn were poset by the news, and Woods told CBS Sportsline last week that he would "do whatever he could" to prevent the course from being altered Heither Woods, Degay nex Martin could be reached for comment, but all have sald they are willing to write letters or posing changes to their college course.

Not open to the public except for a few tournments carb year, the course is used mostly by faculty, students and alunual. The course covers approximately 175 acres of bind on the east and west aides of Junipero Serra Boulevard, north and west from the center of campus.

In documents pending before the Santa Clara County Board of Supervisors, university officials are seeking permission to build 350 to 687 housing units on several locations around the campus, Among the arras eximated for development are the first fairway, driving range, and, ultimately, the area occupied by holes I fluough 7

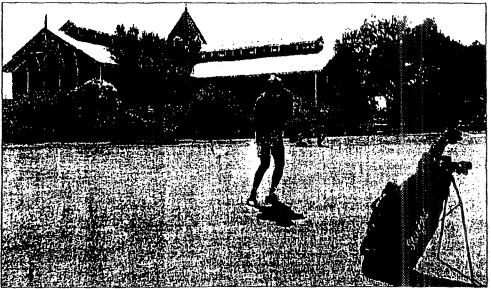
"The first hole is a good hole, but it's not the lincipin of the course," said Leland, who ramains steadfast In his belief there's a way to retain a top-quality, 18-hole course.

A pluming commission bearing to discuss the issue is scheduled for Aug 3 at City Council Chambers in Palo Alto, but a key decision is whether the county regulres Stun-ford to build 250 housing units to support its 2 million square foot academic expansion, or if it demands more than double that amount.

University officials confirmed they have been told that their highend manber of 687 units will be the naimmum requirement, with 1,000 urits a more likely necessity. If that's the case, the golf course is in trouble

Opponents of the planned changes to the golf course don't dispute Stankerd's need for additional housing, but they do contend the school owns other areas where it could

Leland and Larry Horton, the unirensity's director of government and community relations, say that's just





If the first hole at Stanford Golf Course, being played Wednesday by graduate student Ken Sustow, is removed, a replacement could be built on land adjacent to the second hole, according to Athletic Director Ted Leland. It is also possible that the first seven holes could be affected.

The first hole is a good hole, but it's not the linchpin of the course.

- Ted Leland, Starford athletic director

not the case

There's an assumption that Stanford has a lot of options for housing sites, but if you look at the actual number of sites where Stanford can build housing there are very few, said florton, who challenged anyone to prove him wrong.

The Pulo Alto housing crunch only exocerbates the problem. The city faces a huge housing shortage and hopes that Stanford's expanding worldorce can find places to live on University property.

"Our highest priority has to be the scademic future of the university, Horton said. "We are talking about balancing priorities. Sometimes in this world we don't always get to make the choices we want to

There are better choices, course pporters believe.

Harris, who is speatherding the fight because 'no one else was doing it and it had to be done," said a Web site at www.savestanfordgolfcourse.com should be up by

This is a masterpiece by one of the greatest arristects (George Thomas) in the history of golf, and this was his last work," Harris said.

For years, Stanford Golf Club members have heard rumors that the course might someday be altered, but as recently as October, they were assured by Leland there was no reason to worry. Now, they feel more than a little betrayed.

"I think that's a legithmate criticism of me personally," Leland said



Leland, a golfer limself, said les," Leland said, "and the housing there are probably some people who think he hear't been strong enough in his efforts to save a historic

"My priority has to be to academ-

crisis at Blandard is a scrious prob-

But not an insurmountable one. he said.





MARK HARRYSTEV -- ASSOCIATED PRESS Tiger Woods, above, and Notah Degay III, left, are among the many star golfers who honed their games at Stanford Golf Course white they were students.

we'll figure out a way to do it."

Write Craig Bestrom et 750 Ridder Park Drive. San Jose 95190; call (108) 929-5721; file CHMY 920-5844; or e-moil



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STAY THE COURSE Golfers, alumni urge Stanford to spare signature first hole

Bill Workman, Chronicle Staff Writer



A proposal to bulldoze the first hole and its fairway on the exclusive Stanford University Golf Course to make way for faculty and student housing has teed off golfers and Stanford alumni.

The uproar over the plan -- and the suggestion of future alterations -- joins a chorus of disapproval from university neighbors, activists and leaseholders over Stanford's growth plans for the next decade.

The golf course housing proposal calls for a mix of as many as 570 townhouses, condos and apartments to be built on 38 acres, including the first-hole fairway that is currently reached by sending a ball over Junipero Serra Boulevard from atop a manicured ridge overlooking the campus. Officials say a replacement for the par-5 opening hole would

likely be built farther north, next to the existing second hole.

Stanford golfers, who include greens-loving Silicon Valley CEOs and superstar Tiger Woods, are also fretting over signs of possible change. The university has already indicated more housing could gobble up the driving range near Lake Lagunita, while the recently released environmental impact report on Stanford's 10-year plan -- now

Wednesday, July 19, 2000

San Francisco Chronicle
CHRONICLE SECTIONS

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under review by Santa Clara County — mentions possible relocation of all seven holes north of Junipero Serra Boulevard to the south side to make room for housing.

Furthermore, an internal athletic department review of capital projects for the years 2000 to 2008 -- a copy of which was obtained by The Chronicle -- shows the university is considering building an 18-hole golf course, apparently in the foothills, which Stanford has pledged to leave as open space for at least the next decade.

The existing championship layout would be ``scaled down to a nine-hole executive course," according to the document.

Even by changing the first hole, Stanford would ``embark on a great mistake," said Richard Harris, a San Francisco attorney and former captain of the Stanford golf team in the late 1960s and early 1970s that included Tom Watson.

Harris said he has contacted Watson, Woods and several other Stanford alums on the professional tour to enlist their help. Woods reportedly told CBS Sportsline that he would write Stanford officials urging them not to alter the course on which he rose to celebrity as an undergraduate.

A leader of the recently formed Committee to Save the Stanford Golf Course, Harris said he understands the university's need to build more affordable subsidized faculty housing to be able to recruit and retain top professors in competition with other major universities.

But, he said, Stanford "has not looked

hard enough at other possible sites besides the first hole, probably because they did not fully appreciate the historical, architectural and landscape values of this world- class golf course," the last one designed by famed golf course architect George Thomas and opened in 1930.

Not so, says Larry Horton, Stanford's director of governmental and community affairs and its point man on the so-called Community Plan, which will govern campus development at least until 2010 and requires the county's issuance of a general permit.

Horton said the university is determined to maintain a first-class golf course. Nonetheless, he said, ``we're hard-pressed to find sites on which we will be permitted to build housing."

County planners, he said, insist that any new development take place within the more densely populated core campus to reduce traffic and pollution.

"I defy anyone to tell me where there is any land to build on," he said. "It's also exceptionally difficult, if not impossible, to find any potential housing sites that are not controversial."

Last week, more than 200 physicians, dentists and other medical professionals with offices on Welch Road near Stanford Medical Center packed a Palo Alto City Council meeting to protest a long-range proposal of city planners to tear down some office buildings to make room for more university housing. The idea was quickly tabled, and city and university officials later said such a project might not take place for many years.

Stanford officials said they have no

bigger plans on the drawing board than the first-hole project, adding that the golf course relocation alternative was floated by county planners, not the university.

Associate Athletic Director Darrin Nelson said he has not seen the internal document reviewing its proposed capital projects, but he believed it is little more than a ``wish list. There has been a lot of talk about a future golf course, but it's just that, a lot of talk."

The only other possible golf course change on the horizon, said Horton, is realignment of one or two holes near Sand Hill Road. But that could only happen if neighboring Menlo Park agrees to allow a stretch of the road from Santa Cruz Avenue to the San Francisquito Creek Bridge to be widened as part of the extensive projects that have linked Sand Hill to El Camino Real.

The university has already started construction on nearly 1,000 units of faculty, student and senior housing on Sand Hill Road and has pledged \$10 million toward widening the road if Menlo Park gives its approval. But city officials have thus far resisted the widening project.

In another housing-related turf war, Stanford is wrangling with dozens of older and retired faculty who own homes on leased university land in the bucolic southwest section of campus.

The leaseholders, whose homes have skyrocketed in value in recent years, are fighting a Stanford plan to build more housing on vacant fields in their exclusive neighborhoods. There is even talk among some leaseholders of petitioning to be annexed to neighboring Palo Alto.

In its proposed growth plan, the university has outlined plans for more than 4 million square feet of new construction, including 3,000 units of student and faculty housing, a basketball arena and a regional performing arts center.

Despite assurances of limited golf course development under the plan, disgruntled golfers and wary environmentalists wonder why the university still wants to rezone the entire course from open space to `campus academic," a category that would permit student housing. Activists have been pressing Stanford to commit about 2,000 acres of undeveloped land in the foothills west of Junipero Serra Boulevard to permanent open space.

"Why change the land use designation, unless you have plans for the future?" said Denice Dade of the watchdog Committee for Green Foothills.

Peter Drekmeier of the Stanford Open Space Alliance, composed mostly of Stanford employees, said the vagueness of the university's golf course plans has provided ``a great opportunity for an alliance" of environmentalists with golfers.

"With all its history, a lot of people are attracted to the golf course just as it is," he said.

STANFORD PLANS

The draft environmental impact report on Stanford's growth plan, which was to get its first public airing last night before the Menlo Park City Council, is the topic of a joint meeting tonight of the Palo Alto City Council and Planning STAY THE COURSE/C - ters, alumni urge Stanford...

Commission. The meeting begins at 7 p.m. in the council chambers at Palo Alto City Hall, 250 Hamilton Ave.

Santa Clara County planners are scheduled to take public comment on the document on August 3, also in Palo Alto City Hall, beginning at 6:30 p.m. The environmental impact report process will be followed in the fall by the county Board of Supervisors' consideration of a general use permit.

E-mail Bill Workman at wworkman@sfgate.com.

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Sections

GO

Feedback

Richard H. Harris Jr.

From: Telfe

Telferkirk@aol.com

Sent: Thu

Thursday, August 03, 2000 6:39 PM joe.simitian@bos.co.santaclara.ca.us

Subject: Stanford land use plans

Dear Supervisor Simitian,

I would like to add my voice to the chorus of those who are dismayed by Stanford's intentions to sacrifice the first hole of the Stanford golf course for housing. There is no question that the University's need for additional housing for faculty and students is legitimate: it is well documented and critical to the future success of this great institution. What the University has failed to do, however, is to consider seriously the several alternative (and perfectly rational) options that exist for solving the housing problem at other sites on Stanford land. I hope that you and your colleagues on the Board will raise this issue in your review of the University's plans.

What follows below is not directly germane to this issue, but I include it here as a sort of context for the ongoing discussions. I have for the last six or seven years been a member of Stanford's Golf Advisory Committee (GAC), advising the Athletic Department on many aspects of golf course management and policy. We knew as long ago as a year or so that the University was considering the first hole of the golf course—along with several other sites—as a possible newhousing area. But the discussion at that time was always of the character: "It's not settled; it's many years away; and there will be plenty of time to thrash out the pros and cons before any decisions are made." But in fact there does not appear to be "plenty of time," as has now become apparent. I am inclined to attribute this kind of planning (or lack of planning) to a degree of subterfuge on the University's part; but it may instead be a not untypical combination of avoidance, incompetence and father-knows-best patronizing.

At any rate, thank you for your attention. Others will write to you about the glories of the golf course, environmental matters, alternative housing sites, etc. I focus here on the lousy planning process that has resulted in a plan that reflects little or no input from a large, vocal and seriously affected constituency—the Stanford golfing community.

Sincerely,

Bill Kirk

telferkirk@aol.com

Richard H. Harris Jr.

From:

Jwismith@aol.com

Sent:

Saturday, August 05, 2000 3:16 PM

To:

harrisjr@sirius.com

Subject:

Planning Commission remarks

Rich,

Here it is

I am Roger Smith, a Stanford graduate and current President of the Men's Section of the Stanford Golf Course. As such, I represent a constituency of over 400 members with great interest and concern over the future of the golf course, now at risk in the DEIR.

As late as this March, we received assurances at the University Golf Course Advisory meeting that the course was not in jeporady despite the acute housing problems. It was only subsequent to that time that we learned of the true developmental plans Stanford had for the golf course.

Because of this new information, and growing member concern, I called a Member Forum, which was held on July 25. During the University's presentation at the Forum, it became clear that they were following the path of least resistance, or at least they thought so up to now, in solving their housing needs.

I am convinced the plan is flawed in numerous ways but would like to make three observations:

- 1. At the Forum, they gave no indication that they had studied, or even considered, other alternatives, and most specifically increasing density on the present campus.
- 2. You cannot just replace a hole (or God forbid the bottom seven holes) of a championship golf course like Stanford. I know we are not all golfers, but can you imagine having to drive a half mile from the clubhouse to tee off on the first hole at St. Andrews or Pebble Beach.
- 3. The course is and will continue to be the most appropriate use of open space in this environmentally sensitive area.

It is simply to valuable an asset to eliminate, and on behalf of the Men's Club membership, I urge you to make a decision that will keep the course in its present status and configuration.

Finally, I present petitions to course signed not only by golf course members but individuals throughout the county who urge this action.

(I then read the summary page Rick prepared for submission with the petitions)

Roger

Richard H. Harris Jr.

From:

Rick Stultz

Sent:

Sunday, August 06, 2000 4:01 PM

To: Subject: Richard H. Harris Jr. Petition breakdown

PRESENTATION OF PETITIONS TO SAVE THE STANFORD GOLF COURSE

We would like to present you with petition not to develop the golf course as housing but rather designate it as open space.

Although the University did not allow us to solicit signatures at the golf course, we have obtained 553 signatures in the last four weeks.

62% of these are from people who are not affiliated with Stanford. 15% are from golf members, 15% from Students and 8% from faculty and staff.

There is broad based support for this petition: Every city in Santa Clara County was represented with only 19% coming from the Stanford/Palo Alto area.

This certainly is an issue that has county-wide support. Please save the golf course.



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August 3, 2000

Gerhard Casper President Stanford University Stanford, CA. 94305-2060 VIA EMAIL

Dr. John Hennessy President-Elect Stanford University Stanford, CA. 94305-2060

Supervisor S. Joseph Simitian Santa Clara County Board of Supervisors 70 West Hedding St., San Jose, CA. 95119

Ms. Sarah Jones County Associate Planner Santa Clara County Planning Commission 70 West Hedding St., San Jose, CA. 95119

Re: Proposed Rezoning of Portions of the Stanford Golf Course

Ladies and Gentlemen:

I am writing this letter on behalf of myself and other new members of the Stanford Golf Course listed below to express our strong objections to the University's plans to redevelop the 1st hole of the Stanford Golf Course, and possibly holes 2-7.

The members listed below and I all have the following in common:

- We all joined the Stanford Golf Course within the past 12 months.
- All of us eagerly waited 13 or more years on the wait list for the chance to join a golf
 course that is unquestionably the finest university course in the world, and ranks with
 Olympic, San Francisco, Pasatiempo and the notable courses in Monterey as the finest in
 California.
- We all love this course because it is an integral part of our experiences at Stanford, and
 presents a great way to tie us regularly back into the campus. Knowing my golf
 membership was imminent, I, for one, became a life member of the Stanford Alumni
 Association, and will be getting involved in other ways on campus as well. In short,
 thanks to the golf course, Stanford is again becoming part of my life.
- All of us have paid or are paying \$50,000 to join the course on a non-equity basis despite a 250% increase in the fee charged the prior year.
- Neither the Athletic Department nor the University provided any of us any information whatsoever regarding the University's plans to rezone the golf course or to develop housing on any part of it.

• We all believe that the University will never gain approval from the various competing interest groups to rebuild holes to be taken under this plan. The land that ostensibly cannot be found now to build additional housing will not somehow be available later to build replacement holes. Therefore, once holes are taken, they cannot be replaced at all.

While we understand Stanford's desire to address housing issues on campus, we are certain other solutions such as alternate sites on campus and minimal increases in density are superior alternatives to destroying a precious, historical University asset.

With this in mind, we urge the County to deny Stanford's plans to modify or remove Hole #1 or any other portion of the Golf Course, and urge the University to find less destructive solutions to its housing concerns.

Best regards,

Rex S. Jackson Shirley Merrill David Obershaw Lynn and Olivier Pieron

MORSE ERSKINE (1895-1968

J. BENTON TULLEY (1908-1974)

1110 to EY

ERSKINE & TULLEY A PROFESSIONAL CORPORATION

220 SANSOME STREET, SUITE 600 SAN FRANCISCO, CALIFORNIA 94104 PHONE: (415) 392-5431 FAX: (415) 392-1978

August 10, 2000

By Federal Express

Santa Clara County Planning Office Attn: Sarah Jones, Planner 70 West Hedding St., East Wing 7th Floor San Jose, CA. 95110

Re: Stanford University CP/GUP

Comment to Draft EIR

Committee to Save Stanford Golf Course

Dear Ms. Jones,

Enclosed please find the original and one copy of the Report of Hart-Howerton Planners-Architects-Landscape Architects, dated August 7, 2000. Hart-Howerton is the planning consultant to the Committee to Save Stanford Golf Course. The Hart-Howerton report is referenced as Exhibit 19 to the Response to EIR, submitted by the Committee, also dated August 7. I enclose an exhibit tab, with the number 19. Please forward a copy of this Exhibit 19 to the County's EIR consultant, Parson, for inclusion in their packet. Thank you for your cooperation.

Very truly yours

Richard Harris

encls.



Robert L. Hart, Architect David P. Howerton ASLA, AICP

30 Hotaling Place
San Francisco, California 94111
Tel: 415 986 4260 Fax: 415 986 4394
Email: hh@hh-sf.com

August 7, 2000

Ms. Sarah Jones County Planning Department 70 W. Hedding Street San Jose, CA 95110

Re: Response to the Stanford University Draft Community Plan and General Use Permit Application Draft Environmental Impact Report dated June 23, 2000

Dear Ms. Jones:

On behalf of the Save Stanford Golf Course (SSGC) committee, we would like to submit the following comments in response to the request for public comments with regard to the above described Draft EIR. Our firm is currently consulting to SSGC to assist them in evaluating both Stanford's development proposals and the Draft EIR.

Hart-Howerton is a group of 150 planners, architects and landscape architects with main offices in San Francisco and New York. The mainstream of our practice has been master planning in special situations - - in places that require an especially thoughtful, innovative response to a unique environment or institution. Our project have bee located in all regions of the United States, as well as in Europe, Asia and the Caribbean

We have dedicated a part of part of our practice to planning for education. We have spent many hours with faculty, staff, trustees, active alumni, and students learning about the operation and opportunities of education, particularly private education, in America.

Our clients have included many of the leading landowners, institutions, and businesses in the country. In education, we have had assignments at the collegiate level from Vanderbilt University and the United States Naval Academy, at the "Upper School" level from The Hill School in Pennsylvania and Episcopal High School in Alexandria, Virginia, and at the "Middle" and "Lower School" levels from Greenwich Country Day School in Connecticut. We have also been retained by such institutions as The National Trust of Historic Preservation, Callaway Gardens in

Georgia, and the Queen Emma Foundation in Hawaii. Our landowner clients have included golf course developers and the Rockerfeller family in the Northeast, Ross Perot Jr. in Texas, Vail Associates in the Colorado mountains, and the Pebble Beach Company in Carmel, California.

We at Hart-Howerton look forward to continuing to contribute to this planning process and helping Stanford preserve its golf course treasure. If there is anything else we can provide you, or perhaps provide any additional clarification, please do not hesitate to contact us.

Thank you for your consideration.

Sincerely,

Walter R. Stewart

SAVE STANFORD GOLF COURSE

DEIR Response

Facility Development Site Alternatives

The Stanford campus contains a variety of modern, traditional and obsolete buildings and facilities. The traditional campus also contains a mix of vacant and nearly vacant land woven around and through the core. These represent both opportunities and constraints when considering the new campus master plan and development strategies. The following section lists a few examples of the development opportunities available within the traditional campus core that could be used to satisfy the future academic and residential building program.

These development opportunity examples reflect the SSGC alternative development strategies that include:

- (1) Building high-rise undergraduate and graduate student dormitories on selected lots of Stanford's approximately 150 acres of surface parking lots:
- (2) Making up for lost parking spaces by building parking structures, of four levels or more, on appropriate surface parking lots:
- (3) Developing selected blocks of eucalyptus groves north of the Ellipse in a comprehensive master-planned manner; and
- (4) Reallocating the different types of proposed new housing (undergraduate, graduate, and faculty-staff) to appropriate sites.

We have listed a few examples on the chart, captioned "Campus Core Utilization Analysis (Partial)," (the "Chart") which follows. The Chart is divided into two sections: (A) our reanalysis and modification of residential projects proposed by Stanford, as listed at Table 2-1 of the Draft EIR; and (B) our suggestions for development of parcels not mentioned by Stanford.

The Chart follows on the next page.

August 7, 2000 Page 1

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With regard to the Chart,

- The parcels originally proposed by Stanford are designated alphabetically, using the same letters used by the Draft EIR, the proposed housing sites map (Figure 2-5 on page 2-11) and Housing Site Chart (Table 2-1 on page 2-13) i.e., the Searsville Bock site is designated as "G";
- CSSG's suggested modifications of Stanford's proposals are designated with the same Capital letter and a small-m notation, i.e. the Committee's modified Searsville Block proposal is identified as "Gm";
- The Committee's new suggestions are listed under a subheading "SSGC Proposal (Partial)," and are numerically designated.)
- Hole No. 1 of the Golf Course is only a portion of the so-called "Stable Site," designated as Site "O" on the Proposed Housing Site Map, Figure 2-5 of the Draft EIR (p. 2-11). The "Housing Sites" Chart, Table 2-1 of the DEIR (p. 2-13) shows Site "O" as comprising 37.8 acres. However, our planimeter measures Site "O" as containing only 31.7 acres; we cannot explain the anomaly, however, we point this out and ask the County as a part of the EIR process to accurately determine the sizes of the affected parcels. Of the Site "O," the Hole No. 1 portion comprises only 11.8 acres, according to our planimeter measurements.

To visualize the Committee's proposed modifications and new sites in comparison to Stanford's proposal, compare the Chart to the Draft EIR at Figure 2-5 (page 2-11), and Figure 4.4-4 (Campus Parking Facilities Map) on page 4.4-20.

Briefly stated, the Committee, as examples of the kind of thinking that should be done at this time, makes the following suggestions for residential development sites on the Stanford main campus:

- (1) The Searsville Block, currently a small, low-density faculty neighborhood west of Roble Field, should be maintained in faculty housing, but should be redeveloped at an average density level of 12 units per acre, such that most of the units would be approximately the density of the developed portions of the popular Peter Coutts faculty housing;
- (2) The 21 acres of park-and-ride parking lots in the block bounded by Stock Farm, Oak, and Welch Roads, and smaller parcels on Pasteur Drive (6.8 acres) and Stock Farm Road (1.5 acres) should be developed into faculty-staff housing at an average density of 12 units per acre; the 9.3-acre block currently occupied by the Carnegie Institute of Washington, Cordura and Ventura Halls, and a lot of open

- space, should be redeveloped to graduate student residences and a two-acre, 4-level parking structure;
- (3) Parking structures should be developed on the current surface lots at Ginzton, Roble, and Lagunita;
- (4) The parking lot (currently occupied by manufactured buildings) at the eastern end of Wilbur Hall should be developed into a 4-level parking structure, and two high-rise (7-story) graduate student dormitories should be developed in the parking lot to the south of Wilbur Hall;
- (5) A six-level, 3,000-car parking structure should be developed on four acres of the 11.4-acre Galvez-Toyon lot across Galvez Street from the Football Stadium, leaving the remainder of the parcel available to be developed for mixed residential and other academic campus as part of a master-planned development of a substantial section of the eucalyptus stands on the north side of campus; and
- (6) The Environmental Health Facility should be relocated to a more remote site, away from the developed and developing portions of the campus; the land thus vacated could be cleaned and made available for housing, or alternately could become part of a replacement Driving Range site or other uses.

The Committee's suggestions would leave both the current driving range and the old horse pasture to the right of Hole No. 2 of the Golf Course vacant for the time being, pending current efforts to determine how much, if any, additional lands the Golf Course may need to make up for a portion of the current Holes ## 3 and 4 which are expected to be lost to the Sand Hill Road widening project in Menlo Park. At such time that this issue becomes clearer, there may be yet additional lands that would be available for residential development, subject to relocation of the Driving Range.

If all of the Committee's suggestions were to be adopted, (and not including any additional housing opportunities there may be at the Driving Range, the lot to the right of Hole No. 2, and the eucalyptus stands, there would be 3,063 new units of housing. This is substantially more units than are contained in Stanford's own housing proposals, and more than enough to meet the University's housing demands for the foreseeable future. Over the future years, additional housing opportunities will develop as the University improves the utilization of the 400-plus acres of faculty housing in the current main faculty neighborhoods at the southwestern corner of the Main Campus, as the eucalyptus groves are developed, and as additional lands are made available for development in Palo Alto and in unincorporated San Mateo County (on the south side of Sand Hill Road, between the Buck Estate and Highway 280, and Palo Alto.

A more detailed discussion of these housing opportunities follows.

Potential Campus Development Sites

Existing Surface Parking Lots

Overview

On-campus parking is a mix of surface and (more recently) structured parking facilities scattered across the campus core. The surface lots vary from the very large, such as the Stock Farm Lot complex in the west, to moderately sized lots located here and there as needed, to odd parking spaces created where space was available.

Much of the surface parking is considered too far from most facilities necessitating the Stanford Marguerite Shuttle linkage. Ideally, the parking is conveniently located relative to the target activity or facility. This is often unachievable with surface lots as they consume a significant amount of land in otherwise valuable or desirable locations.

As the campus population grows it becomes easier to justify converting sprawling surface lots into compact conveniently located structured parking. This conversion nets two significant benefits- more convenient parking and more land available for development.

Examples

Stock Farm Lot Complex (CSSG Projects 1a-c)

This very large surface-parking complex provides nearly 2,000 parking spaces.

As a development site, it can be reasonably expanded to include the surrounding vacant or nearly vacant lands (these are noted below). The existing parking resource could be combined into several new parking structures located across Campus Drive, for example on the Cordura Hall / Ventura Hall site area, inside the core loop road adding both parking convenience and new development sites outside the loop road.

Roble Field area (CSSG Projects 3a-c)

Roble Field provides a relaxed and useful open space resource in between the Searsville Block and the heart of the campus. This should be preserved and enhanced. Surrounding the field, however, are several notably sized surface parking lots that could be converted into multi-level structure garages not unlike the nearby Parking Structure II. Such a conversion (if only 4 levels) would increase the number of spaces from 677 to 3,294.

Wibur Hall area (CSSG Project 4)

Just east of Wilbur Hall is a series of older single story manufactured buildings surrounded by, and adjacent to, some 514 surface parking spaces. If a four level garage replaced these older buildings occupying only two acres, the number of spaces would double and the amount of land dedicated to parking would be reduced. This solution places a major parking resource inside the Campus Drive loop conveniently located near the library and central core.

Others

A quick study of the campus parking plan suggests there are many other opportunities to convert large and small surface lots into well located structured parking resources to support the existing and future academic program.

Existing Vacant or Under-utilized and In-fill Sites

Overview

As mentioned earlier, the campus is full of opportunities to redevelop very low density or nearly vacant sites. The resulting intensification would enable the school building program to develop new facilities within the existing service and utility network.

Examples

Bleeker, Greenhouses, EH&S complex (CSSG Projects 1d, e)

Surrounding the Stock Farm parking lot complex is a mix of vacant and under-utilized land. Between the lots and Pasteur Drive, in between the lot segments, and south of Stock Farm Road is vacant land suitable for development.

To maintain a suitable buffer between the campus and Sand Hill Road, it is possible to create a large development setback of perhaps 250 feet and still create very large development sites. The setback could (and should)

be properly landscaped in keeping with its role as a buffer between the campus and community.

Carnegie Institute, Cordura Hall / Ventura Hall (CSSG Project 2)

Just inside the Campus Drive loop, west of the central core area, is a relatively large and relatively vacant parcel containing the Carnegie Institute of Washington, Cordura Hall / Ventura Hall facilities. These represent a notable under-utilization of a very well located development site.

The site is sufficiently large to accommodate both a major structured parking resource and new housing. Housing in this location is compatible with the adjacent Searsville and Governor's Corner area residential uses. It is convenient to parking, transit, and the Roble Field recreation and park.

In-fill Sites

The campus core area provides an interesting mix of built and open areas, many of which form useful formal and informal open spaces. The resulting texture greatly enhances the academic and living environment unique to this campus.

And yet, there remain areas large and small scattered throughout the campus core area that present notable in-fill development opportunities. Examples of such sites vary from areas in between the Oval and the Daper/Admin area block to the odd lots from Roble Gym to Stern Hall.

Redevelopment Sites

Overview

The campus is also full of outdated, obsolete or under-utilized buildings. These represent both opportunities to modernize the facilities and to intensify the land usage within the existing central core area.

Examples

Searsville Block (CP/GUP Project G)

The CP/GUP calls for the redevelopment of the Searsville Block from 13 faculty residences into 250 grad-student units. The CSSG finds a site area discrepancy between the GUP (12.8 ac) and its own measurement (9.5 ac).

Regardless, this existing very low-density residential site (13 units) should be redeveloped to provide a significantly larger number of new housing units. However, rather than graduate student housing, as proposed by Stanford (as represented at Table 2-1 of the DEIR), CSSG suggests this could better be utilized as medium-density faculty housing. This would be consistent with his historic faculty housing character. The nearby Roble Field would make this a very attractive faculty housing area, with the field available as recreation space for families with young children. CSSG suggests densities in a range between 10 to 18 units per acre, for a mix of faculty, retired faculty, and faculty widows/widowers. At 10 units per acre, the density would be comparable to the developed areas of the highly successful Peter Coutts development; 18 units per acre is somewhat less than another clustered faculty housing development, the Pierce-Mitchell houses.

If Stanford's figure of 12.8 acres is accurate, and if the Searsville Block were to be developed at an average of 12 units per acre (only slightly higher than the developed ground at Peter Coutts), 152 medium-density faculty/staff housing units could be developed at the Searsville Block site. Parking for this block could either be developed underground beneath the block, or alternately in multi-level parking structures to be developed nearby.

Stern/Wilbur Hall sites (CSSG Project 4)

These two undergraduate residence halls have been a first-year experience for generations of new students. They are also relative low-density and "old school" with regard to residence sizes and facilities. When considered with the adjacent surface parking lots and older one-story buildings to the east, the combined Stern Hall and Wilbur Hall block forms a 20 acres building site. The 2-acre parking structure that is proposed above on this site would still leave nearly 18 acres available for development.

Two basic possibilities exist- redevelop the parcel in part or in its entirety. Given the parcel size and location, such a site represents a major opportunity to dramatically change either the character of the inner-campus core or increase the number of well located residential units, or both. The CSSG proposal calls for the existing residence halls to remain (for now), a new 4-level parking garage to be developed at the eastern end of the block, and the construction of new mid-rise (7 level) graduate-student apartment towers. These new towers could be located along

Campus Drive south of Wilbur Hall, incorporating a small portion of Wilbur Field and portions of the existing surface lots to either side.

Escondido Village (CP/GUP Projects D & E)

The CP/GUP identifies two new residential projects 'D' and 'E' in this area. Given the age and low-density character of this entire area it would seem reasonable to view its status as a housing resource more aggressively.

Implementing a phased redevelopment program calling for a mix of midrise and high-rise building types could perhaps solve the entire graduate and undergraduate housing requirements. The potential benefits of concentrating a major portion of the student housing in such an area are obvious. However, due concern would need to be given to traffic congestion of Stanford's neighbors to the southeast in College Terrace.

Others

The campus core area offers many other low-rise, low density or underutilized facilities within the central core area that may be attractive as potential redevelopment sites.

The Eucalyptus Groves

Overview

The beauty and drama associated with Palm Drive and the arboretum has diminished over the years as the invasive and non-native eucalyptus trees have taken over from the original landscape efforts.

This parkland has been reduced to providing overflow parking for the football stadium or to satisfy parking for other major events. The ground has become effectively an environmental desert with little to offer students, staff or the community with regard to its use as a park.

Its other important role is to serve as a noise and visual screen between the University and the downtown Palo Alto.

Given its poor natural state and lack of useful purpose, funds to maintain, much less restore the grounds are in short supply.

This large and well-located resource should be specifically master-planned to determine how it can best serve the school's needs. Some rumors are circulating

that new athletic facilities may be proposed for the Galvez Field / Toyon Grove area. Instead of slicing away pieces of this unique resource on an ad-hoc basis as development opportunities present themselves, the entire park should be considered and designed.

It would seem reasonable to expect that this open land could be portioned into sections that both create new or invigorated park use, garden, buffer, mausoleum, etc., as well as creating sites for various campus facilities. All of these would be well located with regard to service and use by the students.

Examples

Palm Drive, El Camino Real Park (CSSG Project 5a)

The historic Palm Drive is today just a shadow of its former self. The lands on either side of the road, perhaps at least some 250-300 feet to either side, should be landscaped to create a "new" park and campus entry experience. Such a dimension matches the scale and alignment of the Oval.

Development (potential or already planned) fronting on this invigorated park space would obviously benefit from the change. In turn, improvements to this park space can be justified given the direct benefit it generates for the adjacent sites. This symbiotic relationship will be good for both.

This revitalization could continue along El Camino Real extending some 250 feet into the park, for example. This treatment would both improve the appearance of this buffer zone while also enhancing the chance that it might actually be used for something other than occasional parking.

Mausoleum Park (CSSG Project 5b)

This special place, along with the nearby 'Angel of Grief', should be preserved as park and open space.

Galvez Field / Toyon Grove (CSSG Project 5c)

As noted above, various rumors existing regarding the proposed use of this sizable and well located parcel. Again, it should not be designed or developed outside the context of a new specific master plan for the entire Arboretum / Palm Drive area. This 11 plus acre portion of the park could, for example, be developed to provide additional athletic facilities as well as

new structured parking to replace the event parking that otherwise prevents the vitalization of the eucalyptus and arboretum areas.

Lasuen Area (CSSG Project 5d)

This is the remaining triangular parcel formed by Lasuen Street, Arboretum Road and the Galvez/Toyon site. This 10 plus acre site also represents a very attractive development or restoration resource to meet the school's needs. Ideally, its design and development would be coordinated with the surrounding parcels.

NE Arboretum area (CSSG Project 5e)

This area, generally assumed to be between Arboretum Road, Galvez Street, and the setbacks from Palm Drive and El Camino Real. This 13 plus acre site represents a very attractive development or restoration resource to meet the school's needs. Ideally, its design and development would be coordinated with the surrounding parcels.

SW Palm area (CSSG Project 5f)

This area is defined by the Palm Drive setback, Quarry Road, Arboretum Road minus the mausoleum and parking areas along Quarry Road (as these lots are already considered part of the Campus development area in the GUP). Like the other sites in this area noted above, it represents a special opportunity to both restore the landscape elegance of the campus entry road and new development sites to service this useful central campus location.

Improved Development Management

Off-campus Sites

Overview

Over the years, Stanford University has developed or leased for development by others, various off-campus sites. More recently, the school has decided not to pursue developing faculty or student housing along the Sand Hill Road corridor in favor of leasing these lands to private developers.

This treatment of an otherwise useful resource has forced the University to now consider the severe alternatives represented in the CP/GUP proposals. One view could be that the university would rather develop its open space than its residential lands along Sand Hill Road.

Page 11

Examples

The following are examples of adjacent market-rate housing being developed on Stanford owned lands (Source: Ken Schreiber, Palo Alto Planning Consultant to Sand Hill Project in a July 21, 2000 conversation with CSSG's Richard Harris)

Oak Creek

Project Description-

34-acre site, developing something in excess of 759 units;

Occupancy-

Market rate rental units; studio, 1 & 2 bedrooms; rental rates between 1925-2125 studios to 3815-3995 for 2 bedrooms.

Stanford currently houses 47 students at Oak Creek at subsidized rents (i.e., students pay student housing rate rents to Stanford, the University then pays rent to Oak Creek).

Stanford Land Lease-

Original ground lease (these are scheduled to expire in 2018) in 1959, changed in 1968 to expire in 2018.

In 1997, the lease was extended to expire in 2048. Stanford was granted a "right of first offer" to purchase the ground lease. The definition of which has not been disclosed. The DEIR should investigate the terms and definitions associated with this lease to determine the feasibility of Stanford repurchasing this facility.

Stanford West Apartments

Project Description-

Located just west of the Stanford Shopping Center on the west side of Sand Hill Blvd.

628 units on 46-acre site (32-34 ac of which is buildable, the balance considered a Native American archaeological site).

Units- mix of 1, 2, 3 bedrooms in 3-story buildings; rental rates not yet set.

Construction schedule- 60 units in phase 1 completed September 2000; entire project completed by September 2001.

Occupancy

The units will be rented at market rates except for those set aside for Section 8 Low-Income occupancy. The number of Section 8 units will be determined by a sliding scale starting at 10% of the units in phase 1 (September 2000) increasing to 25% over a 10 year period.

Rental priority will determined in the following order:

- First- any full time Stanford employee (full time is 30 plus hours per week);
- Second- employees of Stanford's commercial tenants
- Third- people who live or work in Menlo Park or Palo Alto;
- Last- everyone else No discounts for Stanford faculty or staff

Stanford Senior Housing

Project Description

Units- 388 independent living units

Buildings- 4-5 stories

Schedule- to start after the Stanford West Apartments and be completed by 2002 and fully occupied by 2004

Occupancy

Full market rate rental units, no discounts for faculty, etc.

Stanford recently considered this site for faculty housing but decided not to develop in favor of leasing the land to a private developer.

Existing Lease Re-evaluations

Overview

Stanford University over the years entered in to a host of ground lease agreements for, among other things, various residential projects and sites near the campus.

These leases continue to be renewed and extended without regard to their potential to provide needed faculty and staff housing.

Examples

Stanford Hills

This is a 1960's style upper-end ranch house single-family sub-division in nearby Menlo Park, originally part of the Buck Estate.

The original 99-year leases may expire in another 50 years.

Stanford should utilize these long-term lease projects to meet its future housing demands. Additionally, the university should consider actively attempting to re-purchase these leases as they become available. Such lease acquisitions may accelerate the availability of new faculty or staff housing inventory.

Re-allocate Existing Housing Inventory

Overview

Stanford already owns and manages a large number of on-campus housing to serve the needs of faculty, staff, graduate and undergraduate students.

The university housing management should re-evaluate the occupancy and use of each housing unit and category. The result of such an evaluation may result in a shifting or re-allocation of residents from one facility to another as needed to meet current housing demands.

Examples

Searsville Residences

The CP/GUP calls for the redevelopment of this site replacing the existing 13 faculty units with some 250 grad-student housing units.

Grad-student housing may or may not be the best occupancy designation for this site but the idea of shifting the residential use designations as

Page 14

needed to meet the university's housing mix requirements is supported by the CSSG.

Occupancy Flexibility Needed

As the student population balance continues to shift from undergraduate to a majority of graduate level students on campus, the housing mix should also shift. However, most grad students have different housing requirements which means the units are not immediately or directly convertible from one occupancy to the other. It may be useful for the university to consider developing the majority of new student housing in a manner primarily suitable to the graduate student rather than the undergraduate.

Preserve and Enhance Open Space

Open Space Preservation

Protect and Enhance Existing Open Space

The university is fortunate to have such an extraordinary amount of quality open space in close proximity to the campus core. This wonderful asset should be better utilized and enhanced to provide more nature/wildlife opportunities and programs.

Environmental Considerations

The existing Open Space areas are rich in a variety of wildlife flora and fauna. These natural resources should be protected and preserved. In particular, the golf course as an existing California Tiger Salamander habitat, should be maintained as golf course in lieu of the ill-conceived and as yet ineffective mitigation zone artificially created east of the golf course, south of Junipero Serra Blvd.

Campus Buffer

The Golf Course and adjacent open spaces have served as a buffer to the surrounding community for over 70 years. The Golf Course has also served as an effective campus growth boundary during this same period. It should continue to serve both functions.

Recreation Facilities Enhancement

One significant and rather unique quality about the Stanford campus is that its campus core is surrounded by a variety of open space uses. It is especially unique to have an outstanding golf course and other recreational facilities in close proximity, i.e., within walking distance, to the campus core. This relationship enables the school to preserve its "mind and body" enrichment philosophy.

August 7, 2000 Page 16

TOWN of PORTOLA VALLEY

AUB

August 7, 2000

Ms. Sarah Jones, Planner III Planning Office Santa Clara County Government Center, 7th Floor 70 West Hedding Street San Jose, CA 95110 00710-3 7511:52

COUNCIL: Edward C. "Ted" Driscoll, Jr.-Mayor Kirke Comstock-Vice-Mayor Craig M. Brown Ed Davis Nancy Vian

> TOWN OFFICERS: Alex D. McIntyre Town Administrator Sandy Sloan Town Attorney

Subject:

Comments on DEIR for Stanford University

Draft Community Plan and General Use Permit Application

The Portola Valley Planning Commission considered the referenced DEIR at its meeting on August 2, 2000. The commission appreciates the opportunity to comment on the DEIR that addresses this major and important project.

First, we appreciate the significant proposals made by the county planning staff to help mitigate some of the impacts of the project that are set forth in the section entitled "Alternatives to the Proposed Project." To a large extent we support the recommendations and would suggest some stronger measures in some instances. Our comments relate largely to the potential impacts of the project on the Town of Portola Valley and its residents.

- We strongly support the substitution of the category of "Open Space and Field Research" for most of the hills for the category "Open Space and Academic Reserve." The latter term is so vague as to provide little definition to the uses that would ultimately be appropriate in the area. Beyond this comment, we suggest that the DEIR should find the draft community plan inadequate since it does not provide guidance as to building intensity. Court cases, including the *Twain Harte* case, have ruled that a valid general plan must provide an adequate definition of building intensity. The suggested change in designation would be a step in this direction.
- 85-2 2. We support the alternative Academic Growth Boundary AGB-B, but would suggest that the DEIR investigate excluding the golf course north of Junipero Serra, and classifying that part of the golf course as Campus Open Space. This would help ensure the continuance of the golf course rather than raising the question of its potential relocation to the hillside areas.

In addition, since one of the fundamental principles of the county's general plan is that urban development should occur only within urban areas, and since Palo Alto's Urban Service Boundary does not include the golf course, such changes as suggested in the prior paragraph would be consistent with the county's general plan policy.

85-3 3. The DEIR does not discuss the mechanisms that would help secure the open spaces in either the main campus area or the foothills. Easements, for instance, should be considered that would cover either a significant period of time, such as 25 - 50 years, or be permanent. In addition to campus open spaces, this might include areas designated as Open Space and Field Research and areas noted as Special Conservation.

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- 4. The DEIR should consider alternatives that would significantly cluster development in the area north of Junipero Serra Blvd. Options would include multi-story garages and use of open areas that exist on campus. This would require higher densities in some areas, but would be compensated for by setting aside the hillside areas as permanent open space.
- The Reduced Project Alternative appears to be rejected since it doesn't eliminate identified impacts. CEQA, however, addresses the importance of reducing impacts. The DEIR should identify and quantify the reductions to the greatest extent possible.
- 85-6 6. The DEIR 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, thus reducing traffic and air quality impacts.
- **85-7** 7. Attention to biologic matters is weak in a number of areas. Some of the weaknesses are:
 - a. There is virtually no field survey information for the "Lathrop" and golf course areas, other than for the Tiger Salamander, both of which areas area proposed to be added to the academic campus.
 - b. Setbacks along creeks claim to mitigate Red-Legged Frog impacts but disagree with US FWS standards for the frog (150 foot as compared to 300 foot setbacks).
 - c. Sensitive habitats on the existing core campus, other than the Tiger Salamander, are ignored, such as small wetlands.
- 85 -8 8. 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.
- 85-9 9. The DEIR should provide more attention to water usage. As Stanford approaches its limit from Hetch Hetchy, there will be pressure to draw more water from Los Trancos and San Francisquito Creeks, thereby endangering the stream habitats and affecting fish, amphibians, etc. In addition, the DEIR should consider the use of recycled water as a mitigation measure, especially for irrigation.

Sincerely

Craig Breon, Chair

cc. Ted Driscoll, Mayor



August 7, 2000

County of Santa Clara
Environmental Resources Agency
Planning Office
70 West Hedding Street
7th Floor, East Wing
San Jose, CA 95110

Attention: Sarah Jones, Associate Planner

Subject: File No. 7165-07-81-99GP-99P-99EIR

Stanford University Community Plan/General Use Permit

Dear Ms. Jones:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft Environmental Impact Report (DEIR) for the proposed Stanford University Community Plan and General Use Permit that would allow the following amount of development to occur in the next 10 years:

- 2,035,000 square feet of academic and support facilities;
- Up to 3,018 units of student, faculty and staff housing;
- 2,873 additional parking spaces; and
- 2,201 additional students, faculty, and staff.

VTA has the following comments on the transportation impacts and mitigation measures proposed in the DEIR:

Eco Pass

VTA appreciates the inclusion of a Universal Transit Pass in the list of additional measures to be considered to reduce transportation impacts.

Palo Alto Caltrain Station

The DEIR indicates that the project "would add very little increase in transit usage." It also states that the "existing transit facilities and services have sufficient capacity to accommodate the increase in transit trips." It should be noted that the Palo Alto Caltrain Center and Transit Center is currently at capacity and that there is a multi-agency study to improve the facility. Because the project will increase demand on this facility. VTA

County of Santa Clara August 7, 2000 Page 2 of 2

requests that the DEIR be revised to include financial participation in the improvement of the Palo Alto Caltrain Center.

Bus Stop Improvements

The DEIR states that the project will cause impacts at a total of 17 intersections. VTA may have bus stops at some of the affected intersections that will be delayed by the increased congestion. VTA requests that the intersection improvements mentioned in Tier 1 (TR-5A) and Tier 2 (TR-5D) be modified to include bus stop improvements where bus stops exist to improve transit operations.

Line 22 Rapid Bus Corridor

86-3 VTA requests that the DEIR 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.

Parking

The project proposes to add 2,873 additional parking spaces. The DEIR states that "while to some degree the provision of parking facilities encourages automobile use, not providing sufficient parking coule result in Stanford commuters parking within the surrounding neighborhood." VTA requests that the DEIR 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 facilities.

Thank you for the opportunity to provide comments on the DEIR for the Stanford University Community Plan/General Use Permit. If you have any questions, please call Christina Jaworski of my staff at (408) 321-5751.

Sincerely,

Derek A. Kantar

Environmental Program Manager

DAK:RM:CTJ

cc: Roy Molseed, Senior Environmental Analyst

SANTA CLARA VALLEY WATER DISTRICT FACSIMILE TRANSMISSION 13 - 7 11 4: 31

Ms. Sarah Jones County of Santa Clara Planning Office Seventh Floor, East Wing 70 West Hedding Street San Jose, CA 95110

August 7, 2000

Dear Ms. Jones:

Subject:

Stanford University Community Plan/General Use Permit, County File No. 7165-

07-81-99GP-99P-99EIR

Santa Clara Valley Water District (District) staff have reviewed the Draft Environmental Impact Report (DEIR) for the subject project. We have the following comments:

- 87-1 1. The District appreciates the consideration of hydrology in the substantial detail shown in this report. In its engineering studies, the District considers the 72-hour 100-year storm pattern. We believe that this provides a more accurate picture of the results of potential rainfall events. We recommend that the 72-hour event also be considered when evaluating mitigation for runoff. We further recommend reviewing the District's Matadero Creek Engineer's Report for additional information on expected water flow in Matadero Creek. This information indicates that the flow in Matadero Creek from the 72-hour 100-year event will be approximately 2000 cubic feet per second (cfs) downstream of Foothill Expressway, differing from the 600 cfs from the 24-hour 100-year event reported in the DEIR, page 4.5-16.
- 87-2 2. In regards to the detention basins proposed as Mitigation HWQ-1, this concept of mitigation for increased impervious surface is acceptable. Whichever alternative detention basin design is selected, site-specific or watershed-wide, the proposal must be reviewed by the District in its capacity as flood control agency for Santa Clara County. Any proposal must include calculations for the peak flows and volumes, management of flows resulting from lesser frequency events. Also provide the inflow and outflow hydrographs, routing, storage design of the outlet and spillway, operating and maintenance procedures, and discuss safety considerations.
- Also, detention basin design, as well as other hydrologic studies, should consider storm and flooding events more frequent than the 100-year event to properly evaluate the results of development. If detention basins are designed considering only the 100-year event, flooding could still occur during more frequent events, depending on the basin design. The timing of flows is crucial to the operation of successful detention basins.

- 87 -4 4. In mitigating flooding, measures should be considered to reduce flows from the more frequent storms, whether by detention basins or other means.
- The District has previously discussed with Stanford the use of a 20-acre portion of the project bounded by Foothill Expressway northerly, Page Mill Road westerly, Coyote Hill road, southerly, and Deer Creek easterly as off-stream storage and potential habitat enhancement for several endangered species. The lands are shown designated (Figure 2-4) as Open Space and Academic Reserve and as Special Conservation. Under existing conditions, these designations are compatible with our proposed use. However, we request that no individual project that would remove this area from future use as the District has proposed be put forth until our discussions are resolved.
- Watershed- or subwatershed-scale detention facilities may create opportunities for partnering among the District, the County of Santa Clara, and Stanford University. For example, as discussed in Comment 4, above, the District sees the potential for off-stream storage on Matadero Creek upsteam of Foothill Expressway.
- We note that an additional mitigation for Impact HWQ-1 is appropriate site design.

 Decreasing runoff from any given site will partially relieve the impacts of development.

 We suggest consideration of site design as presented in the Bay Area Stormwater

 Management Agencies' Start at the Source-Design Guidance Manual for Stormwater

 Quality Protection and Site Planning for Urban Stream Protection, prepared by Tom

 Schueler, the Center for Watershed Protection, for the Metropolitan Washington Council

 of Governments, among other documents.
- Regarding groundwater recharge (IIWQ-2) and groundwater quality (HWQ-3), it is acceptable to evaluate loss and replacement in kind of recharge as proposed. We caution that runoff to be used for recharge should be a appropriate quality to avoid pollution of the groundwater resource. As with detention basins, the District must review and approve any proposed recharge facility.
- 87-9 9. The comment regarding abandoned wells and the necessity to locate those is appropriate (Impact and Mitigation HWQ-3). Please contact the District's Wells Services for additional information on locating and properly destroying inactive wells.
- Regarding impacts to surface water quality from construction (HWQ-4), we note that, in accordance with the revisions to the Clean Water Act, the National Pollutant Discharge Elimination System for storm water will require permit compliance for construction sites greater than or equal 1 acre as of March 10, 2003. Currently, although a notice of intent to comply with the Construction NPDES Permit is not required for sites smaller than 5 acres, construction sites of any size may not allow pollutants to enter or threaten to enter watercourses.

- 87-11 11. In the third bullet item on page 4.5-20, Impact HWQ-4, it is stated that construction sites will be visited once per month during rainy seasons by Stanford staff. It should be recognized that this is not a substitute for monitoring of control measures prior to and during storm events.
- We note that post-construction control measures or best management practices may mitigate potential groundwater contaminates (HWQ-3). We appreciate the consideration of grassy swales and vegetated filter strips for parking lots.
- As stated in Mitigation PS-1C, Water Conservation and Recycling, anticipated water consumption will increase above Stanford's existing allocation, and that water conservation and recycling is proposed to offset that shortfall. We note that the use of recycled water in the unconfined areas may require monitoring for groundwater quality.
- 87-14 14. It is possible that, if additional water is not available from Hetch-Hetchy during a dry period, for example, Stanford may extract groundwater for potable or irrigation use. However, we would caution against overdrafting. It is also possible that in the future, District treated water may become available to service the City of Palo Alto and Purissima Hills Water District. In that case, Stanford may consider availing itself of that service.
- Regarding Biological Resources, please define the minimum widths and other qualities of the Special Conservation (E-SA-SC) buffers along streams and between land uses. For example, will the buffers be thickly planted to better serve as visual buffers, managed for wild life habitat, or mowed as fire breaks? Also, are any new agricultural uses proposed?
- 87-16 16. The District supports protection of California Tiger Salamander habitat, specifically including BIO-1 (a) through (e)—Option 2: the Alternative Mitigation Program that provides a less than significant impact after mitigation and is not proposed by the applicant (pages 4.8-32 through 4.8-34).
- As stated previously, in accordance with District Ordinance 83-2, any construction, demolition, grading or landscaping proposed within 50 feet from the top of bank of a District watercourse is subject to review and the issuance of a permit prior to commencement of work.

Thank you for providing us the opportunity to review the DEIR for this project. If you have any comments or questions, please call me at (408) 265-2607, extension 2259.

Sincerely, William C. Springer, P.E.
Associate Civil Engineer
Community Projects Review Unit

Pris Grayes 2130 Yale Street Palo Alto, CA 94508 7 August, 2000

Ms. Sarah Jones Planning Office, County of Santa Clara 70 West Hedding Street San Jose, CA 95110

Re: Stanford University Draft Community Plan and General Use Permit Application, Draft Environmental Impact Report

Dear Ms. Jones:

The Draft EIR responds to my letter of 17 December, 1999 (letter H), comment #11, regarding the original Palo Alto Airport location on Stanford lands near Stanford Avenue and El Camino Real by stating that "Research into historic sites uncovered no evidence of this use". I attach copies of text and two photographs which refute this finding.

The first photo, from <u>Streets of Palo Alto</u>, published by the Palo Alto Historical Association, 1991 Revised, shows College Terrace looking toward the Stanford Stadium. The airport is clearly visible between Stanford Avenue and Serra, extending south-west from El Camino Real.

The second photo and text are taken from <u>Paio Alto.</u> A <u>Centennial History.</u> by Ward Winslow. This volume was also published by the Paio Alto Historical Association, 1993. This text documents that "Lt. Norman Goddard opened the Paio Alto School of Aviation in 1928 on Stanford land near the corner of Stanford Avenue and El Camino Real." The airport was used by the U.S. Department of Agriculture's division of forestry from 1929 until 1934. It continued to be used for general aviation until the municipal airport was opened in 1935 in its current location.

- 88 -1 Once again, I request that possible remains of this cultural resource be evaluated in the Environmental Impact Report.
- As a preservationist (and president of Palo Alto Stanford Heritage), I must also question how the consultants drafting the EIR could have found "no evidence of this use." What type of "research" did they do? It is very apparent that did not speak with Steve Stalger, Palo Alto's historian or search the archive files located in our main library. I am extremely concerned that research of cultural resources is being entrusted to a group that does not understand how to do such research. The documentation I have provided is widely available and no great effort should have been required to locate it.

Regards,

Pria Graves Cc: Joseph Simitian



College Terrace about 1930. An airport was located between Stanford Stadium and the Terrace.

COLUMBIA STREET in College Terrace was named for Columbia University, New York City, established in 1754.

COMMERCIAL STREET is one of three streets located in the extreme southeast corner of Palo Alto which were apparently named for their intended usage. The other two are INDUSTRIAL AVENUE and TRANSPORT STREET.

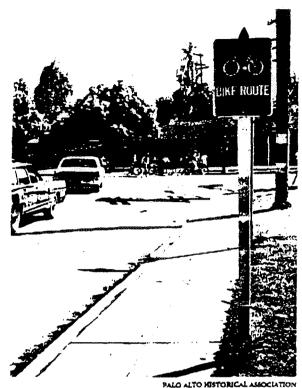
COMMUNITY LANE is an alley adjacent to the Lucie Stern Community Center. It runs intermittently between Harriet and Newell.

CORINA WAY was named for Corina Kauffmann, the wife of Sam Kauffmann, the builder.

CORK OAK WAY. Dr. Emory Evans Smith, Assistant Professor of Horticulture, Stanford University, 1892-1896, introduced cork oaks to Palo Alto with the idea that they might develop into a cash crop. A Cork Oak (Quercus suber) is now growing at 3400 Cork Oak Way.

CORNELL STREET in College Terrace was named for Cornell University, Ithaca, New York, established in 1865. It was originally named Washington Street, but its name was changed when Mayfield was annexed to Palo Alto in 1925.

Struber Palo Alle



Signs such as this one at Newell and Embarcadero roads mark the system of bicycle lanes throughout Palo Alto.

In the 1920s, the police began enforcing an ordinance requiring lamps on bicycles ridden at night. Licensing began in 1936 with a fee of 25 cents per year. Between 1936 and 1948, records show, 13,236 bicycles were registered in Palo Alto.

Concern arose in the 1940s and 1950s over juvenile bicyclists' problems. Cycling safety was stressed at Bicycle Days at Rinconada Park. When a 1945 ordinance banning the obstruction of sidewalks by parked bicycles took effect, 14 offenders were caught on the first day. The first-offense penalty was two days without one's bike.

Bicycling's popularity surged anew in the late 1960s and, as in the 1890s, adults shared this interest. In 1967, the City Council approved bicycle-route streets through Palo Alto marked by signs, but the poorly planned routes were not popular with cyclists or the community. In 1972, a new 74-mile system of bike lanes was created, causing some conflicts with advocates of street

parking. In the mid-70s, bike bridges were built across San Francisquito Creek at San Mateo Drive in Menlo Park and at Waverley Street, and across Adobe Creek at Wilkie Way and other points.

Safety amid automobile traffic became a growing concern as more and more multigear bikes and mountain bikes appeared on city streets. Bicycle commuting became part of the city's transportation planning in the 1980s, championed by City Council Member Ellen Fletcher. The Bryant Street "bike boulevard" opened in 1982 to provide a safe, direct cross-town corridor for these commuters.

Palo Altans Take to the Sky

World War I created avid public interest in aviation. Palo Alto area people eager to try flying went up for rides in 1919 with Valdo H. Brazil from the Stanford flying field, and in the early 1920s with Ray Sullivan, whose aeroplane flights from a field on Embarcadero Road near the city waterworks (just east of Rinconada Park) cost \$2.50 each.

Lt. Norman Goddard opened the Palo Alto School of Aviation in 1928 on Stanford land near the corner of Stanford Avenue and El Camino Real. The field, with two hangars, a ground school, a small office and a strip of grass for a runway, was used by the U.S. Department of Agriculture's division of forestry as its flight center from 1929-34. One of the school's first graduates, Paul Mantz, won the world championship in 1929 for flying the difficult outside loop, and went on to become a stunt pilot in Hollywood. Goddard was killed at an Alameda County air show when the wings fell off a glider he was exhibiting. Mantz, too, ultimately died in a crash.

In the early 1930s, Palo Alto officials moved to establish a municipal airport on the bayfront. While that work was in progress, the air school decamped from Stanford, chased by a lawsuit filed by College Terrace residents who attacked it as a public nuisance and menace. Among the School of Aviation personnel making the move in 1935 was Jack Nystrom, who, together with his son, Jim, went on to log more than 50 years of family

Palo Alto A Central

Palo Altor A Centennial History



The original Palo Alto Airport was on Stanford land near the intersection of El Camíno Real and Stanford Avenue.

It was relocated to the baylands in 1935.



Air traffic controllers at Palo Alto Airport serve the general aviation needs of nonthern Santa Clara County.





SIERRA CLUB • LOMA PRIETA CHAPTER
San Mateo • Santa Clara • San Benito Counties

August 7, 2000 Via fax 408/279-8537

5 Santa Clara County Planning Office 70 W. Hedding Street, East Wing, 7th floor San Jose, CA 95110

Attn: Sarah Jones, Associate Planner

RE: Comments to Draft EIR on the proposed Stanford University
Community Plan/General Use Permit [#7165-07-81-99GP-99P-99EIR]

I am writing today to submit our comments to the Stanford University Draft Community Plan and General Use Permit Application Draft EIR. Our comments are as follows:

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A. Open Space

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In section 4.2, pages 16-21 and pages 26-27, the Draft EIR discusses the loss of recognized open space. First of all, a distinction should be made throughout the document between undeveloped open space and developed open space. The Plan and Draft EIR fail, in most cases, to note this distinction. The distinction is important in that undeveloped open space often provides for a richer habitat for threatened and endangered species that developed open space cannot adequately match. Furthermore, native flora is prevalent in the undeveloped foothills, yet obviously lacking in developed 'so-called' open space.

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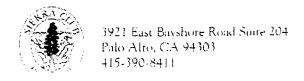
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We oppose new development in the foothills west of Junipero Serra Boulevard. The County should insist that Stanford's Plan be entirely consistent with the letter and spirit of the City of Palo Alto's Plan with particular attention to Palo Alto's Urban Growth Boundary. The Plan proposes development in the Lathrop Development District west of Junipero Serra Blvd. The Draft EIR notes that even after clustered development in the Lathrop District, there would be 'significant and unavoidable' impacts resulting in loss of open space. This is inaccurate, as these impacts are avoidable. 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.

35 impacts less than significant

The Draft EIR falls short of identifying realistic mitigation measures to reduce the Plan's significant impact on open space in the foothills.



89-4 B. Transportation and Traffic

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In section 4.4 page 90, 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 correctly asserts that despite attempts at proposed mitigation, automobile trips will significantly increase. However, we do not believe that the significant impacts are unavoidable. Alternative project scenarios could produce a noticeably less significant impact on traffic at the identified intersections. We urge the County to support an alternative that does not increase traffic congestion.

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.

C. Ecological Habitat for Threatened and Endangered Species

In section 4.8, the Draft EIR correctly notes that there are several threatened or endangered plant and animal species in and around the proposed development area. There does not appear to be enough information provided to conclude that Stanford's mitigation proposals would lead to less than significant impacts in any of the identified areas. Further, the Draft EIR asserts that after mitigation, only the California Tiger Salamander (CTS) would be subject to significant environmental impacts. And still further, the Draft EIR asserts that with the use of an alternative mitigation, the CTS would also be saved from significant impact. We disagree! Option 1 in Stanford's Plan does not offer the necessary enduring protection of CTS habitat because it relies on the 'management zone' as mitigation, which does not preclude future development, and hence does not provide long-term security for the species. Additionally, Option 1 does not guarantee that the new ponds will be effective before new development occurs.

We urge the County to undertake environmentally thorough studies to determine where best to expand the important and necessary 'Special Conservation Areas' that would allow for very limited development in the foothills in the EIR. The existing area are clearly not large enough to protect important species habitat.

Also please be aware that even though relevant endangered species and native plant laws may, in some instances, permit the State Department of Fish and Game to allow takings, the County is not required to allow endangered or threatened plant and animal species to be harmed. We urge the County to require that all endangered or threatened native plant species in undeveloped or minimally developed areas be fully and thoroughly protected.

D. Air Quality

- In section 4.11, pages 16-17, the Draft EIR asserts that there would not be a significant cumulative environmental impact on air quality. This entire section fails to take into account the air quality impacts of increased traffic in the Stanford/Mid-Peninsula area.
 - This is a serious flaw and must be addressed by the County as the planning process moves forward.
- Furthermore, diesel exhaust is a significant source of particulate air pollution. The Draft EIR does not include a thorough analysis of whether the technology exists to adequately
 - eliminate most diesel particulate matter. Furthermore, what enforcement and monitoring will exist to ensure that construction operators will adhere to clean air requirements? Finally, there is no comment on whether any of the new building will have diesel generators as back-up power sources. Stanford must be required to provide that information and the analysis must include detailed information and impacts on plans for
 - frequent testing of these back-up generators.

E. Alternatives

- Stanford's development proposal would result in huge environmental impacts on surrounding cities. These impacts should be fully mitigated, and if they can't be, then
 - the project should be significantly reduced in scale. We urge the County to study an alternative permanent academic growth boundary—consistent with Palo Alto's Urban Growth Boundary.
- 89-13 Stanford should not be allowed to sprawl its urban development beyond Palo Alto's
 - already established urban growth boundary. This alternative growth boundary would remove the 154-acre campus expansion into the foothills (Lathrop).
- We would like to see one or more reduced project alternatives to be studied more thoroughly. The EIR says that the project, when cut in half, would produce
 - adequately. Reducing the project in half would reduce the campus population growth from 2,200 to 1,100, the total square footage from 5 to 2.5 million square feet, the number of new parking spaces from 3,000 to 1,500. This almost certainly would reduce environmental impacts. The 'Environmentally Superior Alternative' currently selected in
 - 35 the EIR does not reduce the project size in any significant manner. The Environmentally Superior Alternative selected by the EIR should be enhanced to include a reduced project size, reduced new parking spaces, and reduced square footage overall.
- 89-15 The EIR should analyze what planning tools are available to permanently protect the
 - 40 foothills. Restrictive zoning, clustered development, developer agreements and the use

of conservation easements can be used to protect the foothills completely from future development.

F. Growth and Plan Consistency

- It appears that the Draft EIR lacks the necessary degree of specificity that County decision-makers (and the public) will require to make an informed and environmentally responsible decision.
- We do not support the Draft EIR's assertion that the Stanford Plan is consistent with the City of Palo Alto's Comprehensive Plan. We believe the Draft EIR is mistaken in claiming that Policy L-1 is consistent. Please provide a more extensive analysis and rationale for that assertion.
- The Draft EIR correctly points out that Stanford's Plan is growth-inducing. The impacts on already existing housing pressures and traffic congestion will likely be great.
- The County should study development performance measures. Stanford is proposing an unprecedented amount of development and it must be built from a foundation of reliable land use planning. The County should require the development to be higher density, with smaller building footprints. Development should be focused on redevelopment of older single story less efficient buildings, and structured parking should be required. Stanford has roughly 175 acres of surface parking lots. Stanford should be required to develop these into structures, freeing up more than enough land to develop housing without destroying valuable habitat or open space.

On section 7, page 55 the Draft EIR states that "significant unavoidable impacts occur in five different areas: open space, traffic and circulation, historic resources, construction noise, and growth inducement." It appears too easy to allow and go along with 'significant unavoidable impacts' through these areas. We suggest a more detailed analysis is needed and we urge the County to insist on the most substantial and effective mitigation measures possible, without regard to cost.

Thank you for taking our comments into account. We look forward to your responses.

35 Submitted by

Dan Kalb

40 Director, Sierra Club Loma Prieta Chapter

THE SAND HILL

August 7, 2000

Honorable Commissioners
Santo Clara County Department of Planning and Development
70 West Hedding Street
7th Floor
San Jose, CA 95110

Dear Honorable Members of the Planning Commission of Santa Clara County:

As required by the CEQA, and in conjunction with the obligations of the Santa Clara County Board of Supervisors and Planning Commission to conduct environmental reviews of any action involving potentially significant impacts. I respectfully submit my comments on the Draft Environmental Impact Report relating to actions proposed by Stanford University pursuant to Stanford's application for approval of a General Use Permit in the context of the Draft Community Plan and General Use Permit Application.

My comments basically align with Section 7 (Alternatives to the Proposed Project) and other relevant subsections of the DEIR, in which the full spectrum of logical and rational alternatives to the proposed action are absent from the document. On the basis of a glaring exclusion of a comprehensive infill focused design solution as the most logical alternative available to Stanford, I commend for your serious and thoughtful consideration the denial of any and all permits sought by Stanford linked to the proposed action as described in Section 1 (Description of Proposed Project) and the alternatives described in Sections 7.2.B and 7.2.C. Further, I propose that within the scope of the statutory authority vested in the County of Santa Clara, that approval of the General Use Permit Application be temporarily suspended, and that the County issue a moratorium on the submission by Stanford of any revised application until such time as the conditions summarized in Section 2.0 below are met by Stanford and found to be acceptable by the impacted cities, town, villages, and unincorporated areas within Santa Clara County, and that such moratorium be recognized as also providing gratis protection to potentially impacted communities lying within San Mateo County.

1.0 RATIONALE FOR RECOMMENDED DENIAL AND MORATORIUM

- 90 -1

 1.1 History, current status, and probable future responsiveness by Stanford to the greater community's rational and legitimate concerns. In my extended discussions with various members of the Palo Alto and Menlo park communities during the past several weeks, I have discovered a history of divisiveness between the academic and land development principals at Stanford on the one hand and impacted residents and senior Stanford faculty and administrators on the other. I have learned that repeated attempts by such respected scholars as Wallace Stegner (now deceased) and Gerg Treichel (retired) have consistently failed to alter the coarse of Stanford land developers. I witnessed this process personally in my first direct exposure to the Stanford development juggernaut during the Sand Hill project review. I was stunned by the audacity of the developers as they continued to ignore issues of profound importance to the future of the University, as well as the concerns of the local residents. I have concluded from these experiences therefore that it is imperative that Stanford be compelled to listen to a community that boldly and convincingly expressed its displeasure during the hearings of July 19 and August 3; a community united in its stance and supported unanimously by its representatives on the Palo Alto City Council on July 31, 2000.
- 90-2

 1.2 Timing of the current GUP application and its potential linkage to timing of the Stanford West and Stanford Mall expansion
 As a new "instant city" on Lower Sand Hill becomes occupied with more than 1,000 new residents over the next few months, and as many of these new occupants spill out of multiple new driveways onto the new 'untimited access' Sand Hill 'freeway' on their way to the Mall or to their job at Stanford (and likely the medical people will be the only ones not using their cars), we will all be watching and observing the differential between what was promised and what we will have to live with as the impacts begin to unfold. Adding to this new congestion will be the dynamic of the "rude" bridge 'blockade' on Sand Hill, where the roadway squeezes from four down to two lanes at the Menlo Park boundary. If I had been the proponent of the new GUP a project many times the size of the Sand Hill 'instant city' I too would have sought a hasty approval before the community had realized what was happening If I had perceived that Stanford West congestion would occur before approval of the GUP, I would have nervously anticipated a more strenuous objection than the basically polite and civilized statements made during the recent hearings. In fact, I might even have considered delaying the Sand Hill project further to avoid the embarrassment of "live" impacts during the GUP deliberations.

90 -3

1.3 Growth and Stanford - denial of limits to growth. The concept of growth is complex. Growth is a natural, biological and physical phenomenon that has all too often been equated with "good". Growth of a child to maturity is normal and good; unregulated growth of human cells is cancer and is not good. You get the point. In geo-spatial terms - that is, the quanta of the Earth surface to share, covet, protect, or destroy - variable patterns of human occupancy and movement are played out in dynamic scenarios among multiple layers of populations, living in sometimes unique but mostly repetitive physical patterns (i.e., suburban tracts, malls). Is Stanford seeking to become a combination of these two elements of urbanity that unfortunately define the American urban landscape. Stanford wants to remain a farm, but I'm afraid it's too late for that, and unless it controls its middle-aged spread, it will eventually lose its uniqueness and look like everyotherplace USA. Cities, towns, Stanford, villages, farms, all functioning with either growing, stable, or diminishing populations, ideally optimize their functions to fit their population levels.

Growth in population is often incorrectly perceived as a function of land availability. As we will see below, gross land availability has almost nothing to do with population levels. But before looking at the issue of density as relating to function, I will discuss land in the context of the traditional notion of tenure. In Western or Euro centric cultures, tenure refers to legally sanctioned, private "rights" to occupy or reside on as well as to alter the land surface or sub-surface. Some land carries with it the opportunities and burdens of shared space ("the commons").

Stanford, while clearly the legal 'owner' of the land on which it holds the title is the dominant and in fact the defining entity within the community of Palo Alto. As such, Stanford is burdened by an ethical, if not strictly legal requirement to behave, not as a monolithic dictator but as an honorable, perceptive, caring, and intelligent neighbor. However, Stanford, due in part to its size and visual dominance, is one of those unique institutions in which the line between private and public is somewhat blurred. This can be quite confusing and it is not clear that Stanford agrees with this conclusion, as we all were summarily reminded by a speaker offering comment during the August 3 hearing before the Planning Commission - and I paraphrase: 'Stanford is private land and therefore we (Stanford) can place restrictions on the public's right to access or otherwise use or secure value from OUR land, beyond the visual, which we (Stanford) are happy to share'. I breathed a sigh of relief as I could not imagine a visual barrier fence, or worse—the CHP issuing citations for "side glancing" while driving along 280 between Sand Hill and Alpine. At this point, I am tempted to raise the question of just "who" is Stanford, but I shall deflect this question to those who know, better than I, the various voices of the university.

As the legal owner of the land on which most of the University is situated, there is no question that Stanford has the right to restrict access and to otherwise protect itself from external insults, be they the result of actions by casual visitors, trespassers, squatters, or corporate polluters. By the same logic and in many cases, by the provision and availability of statutory relief. Stanford does not retain an unencumbered reciprocal right to 'trespass' on its neighbors, or otherwise restrict or harm its neighbors, without providing the equivalent of just compensation, or at least mitigation of impacts, including the intelligent, sophisticated, and inclusive planning of such magnanimous adventures as is proposed in the GUP. By way of its expansionist, outward trending policies and development programs. Stanford is harming its neighbors in the same way that any ill-conceived, sprawling subdivision harms by its visual insult, for example, or even harms itself by fostering conditions that exacerbate anti-social or isolationist tendencies among its residents. (e.g., the suburban "Stepford Wives" syndrome) Not all isolationist qualities imply psychoses or criminality – some are simply counterproductive to knowledge building, which is increasingly based on interdisciplinary collaboration. This is where Stanford's thinking about its physical and geo-spatial environment should be

Aside from the quanta of land, another complex issue involving land occupancy and use is density. An clusive issue, on the one hand, density is defined by ecologists in terms associated with dynamic carrying capacity (i.e., density fluctuates on a diurnal, seasonal, or other temporal pattern (i.e., availability of food) and is ideally optimized to "fit" the capacity of the environment to absorb the impacts of the occupiers while sustaining its inherent qualities; on the other hand, an economist relates to density in terms of macro economic principles expressed by rates of productivity or consumption, or by import/export balances, or by supply vs. demand, etc. A city defines density in terms of numbers of individuals per unit area; a city generally has a higher density than a town, than a village, than farmland or parkland. A non-commuter based college or university often carries significantly higher density than a city at large. And why - because a university is a densely concentrated community of scholars, in which the success of the institution is increasingly measured by the results of collaboration or sharing. Stanford is reportedly the world's largest university in terms of contiguous land area. Stanford is, at the same time, one of the world's loneliest institutions of higher learning.

However, by reversing the centrifugal growth trends presently dominating its alternative futures defining policies, Stanford, by creatively infilling and increasing the density of its core, will achieve the dual positive result of providing for: 1) substantial internal benefits through the concentration of its academic and residential programs into a form conducive to a higher level of intellectual collaboration – creation of the new "yard" and "square" for the 3ed Millennium; and 2) reduction of internal costs to itself by increasing efficiencies in all functional categories, including reduction in time displaced (lost) through greater proximity of all academic/life way functions.

Stanford's present day 'land stewards', in the spirit of Reverend Fallwell's recent denial of global warming, have denied that unfettered and endless growth may have adverse consequences in a world in which the smart corporations are turning to sufficiency as one of their guiding principles. Stanford has slipped into the competition trap by adopting the philosophy that growth is an inalienable right – a given - and therefore, growth must be good, if not 'a

good', as in a commodity. Consequently, Stanford has adopted a very low density, suburban-style, land consuming, growth model, based more on the automobile dominated junior college approach than the enlightened approaches engaged by a 'typical' Great University. Herein lies the flaw in Stanford's development approach. As Stanford continues to bulge at its perimeter while lonely leaves blow in the breeze across its unwalked core paths, this sprawling, energy-consuming mega-campus will become even lonelier, while in the surrounding community, jam-packed with new condos and apartments in the visually numbing "Stanford West" typology, beleaguered residents drown under the weight of 20 minute grid locks at all intersections at noon, as the citizens of this once bucolic community become angrier by the year, is it all because Stanford is growing in the wrong way in the wrong places?

90 -4 1.4 The Win-Win option - framework of a solution

1.4.1 What should Stanford do?

The growth issue discussed in Section 1.3 above is the centerpiece of my rationale for recommending permit denial and a moratorium on approval of the GUP until such time as Stanford agrees to the various Conditions outlined in Section 2.0 below. Stanford will, of course either: 1) ignore these Conditions (if they are not sanctioned by an explicit finding and mandate by the County in its authority over certain aspects of Stanford's development rights and privileges, or, 2) strenuously object to any sanction placed by the County in which Stanford is compelled to consider these conditions seriously and is therefore required to take steps toward meeting these requirements. In the first instance, Stanford wins the battle, but loses the war. In the second instance, Stanford loses the battle but the war does not take place and all parties win. Unless of course, Stanford elects to bring suit against the County to void any such invasion of there presumed rights. I shall not speculate on the probable resolve of such a legal challenge, however, Stanford should not assume a favorable outcome as a given.

90-5 1.4.2 Designing a solution.

I have discussed a series of design centered activities with various members of the greater community and have received overwhelming support for the concept of a two-day seminar focusing on the issues discussed in this commentary, and taking place within the next several weeks, followed by a multi-university/professional concept design studio, based jointly at Harvard and Stanford, but also involving Berkeley, Penn, Santa Cruz, and several design offices, led by Sasaki Associates. The intent of the two-day seminar will be to scope the major issues and begin the process of detailing an alternative development process that will enable Stanford to meet the challenges defined by the conditions specified in 2.0 below.

2.0 Conditions:

To reinstate the GUP, the University, broadly represented by the office of the President, the Trustees, the Faculty, the Students, as voting members of a campus consortium, and Stanford Development, as an advisory, non-voting member, must reach a joint agreement between Stanford and members of the community as well as representatives of the Communities of Palo Alto, Mountain View, Menlo Park, Portola Valley, Woodside, Los Altos Hills, Redwood City, and Atherson, and other stakeholders within Santa Clara and San Mateo Counties. Stanford shall agree to:

- 2.1 retain an "advisory" design team and to incorporate a process for the creation of an alternative core campus development strategy based in part on a comprehensive in-fill policy including the full utilization the arboretum ('the patch') and all other infill opportunities in the core
 - 2.2 Develop an amenable 'town-gown' integration/sharing/outreach plan on the Harvard Square Model
 - 2.3 document all elements of the growth-maintenance

plan, including specific site and structural schematics

- 2.4 A specific and documented growth rate, population, and density caps
- 2.5 Secure in perpetuity permanent open space above Junipero Sera Blyd.
- 2.6 Seek options to purchase additional type areas in Woodside, Portola n Los Altos Hills
- 2.6 no location, structural or other change to golf course
- 2.7 prioritize in-core student housing
- 2.8 invest in alternative World-class arboretum in Portola Valley, Palo Alto, or Woodside in suitable

3.0 The following observations, notes, and commentary were recorded by Dennis during the three public

The following are abstracted from my field notes

Build	ina	inwar	
Stan	ford	must	

Stanford must build inward, not outward as a car-crazed junior college might. And it must physically build :d ie

inward by creating clusters of academic, residential, and service elements, linked by state-of-the-art people moving systems (i.e., no cars in "the yard"), in that mysteriously sanctified no-mans land that I have dubbed the 'Australian weed patch' - the untouchable area that disjoins the Village of Palo Alto from the half-a-pie core of the inner core of the campus. The "pie" needs to be filled in, and the base of the foothills must be the line in the sand.
I propose that the so-called 'arboretum' extending along and on both sides of Palm Drive be rededicated as filling the remaining "half circle" of the campus core and thus creating a 'commons' and 'yard', with 2,500 new residences for students and faculty, and associated academic and service/commercial clusters built in the arboretum in sinewy castle-like clusters on each side of the new Grand Alee (Palm Drive). This loneliest of the great academies can then be knitted together as a community of collaborating scholars
Design team assemble a design team that would not only retain but would add additional landscaping and produce a vibrant academic and living environment that both the community and Stanford would be proud of
with the assistance of the best architects, landscape architects, systems theoreticians, humanists, and scientists, engineers, historian, poets, and other artists - we will design and build an academic 'Bilbao" that will stand for five thousand years.
Continued critique and summary

lines in the sand and say, as Portland, Oregon has done - and as a few of our local

Sincerely yours,

R. Dennis Reinhardt

٣.

SAND HILL ENTERPRISES
STUDIO AND OPERATIONS
497 SEAPORT COURT, SUITE 102A
REDWOOD CITY, CA 94063



PALO ALTO UNIFIED SCHOOL DISTRICT

25 Churchill Avenue • Palo Alto, CA 94306 Telephone: (650) 329-3737 • FAX: (650) 321-3810

OFFICE OF THE SUPERINTENDENT

August 7, 2000

Santa Clara County Department of Planning and Development 70 West Hedding Street San Jose, CA 95110

Re:

Stanford University Draft Community Plan and General Use Permit Application Draft Environmental Impact Report State Clearing Housing Number 1999112107

Dear Ladies and Gentlemen:

The Palo Alto Unified School District ("PAUSD") is submitting this letter to comment on the Draft Environmental Impact Report for the Stanford University Draft Community Plan and General Use Permit Application. PAUSD's comments are limited to comments on the impact of the Project on schools.

- 91-1 The information contained in Table 4.10-1 is the enrollment projections 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 DEIR.
- 91 -2 The reference to the Lapkoff and Gobalet study on page 4.10-16 should be September 28, 1999, not September 2, 1999.
- 91-3 The last partial paragraph on page 4.10-17 contains incorrect enrollment numbers. The corrected text should read as follows:
 - 1. Projected enrollment through 2010 under the District's Medium forecast is 5,082 for elementary schools, 2,680 for middle schools, and 4,202 for high schools, or 11,985 students total. [delete next sentence in original text: 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.] Enrollments are expected to peak between 2010 and 2011. The addition of 239 to 584 students from planned University housing will increase total enrollment by 2.0 to 4.9 percent by 2010. Enrollment projections...
- The DEIR document discusses indirect effects of building additional graduate student housing, but dismisses them because such effects have not been measured in the past. But even though effects have not been measured, they certainly exist. It is unrealistic to expect NO enrollment effect on units. Some graduate students who would otherwise live in Palo Alto will move to oncampus housing, freeing Palo Alto housing for occupancy by some families with school-aged children. The District's demographer provided an estimate of the likely enrollment effect of the new graduate student housing. The effect of increasing on-campus graduate student housing could be measured more accurately with sufficient data resources, such as the addresses of current graduate students living in Palo Alto.

- The DEIR states at page 4.10-16 that the DEIR need not consider the impacts of the Project on a school district's ability to accommodate enrollment as an environmental effect under CEQA. This statement is based on the Goleta Union School District v. Regents of the University of California, 37 Cal. App. 4th 1025 (1995) case. The DEIR misstates the holding of that case and thus mischaracterizes the degree to which the DEIR must consider impacts. The Goleta case found that the impact of a project on school enrollment is a socio-economic impact which, under CEQA, is not required to be analyzed or considered significant, unless the increase in enrollment would result in physical impacts, such as the need to construct additional classrooms or increase busing. In the Goleta case there were methods for resolving the increased enrollment, which would not have had physical impacts, such as year round school. The DEIR makes clear that the PAUSD will need to construct new classrooms to accommodate the growth in enrollment projected from the Project and that this could have physical effects. Thus, the findings of Goleta, that school enrollment impacts need not be considered, is inapplicable to this DEIR.
- 91 -6 The DEIR 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 than significant. Additionally, the DEIR seems to imply that the agreement with Stanford and PAUSD could replace the school impact fees to be paid by Stanford. The agreement being contemplated between Stanford and PAUSD is not designed to replace school impact fees, but rather to supplement those fees in recognition that the increase in enrollment due to the GUP cannot be mitigated by school impact fees alone, since the construction of a new middle school will be required. Additionally, even with the execution of the Agreement with Stanford and the imposition of school impact fees, the cost of the new facilities required to accommodate the school enrollment projected as a result of the GUP will not be mitigated to a level of insignificance. The cost of construction of new school facilities far exceeds the school impact fees to be collected by PAUSD as a result of the GUP and the amount of any payment from Stanford. PAUSD will be responsible for funding the shortfall, which will be significant. Although Government Code Section 65996 limits the mitigations that can be imposed on a project to mitigate school impacts, it does not provide that the imposition of school impact fees mitigates impacts to a less than significant level. The DEIR must determine that the impact fees mitigate to a less than significant level by analyzing the level of fees projected to be collected versus the needs of the district to meet the increased enrollment. 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 DEIR does not provide sufficient information to determine if the impact fees mitigate the impacts to a level of insignificance since no analysis is provided.
- 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. The property tax exempt status of housing that generates students attending PAUSD schools places an additional burden on PAUSD since the district is required to educate these students without receiving any funding for the students. In addition, Stanford does not pay the utility use tax imposed on Palo Alto residents. This tax provides a source of revenue for K-12 education. Stanford's exemption from these various taxes needs to be analyzed in light of the projected enrollment increases.

Thank you for the opportunity to comment on the DEIR.

Sincerely,

Donald A. Phillips, Ed.D. Superintendent of Schools

cc: Karen Tiedemann Larry Horton



Stanford Campus Residential Leaseholders, Inc.

August 7, 2000

Sarah Jones
Santa Clara County Planning Office
70 West Hedding Street, East Wing 7th Floor
San Jose, CA 95110

Re.: Stanford University General Use Permit & Community Plan Draft Environmental Impact Report, 6/23/00

Dear Ms. Jones:

Unlike our neighbors in Palo Alto and Menlo Park, the Santa Clara County citizens who own homes on the Stanford campus have no municipal government representing their interests in the current environmental impact review process. The Stanford Campus Residential Leaseholders (SCRL) works to serve its community with volunteer board members and a part-time Executive Director, but lacks access to technical resources such as full time transportation staff who, in surrounding cities, work with their residents and through their governance structure to analyze and recommend improvements to the Draft EIR.

We therefore depend on County planners to ensure that the interests of these County citizens residing on campus are adequately recognized and evaluated in the review process. As would be expected from the CEQA guidelines, the focus of the Draft is largely on impacts on the surrounding communities. However, this is an unusual project both in scale and form, and the County's direct jurisdiction over the interests of campus residents suggests that expanded analyses, mitigations, and/or conditions of approval be carefully considered in areas where impacts appear to be significant or potentially significant for campus residents.

We would like to thank you and your colleagues for the work you have done to bring the Draft as far as it has come in this regard, and to offer our assistance in working with our community on further improvements.

The following are areas where we are aware that residents have serious concerns remaining:

Land Use
Open Space and Recreation
Population and Housing
Traffic and Circulation
Noise

Some of these concerns are described in the enclosed letters which we have received from campus homeowners, and in several attachments to this letter, which aggregate comments received on specific sections of the DEIR. As you begin working with the consultant on revisions, we would be happy to schedule a meeting or meeting(s) with you at your convenience to confer on some of the ideas that have been raised and help develop approaches that could make the final EIR as effective a foundation as possible for the coming decade of development.

If there is any other way SCRL can help with the process, please let us know.

Since I have

Yours truly,

James Sweeney, President

Stanford Campus Residential Leaseholders, Inc.

Cc: Supervisor Joe Simitian

ATTACHMENT 1

"TRAFFIC AND CIRCULATION" AND "NOISE" SECTIONS

4.4 TRAFFIC AND CIRCULATION

92-1 TR-2: Bicycle and/or Pedestrian. Will the project cause adverse impacts on the use of bicycle and/or pedestrian travel ways?

Figure 4.4-3, "Bicycle Facilities" shows Junipero Serra Boulevard and Stanford Avenue as Class III and Class II bicycle routes, respectively. The analysis states the impact of the project is "Less than Significant" and calls for no mitigation. Bicycle and pedestrian travel ways may well be impacted by the project as follows: 1) Intersection enlargements prescribed in Tier 2 mitigations may make bicycle and pedestrian travel less attractive and more hazardous. 2) Heavy construction vehicles enroute to and from job sites 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. Speeding vehicles in general contribute to a hostile environment for bicyclists, and excessive speeds are already recognized as a chronic problem on these two County roads. See also further discussion under TR-7 below.

The final EIR should evaluate these impacts and include appropriate mitigations, such as accelerated implementation of traffic calming measures, with fair share funding contributed by the applicant, and meaningful enforcement of truck routes. See TR-7E below, and "Unfinished Business" under Additional Comments below.

92-2 TR-3: Parking. Will the project create adverse impacts to existing parking or access to existing parking?

Since the last General Use Permit, Stanford has instituted a policy of requiring "SH" (Residents Only) permits for on-street parking in its internal, residential neighborhoods whenever requested to do so by a majority of area residents. This policy, and adequate enforcement to go with it, will be essential to prevent campus neighborhoods from becoming defacto parking lots for commuters, and should be required to be continued.

92-3 TR5-B: Trip Reduction and Monitoring.

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). See discussion above, TR-2. Development of west campus housing will further increase the need for a safer environment for bicyclists and pedestrians on Junipero Serra Blvd. Among other bicycle/pedestrian uses, access to Foothills recreation entry points from west campus requires travel on Junipero Serra Blvd.

92-4 TR-5D: Tier 2 Intersection Capacity Expansion.

It has been suggested that the County revise Tier 2 mitigations 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 could be conducted at the time the requirements are triggered.

See also oral commentary to the Santa Clara County Planning Commission (8/3/00), attached.

92-5 TR-6: Residential Streets. Will the project result in traffic impacts to surrounding residential neighborhoods?

TR-6A: Reduce Cut Through Traffic on Residential Streets

The analysis addresses impacts on Palo Alto and Menlo Park, but fails to address cut through traffic impacts to residential neighborhoods on campus. This should be corrected in the final EIR. 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

92-6 TR-7: Will the project create additional construction traffic causing a substantial reduction in access to land uses or a reduction in mobility?

The analysis states that addition of construction traffic would result in "reduction of access to land uses ... for a limited period of time." The 10- year span of the permit and the scale of the project suggest that the campus will be in construction mode for a substantial fraction of the coming decade, making this a sensitive issue with campus residents and neighbors alike. "Use of non-truck routes by construction traffic" is mentioned as one possible project impact. This has occurred with past projects, interfering with land use in the area, i.e., quiet enjoyment of residential leaseholds.

92-7 TR-7E: Construction Truck Routes

As a technical correction, Fig. 4.4-17 reflects <u>County-adopted trucking routes</u> (for the County roads in the area), in addition to the stated Palo Alto and Menlo Park routes.

The mitigation states that Stanford shall be required to adhere to the designated routes, but does not specify any mechanism for implementing the requirement. Use of non-truck routes has persisted in the past despite considerable efforts by Stanford to implement the prescribed routing through policy communications. Therefore, a dedicated enforcement program of 20 hours per week is requested, from the ground breaking of any construction under this General Use Permit though completion of construction. (This mitigation will, in addition, have beneficial effects on bicyclists and pedestrians, as discussed under TR-2.)

92-8 TR-7H: Construction Impact Mitigation Plan (Alternate Mitigation)

Plan details 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.

4.12 NOISE

Please see separate communications on Noise.

ADDITIONAL COMMENTS ON "TRAFFIC AND CIRCULATION" AND "NOISE"

92-9 In the 1989 General Use Permit EIR, the County acknowledged "existing traffic problems of volume, safety and noise" on the two County roads on campus, Junipero Serra Blvd. (JSB) and Stanford Ave." The mitigation then prescribed, formation of a multi-jurisdictional group to address the problems, has had limited success, most notably recent installation of a "Green Wall"

- sound barrier mitigating noise impacts on homes immediately adjoining the Page Mill/ Junipero Serra intersection.
- 92-10 In 1995, a detailed engineering study of the residential portion of Junipero Serra documented significant safety deficiencies. Attempts to improve safety for all users of the road (bicyclists, pedestrians, and drivers as well as residents on the road) through conventional enforcement have failed repeatedly.
- 92 -11 During the decade, new approaches have emerged. Now that there is significant field experience with traffic calming designs, we are positioned to improve these conditions at last. County Roads recently engaged a consultant who recommended proceeding in that direction, a recommendation previously supported by Stanford's consultant Fehr & Peers.
- 92-12 We ask that this "unfinished business" be carried over as a permit condition in the new environmental analysis, restructured as appropriate to the extensive further growth proposed in this new General Use Permit application, and that funding and an accelerated implementation timetable be specified. County cooperation and support on this initiative is essential since the roads in question are under County Roads' jurisdiction.

Specific goals could be:

- Correct specific safety issues already identified and documented in engineering analyses, and
- Reduce noise to County standards. [See Health & Safety element, SCP-HS 10 and 11, and SCP-HS(i) 19, p. 100-101].
- 92-13 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 DEIR 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.

Please see also separate communications regarding Stanford Avenue safety in the vicinity of the schools, and requesting an update of relevant baseline noise measurements.

4.2 OPEN SPACE, RECREATION AND VISUAL RESOURCES

92-14 OS-3: Will the project adversely affect recreational opportunities for existing or new campus residents and facility users?

The DEIR recognizes that the combination of "housing development [on existing core campus] in recreational areas, ... limiting access to existing informal trails [in the foothills,] and adding to the resident and worker population" will result in Significant Impacts, both by reducing the availability of recreational facilities and increasing the demand for such facilities. (p. 4.2-22) The proposed mitigation (OS-3) includes dedication and improvement of parks and replacement and expansion of recreational opportunities in the foothills.

The Report concludes that the impact after mitigation will be "Less than Significant." That conclusion is open to question for several reasons. For example, there is no timetable for improvement of neighborhood parks, nor for dedication of trails, nor for improvements to trails.

Dedication of Trails. The language of the mitigation regarding trails is in terms of Stanford's working with the County "to clarify the process for developing the agreement" and to "discuss future considerations," and lacks any concrete statements about implementation. The only statement about timing says that dedication of trails "could be phased" as GUP development proceeds.

In addition, and most importantly, this section of the DEIR does not analyze the potential negative secondary effects of the trails mitigation on the community of campus residents. Unless carefully planned and coordinated with other Foothills programs and firmly committed to by advance negotiation, the dedication of new trails, (presumably open to the public and published as part of the County Trail System), has the potential to exacerbate the impacts now being borne by campus residents. Cumulative impacts could take the form of additional public parking and foot traffic impinging on residential neighborhoods, as well as further dilution of the essential character of the resource. The Stanford Planning Office's Foothill Regional Plan (1987, p. 10) stated it well: "Recreational users from the academic community seek the quiet, solitude and the sense of 'getting away from it all'" offered by the foothills.

The brochure "A Conservation and Use Plan for the Dish Area" states that the University "wishes to accommodate recreational use by our friends and neighbors." The foothills are an expansive resource, and it may well be possible to design an overall program that both accommodates neighbors and preserves some of the quiet and solitude sought by the academic community, as well as maintaining the University's conservation and academic uses. However, as the DEIR itself acknowledges (p. 4.2-22) the current Use Plan for the area is "not a part of the CP/GUP project, and is not guaranteed to happen. It is also subject to change."

Table 3-2 (p. 3-6) notes that "...the eventual connection of [newly dedicated and improved] trails to the regional trail network could curtail public uses in other more sensitive areas of the Stanford foothills."

- 92-15 Improvement of Parks. Mitigation OS-3 states "Stanford shall improve parks in the faculty area in such a way as to provide suitable recreational opportunities for the campus population." Additional specificity is required before campus residents can evaluate this proposed mitigation. For example, many questions have been raised about this proposed mitigation, including:
 - What improvements are envisioned for the parks in the faculty area?
 - What types of recreational opportunities are to be provided?
 - Would a community/recreation center for the existing faculty/staff housing area be an improvement envisioned by this mitigation?
 - Where will the improvements be located?
 - Who will determine the specific improvements for the parks?
 - What role will campus homeowners and SCRL have in the planning and design of the improvement projects?
 - Who will pay for the park improvements?
 - While these park improvements would be made to mitigate for the loss of open space, will campus homeowners indirectly pay for these improvements (i.e. through the ground rents they pay to Stanford or through increases in the ground rents charged by Stanford)?
 - Who will pay for the maintenance of the park improvements?

Over the past decade, faculty/staff homeowners have paid for park improvement projects in the residential subdivisions; these projects have been financed out of the ground rent revenues collected by Stanford from campus homeowners. If the park improvements made under Mitigation OS-3 are paid for by campus homeowners (e.g., out of ground rent revenues collected by Stanford or though increases in the ground rent charges), campus homeowners would be paying for a mitigation that was intended to compensate for the loss of open space under the CP/GUP.

Given the complexity of the issues, the number of stakeholders, and the uncertainties of the Use Plan now being initiated, it seems optimistic to rely on OS-3. A more realistic assessment would be that the impact will remain Significant unless a clear and detailed overall plan can be negotiated in advance, including resolution of identified conflicts and a timetable and funding commitment for full implementation.

Finally, it is worth noting that the Use Plan about to be implemented is a reversal of the policy in effect at the time of the last general use permit in 1989. The 1989 final EIR states (Response to Comments 28-1 through 28-3) "Stanford University is implementing the recommendations of the Foothills Region Plan," which clearly called for enforcement of recreational access only by those carrying proof of University affiliation (p. 55). The erosion of this policy over the lifetime of the current GUP underscores the need for much more detail on this matter.

92-16 OS-5: Will the project cause an adverse effect on foreground views from one or more private residences or significantly alter public views?

The analysis indicates that foreground views would be changed for existing residences near three proposed housing development sites in the San Juan district. However, this analysis neglects to address adverse impacts on views from other campus residences (including many of the 13

homes along Junipero Serra Boulevard 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). Under the population increases anticipated in the project and with the removal of informal trails in the foothills under Stanford's Conservation and Use Plan, the backyards and private gardens of existing residences may be directly exposed to additional hundreds of passers-by at close range, as well as to patrol vehicles. No mitigation is identified that can offset this loss of private and quiet enjoyment of family gardens and backyards. Typical measures to screen views could be either ineffectual – because of sloping terrain along this trail segment – or undesirable for many of these homes, because of loss of daylight plane and distant views that are inherent assets of these properties. Please see also the discussion of OS-3 above.

92-17 OS-C3 Will the project combined with other cumulative projects adversely affect recreational opportunities?

The analysis states that cumulative population growth at Stanford will combine with regional population growth to place additional demand on recreational resources, and identifies the impact as Significant. Regarding the conclusion that the impact becomes Less than Significant after mitigation measure OS-3, please see the discussion of OS-3 above.

92-18 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? Please see the discussion under OS-5.

ATTACHMENT 3

POPULATION AND HOUSING

92-19 Section 4.3 Population and Housing: Population of the Stanford Community (Pages 4.3-2 and 4.3-3). There are several potential inaccuracies in the "Population and Housing" section of the DEIR regarding the population size of the Stanford community.

Table 4.3-1 indicates that the population of the "Stanford CDP" has decreased from 18,097 in 1990 to 12,358 in 2000. However, the DEIR may have underestimated the population living in faculty/staff homes. The DEIR uses assumptions based on 1990 Census Bureau Data to calculate a current population of 1,923 for the 989 faculty/staff housing units on campus. Based on a Stanford Campus Residential Leaseholders (SCRL) demographic survey conducted in 1992, and a more recent SCRL Emergency Plan survey of our membership, we estimate that almost 2,600 people live in the 989 faculty/staff homes on campus.

Using 1990 Census information, the DEIR assumes an average household size of 1.95 for the faculty/staff housing population. However, the current average household size may be greater than that figure. Over the past decade, many retired faculty and staff have sold their campus homes to families with children. Also, in addition to homeowners and their children, many other individuals now live in faculty/staff homes: students renting rooms, visiting scholars and their families, personal caretakers, "nannies" and other caregivers, extended family members, and others. Also, during the past few years, the University has asked campus homeowners to help ease the current student housing shortage by renting rooms in their homes to students. For these reasons, the average household size in the faculty/staff housing neighborhoods may have increased over the past decade.

To update SCRL's Emergency/Disaster Plan for campus faculty/staff neighborhoods (which are not part of Stanford University's Emergency Plan), SCRL conducted an Emergency Plan survey of our membership in 1999. Our survey gathered information on the number of residents in faculty/staff homes on campus and on residents who might need special assistance in an emergency. Based on the 556 survey responses, our Emergency Plan survey indicated an average household size of 2.60 for faculty/staff households on campus (2.086 adults per household and .514 children per household). The Emergency Plan survey was not a demographic survey; response rates may have been higher from households needing special assistance during an emergency (which were predominantly households with adults over age 65 and without children). Therefore, our Emergency Plan survey results may understate the current average household size in our community.

In 1992, SCRL conducted a "demographic survey" of our membership. We distributed surveys to the 821 families who were members of SCRL. (In 1992, there were 821 owner-occupied homes in the faculty/staff neighborhoods.) We received 689 responses, an 84% response rate. The survey indicated an average household size of 2.55 in 1992. Due to the changes in our community noted above, the average household size may have increased since 1992. The number of faculty/staff homes has risen since 1992, as well.

Based on 1990 Census information, the DEIR assumes a vacancy rate of 0.3% in faculty/staff housing. However, it is our understanding that there are no vacant faculty/staff homes on campus. All faculty/staff homes on campus are either owner-occupied or rented out.

Furthermore, based on the 1990 Census data, the DEIR assumes that 15% of faculty/staff families on campus have children. Again, SCRL's surveys suggest that this figure is not accurate, and that the percentage of families with children is higher now (29% or more).

With 989 faculty/staff housing units on campus (DEIR, page 4.3-3), and using an average household size of 2.60, we estimate that approximately 2,600 people live in faculty/staff housing units on campus – rather than the 1,923 figure included in the DEIR. Because the purchasers of campus homes over the past year have included families with children, the average faculty/staff household size may have increased further since our 1999 Emergency Plan survey, leading to an even larger faculty/staff household population today.

The faculty/staff household population on campus is an important figure for the DEIR analysis. Given the importance of an accurate campus population figure, perhaps a "census" or demographic survey of the campus community could be conducted to better determine its current size.

The DEIR estimate of the population increase associated with the additional faculty/staff housing units included in the GUP may need revision, also. If an average household size of 2.60 is used for faculty/staff housing, the creation of 668 new faculty/staff housing units would add 1,736 individuals to the campus population, rather than the 935 additional individuals indicated in Table 4.3-13, "Comparison of Additional Housing and Population (Estimated) Included in the GUP." (pg. 4.3-17)

To the extent that other sections of the DEIR rely on potentially incorrect estimates of current and future campus population, other sections of the DEIR may need revisions. Sections which may need correction include: Section 4.2 Open Space; Section 4.3 Population and Housing (including Table 4.3-13); Section 4.4 Traffic and Circulation (including Tables 4.4-18, 4.4-19, and 4.4-20); Section 4.10 Public Services and Utilities – police, fire, solid waste, water, wastewater and school capacity (including pages 4.10-10 to 4.10-13 which use an estimated daily average campus resident population of 12,000 and an estimate of 4,000 additional residents under the GUP); and Section 5.1.B Employment – Housing Balance (including pages 5-2 to 5-3 and Table 5-1).

Date: Mon, 07 Aug 2000 13:38:17 -0700

Subject: DEIR Comments for Stanford CP/GUP

We notice that the Draft Environmental Impact Report for Stanford's General Use Permit application includes an analysis of project impacts on views from private residences (OS-5, page 4.2-24). In addition to the other campus locations discussed, we would like to call your attention to the project's impact on our home. We live at 538 Junipero Serra Boulevard. Our home is one of a group whose back gardens open to a segment of the de facto hiking route on which Stanford is proposing to initiate its new program of public access on September 1.

- The DEIR states that the Community Plan / General Use Permit will "reduce the availability of recreational facilities while increasing the demand for such facilities" (p. 4.2-22) This is likely to 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.
- Thomas Church, the renowned California landscape architect, designed this garden in the 1950's specifically to take advantage of the site, which has broad, open views to the hills on two sides. Since the trail rises steeply to the west immediately behind our home, no fence or hedge could screen the garden and the interiors from the hundreds of daily passersby-- even if the historic integrity of the Church design were to be compromised by such an addition and the view sacrificed. Many of our neighbors have similar situations and would be subject to damage to property value as well as quiet enjoyment of family homes and gardens.
- 93-3 Under the CEQUA evaluation criteria described in Table 4.2-2, the impact is significant as a "Loss or alteration of a specific scenic resource." This short trail segment is not an essential portion of the "Dish" area trail system and does not appear on the County Master Plan. It should be removed from the public route if the final EIR is to retain the conclusion that no mitigation is necessary. We invite you visit the site.

Thank you,

The Robert N. Bush Family

August 7, 2000

Ms. Anne Draper, Planning Director Planning Office County of Santa Clara 70 W. Hedding Street San Jose, CA 95110

Subject:

Comments on the Draft Environmental Impact Report (EIR) for the Stanford University Community Plan and General Use Permit (GUP)

Dear Ms. Draper:

Thank you for the opportunity to review and comment on the Draft EIR for the Stanford University Community Plan/GUP. Overall, the City believes the EIR is a well-prepared, informative document. However, the City hopes that through the inclusion of its comments, the Final EIR will better enable decision-makers to fully understand the scope of the proposal not only for Stanford but also for surrounding communities, like Palo Alto.

In the month of July, the City of Palo Alto held three public meetings regarding the EIR, resulting in the City Council recommendations and comments that are described, by topic, below. In addition to these recommendations, memorandums from the City's Public Works Department and Transportation Division are attached with more detailed comments in their respective areas.

Open Space Preservation

• The EIR and Community Plan/GUP need to analyze mechanisms that will provide permanent, or long-term (25 years or more) dedication of open space for the foothill lands southwest of Junipero Serra Boulevard. The EIR should specifically address what the impacts to open space would be if it is not permanently protected, as well as what the benefits would be if open space is permanently preserved. The EIR acknowledges that the project will result in the loss of recognized open space in this area; however, the EIR does not discuss the inevitable growth that will occur in the foothills as the core campus approaches build-out. Absolute assurance of

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conservation of the foothill open space areas must be linked to the substantial amount of development being proposed.

- As described in the EIR, the proposed Stanford University Community Plan/GUP are inconsistent with the City of Palo Alto's adopted Urban Growth Boundary; the City's Urban Growth Boundary is discussed in Policy L-1 and shown in Map L-2 of the Palo Alto Comprehensive Plan. Additionally, the proposed Community Plan/GUP are inconsistent with existing Santa Clara County General Plan Policies C-GD-19 through C-G-22, which pertain to Urban Growth Boundaries within the County of Santa Clara.
- The proposed land use designation of "Open Space and Academic Reserve" for the majority of the foothill property is further indication that this area is ultimately "reserved" for development, though not necessarily within the timeframe of the proposed GUP. The EIR should identify land to be maintained (as opposed to being held in reserve) as open space and this land should be designated, accordingly, as "Open Space" by the Community Plan. Further, the "Open Space" designation should include a description of allowable uses and intensities of development that would be allowed.
- The EIR should include a discussion of the existing or proposed access to all open space or conservation areas on Stanford lands. Analysis of open space access should focus on how intensification of use could impact open space, and should also address how implementation of the project could lead to further exclusion of public access to areas that have historically been used for open space purposes.
- It is not clear from Figure 2-4, "Existing and Proposed Land Use Designations," of the EIR if the Dish is included within the "Special Conservation" area. The location of the Dish should be shown on this map to clarify its location either within or outside of the area designated for "Special Conservation." Additionally, the City strongly believes that the Dish area should be protected and maintained for open space purposes.
- While much of Stanford's land may not be alienable, mechanisms such as open space easements have been used before by Stanford as a means to achieve long-term open space protection. Accordingly, the EIR should analyze the use of easements as a means to protect existing open space on a long-term basis. Further, the EIR should

describe existing open space protection measures used by Santa Clara County for land within its jurisdiction and by Stanford for other lands under its ownership, such as the Jasper Ridge Biological Preserve in San Mateo County.

• Since the Community Plan is long-term in nature, the EIR should discuss open space protection methods and development ideals that are equally long-term in viewpoint. For instance, the EIR should examine the placement of a "green belt" around the campus that would identify the University's long-term vision of academic build-out.

Project Alternatives

- The EIR should provide and discuss an alternative development plan showing an Academic Growth Boundary (Figure 7-1 of the DEIR) that is coterminous with the City of Palo Alto's urban growth boundary/urban service area. In revising Figure 7-1, Palo Alto's existing urban growth boundary/urban service area should be illustrated on the southern portion of the map (Coyote Hill area) as well as on the northern portion (San Francisquito Creek).
- The EIR should analyze an alternative that would avoid impacts to, and preserve, intact, the Stanford Golf Course. The EIR should also include a discussion of the golf course's value as a cultural resource, recreational open space and habitat for a variety of native fauna and flora. It also seems likely that the housing proposed in the area of Hole #1 could be constructed in a manner that would integrate it into the existing fabric of the golf course rather than supplanting portions of the existing course.
- The EIR states that the Reduced Project Alternative does not avoid the significant impacts of the project, so it is, therefore, not an environmentally superior alternative. The EIR makes this finding even though the Reduced Project Alternative calls for only 50 percent of the total development of the project. This approach treats environmental impacts like an on/off switch—some impact or no impact at all—and ignores differences in degree. Moreover, it seems likely that a 50 percent reduction in development would be environmentally superior given the scale of the project.
- 94-11 The EIR should include a Reduced Project Alternative that reduces the amount of proposed academic development (i.e., 1 million square feet instead of 2 million square feet) but does not reduce the amount of proposed housing. Given the housing

deficit that Stanford presently has, it appears that a significant portion of the proposed 3,000 dwelling units is needed to address the existing shortfall.

94-12 • The EIR should provide an alternative that focuses on reducing the impact of the proposed development, while not necessarily reducing the amount of square footage or number dwelling units being sought. This alternative should discuss the benefits and/or lessened environmental impacts that would occur through the implementation of more compact development patterns (i.e., "clustering") and the intensification of under-utilized (i.e., surface parking lots, single-story buildings) sites in the core campus. Additionally, a discussion of more compact development patterns should include information regarding lessened impacts to the area's transportation system since this development pattern would be more transit-, pedestrian- and bicycle-friendly.

Land Use and Development

- Table 3-3 of the EIR concludes that the Community Plan/GUP are consistent with all City of Palo Alto Comprehensive Plan policies. However, Comprehensive Plan Policy L-1, which is noted in Table 3-3, states, "Continue current City policy limiting future urban development to currently developed lands within the urban service area. The boundary of the urban service area is otherwise known as the urban growth boundary [see comments under "Open Space Preservation"]. Retain undeveloped land [south]west of Foothill Expressway [Junipero Serra Boulevard] as open space, with allowances made for very low-intensity development consistent with the open space character of the area." Given that the EIR and Community Plan/GUP identify up to 20,000 square feet of development outside the City's urban service area, i.e., on the Lathrop property, the conclusion of consistency with the City's Comprehensive Plan is not supported.
- 94-14 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 development for Stanford's lands. The existing setting has become a "moving target" that makes it difficult to fully understand the increment of environmental impact that will result solely from the implementation of the Community Plan/GUP. During the remaining approval process for the

Community Plan/GUP, the City strongly believes that Stanford should cease pursuing separate project approvals.

- 94-15 Related to the preceding point, the Carnegie Foundation proposal, for which a separate draft environmental impact report was recently circulated, should be included as part of the Community Plan/GUP proposal. Or, if not included, the Community Plan/GUP EIR should clearly specify that the 20,000 square feet of development proposed on the Lathrop property, located southwest of Junipero Serra Boulevard, is not describing the Carnegie Foundation project. The City recognizes that the subject EIR includes the Carnegie proposal within its cumulative analysis. However, confusion persists that the 20,000 square feet of development proposed in the Community Plan/GUP for the Lathrop area is in fact describing the Carnegie project, which is nearly identical in area and would be developed on the same parcel.
- 94-16 The EIR should include information and a discussion regarding all of Stanford's extensive land holdings. Even though the EIR is focused on Stanford's unincorporated Santa Clara County land, Stanford's property is contiguous and it is, therefore, vital that it be treated as a single entity. The EIR should, accordingly, provide more detailed information about Stanford's levels of existing and proposed development for all its property, regardless of jurisdiction.
- 94-17 The EIR should include more detailed definitions of the proposed land use designations included in the Community Plan/GUP and indicated in Figures 4.2-4 and 4.2-5. It should be clear what uses and levels of development would be allowed under each land use designation. Also, it is critical that the EIR describe what is meant by the term "Academic Growth Boundary" and by what process such a boundary could be altered in the future. It is the City's view that the Academic Growth Boundary should define the area in which urban levels of development could occur, and that such a boundary should not merely be a "line on a map," that is easily changed to accommodate future development. The City further believes that the Academic Growth Boundary should be kept in place, coterminous with the City's urban growth boundary, for the maximum period of time permitted by County regulations.
- 94-18 The Development districts identified in the EIR (Figure 2-6, Tables 2-1 and 2-2) 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.

Language in the Plan/GUP itself indicates otherwise. This inconsistency should be clarified.

Housing and Community Facilities

- 94-19 The City supports Stanford's intention to add over 3,000 housing units to the campus through the GUP, but disagrees with the conclusion reached in the EIR, that the project will not have a significant impact on existing residential neighborhoods in the City of Palo Alto. The subject EIR is a program-level document and does not contain a factual basis for reaching this conclusion. Moreover, should future project-specific environmental documents find that significant impacts to existing Palo Alto neighborhoods will occur, a supplemental EIR would need to be prepared providing a revised analysis.
- 94 -20 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.
- The EIR should further discuss the "standard employment multiplier," referred to on pages 5.4 and 5.5, and how it is used to determine the overall growth-induced impact of the Community Plan/GUP.
- 94 -22 Given the shortage of housing and the acute shortage of affordable housing identified in the EIR, it is likely that the 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 Stanford-Palo Alto-Menlo Park area. Also, the EIR estimates that development under the proposed GUP would generate approximately 1,000 new jobs, and possibly as many as 1,500 to 2,000, if the "standard employment multiplier" is used. The City believes the EIR should identify additional housing sites on and off campus, in order to meet regional housing needs or identify other means to address this issue, including payment of fees to adjacent jurisdictions that may be impacted by Stanford's proposed development.
- 94 -23 The EIR should discuss the lessened environmental impacts or potential benefit that would result through assurances of affordable housing being provided either oncampus or in the immediate vicinity of the campus. These lessened impacts would include reduced vehicle trips to/from the campus from outside areas.

- 94-24 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.
- 94 -25 The EIR does not discuss the extent to which Stanford residents, faculty and students use community facilities, such as libraries and parks, located in neighboring cities. The City of Palo Alto conservatively estimates that Stanford residents account for approximately 5 percent of the total usage of City facilities. Given the age of the City's infrastructure, the increased usage described in the Community Plan/GUP EIR means an accelerated deterioration of their physical condition, which is not discussed in the EIR. Moreover, should the EIR find a significant unmitigated impact to Palo Alto community facilities, a Statement of Overriding Considerations should be adopted by the County Board of Supervisors. The City of Palo Alto expects that the County of Santa Clara shall require Stanford to pay City impact fees toward these facilities.

Schools

- 94 -26 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 law. However, the City wants to emphasize that these measures will not address the actual impacts to schools within the Palo Alto Unified School District (PAUSD). Since 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 Considerations by the County Board of Supervisors.
- 94-27 The EIR should provide information regarding Stanford's existing impacts to the PAUSD school system. At a minimum, 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.
- 94-28 Potential additional options are outlined on pages 4.10-8 and 4.10-9 of the EIR and include the possibilities of constructing a third middle school on Stanford land, reopening closed schools, or modifying existing schools. The City of Palo Alto strongly

believes Stanford must be involved in the discussion and eventual implementation of additional options for addressing school impacts.

- 94-29 The EIR should provide a more viable alternative school site—one more proximately located to existing Palo Alto neighborhoods—than the one shown in Figure 7-6. The EIR also needs to address the impacts of the alternatives described on pages 4-10-8 and 4-10-9 that would lead to reclaiming school sites and displacing existing City community centers. The recommendation from Stanford that PAUSD could use property now devoted to Terman and Cubberley Community Centers would potentially reduce the amount of land devoted to City community centers, services and facilities. The City believes this reduction in land devoted to community facilities constitutes a direct environmental impact that should be addressed in the EIR. Moreover, the potential loss of community facilities is inconsistent with several Palo Alto Comprehensive Plan policies and goals described in its "Community Services and Facilities" element, particularly Policy C-29: "Strategically locate public facilities...to serve all neighborhoods in the City."
- 94-30 Related to the preceding recommendation, if a viable school site within the City of Palo Alto's urban service area/urban growth boundary is not included in the EIR, and the City must surrender existing community center facilities for the purpose of a new school in order to accommodate Stanford growth, Stanford must pay their fair share of acquisition costs to mitigate the direct impact of their growth on Palo Alto community centers. Stanford's contribution should close the gap between the fair market value of a new community center site and the unmet cost after City and School contributions have been made.
- 94-31 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 impacts from the recommended PAUSD/Stanford conversion of community facilities to schools are in addition, and therefore cumulative, to the impacts created from Stanford's proposed growth, the City's proposed growth, and overall demographic turnover. Previously-prepared EIRs for the City's Comprehensive Plan and the Sand Hill Road projects used lower demographic projections and growth assumptions than what actually occurred. In light of this, the EIR needs to provide up-to-date, realistic information that better reflects the level of population growth that is anticipated.

Circulation and Parking

- 94-32 The EIR identifies various transportation measures to mitigate traffic impacts. These measures need to be placed into a more comprehensive context. Therefore, Stanford should prepare an integrated transportation plan (see attached memorandum from the City's Transportation Division for more detailed EIR and project recommendations) 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 sub-area 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.
- 94-33 The EIR should provide an analysis of the potential traffic impacts to existing Palo Alto neighborhoods. For instance, the EIR identifies over 1,000 new dwelling units proposed adjacent to 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.
- 94-34 The City believes it is imperative that proposed GUP maintain the "no new net commute trips" standard included in the 1989 GUP. Additionally, the 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.
- 94-35 In conjunction with comments made above under "Land Use and Development," 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.
- 94 -36 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 proposed under the GUP/Community Plan.

- 94-37 The EIR list of traffic mitigation measures includes evaluation of several intersection widenings. 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 secondary effects.
- 94-38 With respect to pedestrian travel, all intersection widenings, including those discussed in the EIR, 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.
- 94-39 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.
- 94-40 Roundabouts have had an impressive safety record worldwide. As traffic-calming measures, roundabouts can help slow vehicle speeds and create safer travel conditions for pedestrians and bicyclists. Roundabouts should, therefore, be considered in the EIR as an alternative to such conventional intersection treatments as signalization, new signal phases and intersection widening.
- 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.
- Trip generation rates are a critical element of the EIR transportation analysis. 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 (TDM). 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.

- As previously stated, the City staff 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 impacts. For all Tier 2 projects, conceptual-level cost estimates should be provided, as well as Stanford's fair share contribution.
- As described in the EIR, 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.
- City staff supports traffic-calming mitigation measures. However, the EIR should be more specific regarding Stanford's responsibility to determine the amount of cutthrough 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.

Storm Water Run-Off/Flooding

- The EIR analyzes run-off impacts based upon a 100-year, 24-hour storm event instead of the typically used 10-year, 6-hour event. The EIR should be revised to include an analysis of the 10-year, 6-hour standard, since mitigation measures designed for the 100-year event would not necessarily mean that increased run-off would not occur during smaller storm events.
- The EIR cites the use of detention basins as the sole mitigation measure for anticipated increases in run-off resulting from new development on the campus. While detention basins are an acceptable means of controlling peak run-off, they should not be used to the exclusion of alternative features. Therefore, the EIR should be revised to include an analysis of more innovative measures (e.g., vegetative swales, pervious pavement, reduced building footprints).
- 94 -48 The EIR should include an expanded discussion of water quality impacts. For instance, copper is a significant contributor to water quality impacts and much of this

> is a result of copper's use in brake pads and building materials (i.e., roofing). Since the project would involve both increased vehicle trips (more brake pad wear) and new building construction, the EIR should address the potential water quality impacts that could occur.

Biological Resources

- Option 2 regarding the California Tiger Salamander should be incorporated into the project since it is superior from an environmental standpoint in that it avoids a significant impact to the species and its habitat. Moreover, the EIR should examine a "no-build" option on the Lathrop property that could potentially reduce impacts to the California Tiger Salamander to an even greater extent.
- 94-50 The EIR should provide an analysis of the habitat value of the Stanford Golf Course. Among other things, this analysis should examine impacts to the Western Bluebird and other species should the golf course, or portions thereof, be lost to development.

Implementation and Monitoring

- The EIR includes information on the phasing of development (i.e., proportion of residential development that needs to occur in relation to academic development), but is silent on how monitoring of development will occur and by whom it will be done.
- The existing 1989 GUP includes a provision that annual development reports should be prepared documenting the development that has occurred during the year. The City supports a continuation of the reporting process under the proposed GUP and believes that the EIR should indicate whether the annual reporting process would continue under the proposed GUP.
- 94-53 The EIR identifies construction noise impacts as significant and not able to be mitigated to a less than significant level, even though construction would be done in accordance with Santa Clara County noise regulations. The EIR should analyze construction standards that take into account the nature of adjacent development or habitat that is more sensitive to construction noise. The standards would provide greater protection for sensitive receptors, such as existing residential areas. For instance, the EIR indicates that construction could occur from 7:00 am to 7:00 pm, Monday through Saturday. Reduction in construction hours and elimination of

Saturday construction may eliminate or lessen significant construction noise impacts on adjacent residential areas.

• Given the considerable scale and complex staging of the GUP/Community Plan, the EIR should discuss the resources (i.e., staffing) Santa Clara County would have in place to adequately monitor and enforce the all of the proposed development.

Thank you again for providing us with the opportunity to comment on this EIR and we look forward to working with you on the finalization of this document in the coming months.

Sincerely,

LIZ KXISS

Mayor

Attachments:

Public Works memorandum, dated July 24, 2000

Transportation Division memorandum, dated July 24, 2000



Public Works Department Engineering Division

MEMORANDUM

Date:

July 24, 2000

To:

Luke Connolly, Planning

From:

Joe Teresi (x2129) Joe Juan Senior Engineer

Subject:

EIR for Stanford University Draft Community Plan

and General Use Permit Application

The Public Works Engineering Division has the following comments on the subject EIR:

- 1. Arastradero Creek is a tributary of Matadero Creek (confluence is near intersection of 94 -55 Arastradero and Page Mill Roads). It is not clear why Arastradero Creek watershed is separated out from Matadero Creek in the analyses and tables. Data pertaining to Deer Creek, another tributary of Matadero Creek, is included with the Matadero Creek data.
- 94 56 2. The 100-year rainfall total and average intensity appear to be underestimated in the hydrology section (Page 4.5-9). Using the Santa Clara County Drainage Manual as a reference, the mean annual precipitation for Stanford University is 16 inches, and the runoff for a 100-year, 24-hour storm is 4.68 inches (not 4.32 inches), with an average intensity of 0.19 inches/hour (not 0.17 inches/hour).
- 3. It is unusual that the analysis of the impacts of increased runoff resulting from the 94 -57 proposed new development is based upon a 100-year, 24-hour storm. The 100-year standard is normally used to analyze the capacity of regional facilities such as creeks or large flood control facilities. A portion of the developed campus area drains into the city of Palo Alto's storm drain system. Storm drain systems are typically designed to convey the runoff from shorter, more frequent storm events, such as a 10-year, six-hour storm. Impacts of the proposed development on the 10-year storm peak runoff rate are not addressed in the EIR. Increases in the 10-year storm peak runoff will have adverse impacts on the City's storm drain system. The fact that project mitigations will ensure that there will be no increase in the peak runoff from a 100-year storm does not necessarily mean that there will not be an increase in peak runoff during smaller events. Since the design details of the proposed detention basins are not discussed, it is not clear what, if any, runoff detention will take place during smaller storms.

The EIR should be amended to include an analysis of the impacts of the proposed development on the peak runoff rate from the 10-year, six-hour storm event.

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94-58 4. Runoff from portions of the developed campus area flows through the City of Palo Alto enroute to Matadero Creek, either through the City's storm drain system or through the Stanford Channel, a Santa Clara Valley Water District facility. The Stanford Channel has less than 100-year flood control capacity. It overflows into a natural drainage course and storm drain system that traverses the College Terrace neighborhood in Palo Alto when it fills beyond its capacity. This overflow has caused flooding in the neighborhood during moderate storms (less than 100-year storms) in the past. Any additional runoff may exacerbate this flooding threat. Portions of the campus drain into a Caltrans/City storm drain that runs south along El Camino Real, east on Page Mill Road, and south along Park Boulevard before discharging to Matadero Creek. Additional runoff may result in flooding of this storm drain system. The EIR does not address the impacts of the proposed development on either of these drainage facilities.

The EIR should be amended to include an analysis of the impacts of the proposed development on the City of Palo Alto's storm drain system and the Stanford Channel. As discussed under item 3 above, these impacts may occur during storms smaller than the 100-year, 24-hour storm analyzed in the EIR.

94-59 5. Runoff from portions of the developed campus area flow to San Francisquito Creek. The creek has less than 100-year flood control capacity. The EIR does not analyze the impacts of increased runoff from new development on San Francisquito Creek during storms smaller than the 100-year storm event. The fact that project mitigations will ensure that there will be no increase in the peak runoff from a 100-year storm does not necessarily mean that there will not be an increase in peak runoff during smaller events.

The EIR should be amended to include an analysis of the impacts of the new development on the potential for San Francisquito Creek flooding during events smaller than the 100-year storm.

- 94-60 6. The EIR cites the use of detention basins as the sole proposed mitigation for expected increases in runoff resulting from new development on the campus. While detention basins are an acceptable means of controlling peak runoff, there are other drainage features that can be incorporated into site designs that will reduce total runoff and improve storm water quality, as well as control peak runoff rates. These features will also function to reduce runoff during smaller, more frequent storms, when the proposed detention basins may not be effective. These design features include the following:
 - Directing roof and parking lot drainage into vegetated swales
 - Elimination of "directly connected impervious areas" by breaking up drainage paths with landscaping or other pervious areas
 - Retention of native vegetation and minimization of disturbances to natural terrain
 - Use of pervious pavement materials
 - Use of underground parking and multi-storied buildings to minimize development footprints
 - Clustering of development to minimize land disturbances

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These and other design techniques are described more fully in a manual entitled Start at the Source Design Guidance Manual for Storm Water Quality Protection, published by the Bay Area Storm Water Management Agencies Association.

The EIR should be amended to require drainage design features in addition to retention basins as mitigation measures that will control the quantity of storm water runoff.

7. The EIR sections on groundwater and surface water quality impacts discusses the preparation of Storm Water Pollution Prevention Plans (SWPPP) and the use of Best Management Practices as a mitigation measure only in the context of compliance with the State of California General Permit for Discharges of Storm Water Associated with Construction Activities. The EIR correctly states that the General Permit applies only to projects that disturb five or more acres of land. Water quality impacts, both short-term impacts during construction and permanent post-construction impacts, may, however, result from projects of any size. In addition, the Municipal Stormwater Permit issued to Santa Clara County (as one of 15 co-permittees in the County) requires the County to "implement control measures and best management practices to reduce pollutants in storm water discharges to the maximum extent practicable" through development and implementation of an Urban Runoff Management Plan (URMP). One of the required components of the URMP is a plan to review and control the water quality impacts of new development.

The EIR discussion and mitigation measures should be clarified to require Stanford to prepare a SWPPP and implement BMP's on all new development projects, regardless of size.

94-62 8. The EIR's discussion of potential water quality impacts and mitigation measures is rather limited and should be expanded to address the full range of issues. There should be more discussion of typical Best Management Practices (BMP's) that will be incorporated into the proposed development to minimize both construction and post-construction storm water quality impacts.

Potential construction-related water quality impacts include erosion of sediment as well as non-storm water discharges resulting from improper material storage, site housekeeping practices, and construction vehicle/equipment maintenance, fueling and cleaning. Certain construction operations (e.g. paving, concrete truck washout, pavement sawcutting, painting) also have a high potential to release pollutants if not performed properly. Typical construction-stage BMP's include stabilized construction entrances, catch basin protection, silt fencing, berming around material and equipment storage areas, and designated concrete washout areas.

Potential permanent water quality impacts include increased runoff, and the introduction of pollutants including sediments, heavy metals, pesticides, fertilizers, and other chemicals from sources such as parking lots and dumpster areas and activities such as landscape maintenance, car washing, and tenant use and disposal of cleaning products and other household chemicals. Typical permanent BMP's that should be considered include site planning concepts such as reduced impervious area, clustering of buildings, infiltration of

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storm runoff, and retention of native vegetation. Specific BMP's may include catch basin stenciling (No Dumping! Flows to San Francisquito Creek), routing of parking lot and building storm runoff to vegetated swales, storm water pollution prevention education for eventual building user/residents, and the use of catch basin filter inserts, covered dumpster areas, and pervious paving. Start at the Source, described in comment 6 above, is an excellent guidance document for selecting permanent storm water pollution prevention BMP's.

cc: Glenn Roberts Kent Steffens Jim Harrington



TRANSPORTATION DIVISION

Memorandum

Date:

July 24, 2000

To:

Luke Connolly

From:

Carl Stoffel 65

Subject:

GUP Mitigations

The City supports the following transportation mitigations for the GUP:

- 94-63 1. "No net new commute trips" (DEIR Mitigation TR-5B) and "Cooperative trip reduction" (Mitigation TR-5C) should be the primary mitigation measures for intersection impacts on major roads.
- 2. Tier 1 intersection improvements (Mitigation TR-5A) should be implemented. These are Arboretum/Palm and Welch/Campus Drive West, both of which are Stanford campus intersections (Arboretum/Palm signal is operated and maintained by Palo Alto). For each location, we support giving Stanford the option of implementing a configuration other than that specified in the DEIR if the alternate improvement is equal or better. Specifically, we support the option of a modern roundabout at Arboretum/Palm, if so desired by Stanford.
- 94-65 3. 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, with the proviso that Palo Alto may wish to use the funds on an alternative project (refer to discussion below).
 - b. We do not support other Tier 2 intersection projects in Palo Alto or Santa Clara County for reasons stated elsewhere.
 - 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 Stanford campus.
- 94-66 4. Palo Alto supports Stanford participation in future neighborhood traffic studies initiated by Palo Alto and Menlo Park (Mitigation T-6A). Palo Alto suggests that this mitigation measure 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.
- 94-67 5. 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 (i.e., 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 requirement 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 County Tier 2 intersections for which fair share funds are received per item (b) above, Palo Alto has identified the following possible "alternative mitigations" 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.

- (i) Increased shuttle service in the Stanford Research Park (all-day bidirectional service between all major Research Park locations and the California Avenue Caltrain station).
- (ii) Establishment of a transit center for Stanford and Palo Alto at the University Avenue Caltrain station.
- (iii) Bicycle lane projects on Junipero Serra Boulevard between Foothill Expressway and Alpine Road and on Deer Creek Road between Arastradero Road and Page Mill Expressway.
- (iv) Sidewalk and/or multiuse path along the north side of Stanford Avenue between El Camino Real and Escondido Road.
- (v) Planned new pedestrian/bicycle undercrossing of Alma and Caltrain tracks at California Avenue. This undercrossing would be part of the proposed Stanford/Palo Alto Bay to Foothills trail in which Stanford may participate as part of the GUP.
- (vi) Planned new pedestrian/bicycle undercrossing of the Caltrain tracks at Homer Avenue. This undercrossing would link pedestrian and bicycle traffic to the Stanford campus via the existing PAM/ECR traffic signal and a potential new pedestrian/bicycle path through the Stanford arboretum area to connect to the Medical Center area (see next item).
- (vii) Construction of a pedestrian/bicycle path in the Stanford arboretum area between the PAMF/ECR traffic signal and the Arboretum/Palm intersection.
- (viii) Construction of a pedestrian/bicycle path between the new Cancer Center and the new signalized intersection on Sand Hill Road leading to the Stanford West apartments and the bike bridge over San Francisquito Creek. This would include a crossing of Welch Road, which might be signalized.
- (ix) Expansion of the Palo Alto/Stanford shuttle integration project hours of operation.

GUP Mitigations July 24, 2000 Page 4 of 6

(x) Increased Stanford responsibility for traffic calming projects in Palo Alto (beyond mitigation measure TR-6A), to include collector streets and residential arterials.

Note: Some of the above alternative mitigations were also listed for the recently-approved Cancer Center project.

94-68 6. The impact of the GUP extends beyond the peak hour impacts specifically identified in the DEIR. 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" as described in the attachment to this memorandum.

CS

Attachment: "An Integrated Transportation Plan for Stanford"

GUP Mitigations July 24, 2000 Page 5 of 6

ATTACHMENT

An Integrated Transportation Plan for Stanford

Stanford lands are served by a complex, multimodal transportation system. Elements of this system are the campus road net, Marguerite shuttle bus routes, bike lanes and paths, sidewalks, and a travel demand management program. Stanford's transportation system interconnects with the roadway, bus and rail transit, bicycle, and pedestrian networks of the surrounding region. Both Stanford's and the region's transportation needs and possibilities are dynamic. Prospective changes in the region's transportation system over the next five to ten years include:

- Doubling of Caltrain service
- Deployment of "articulated" (double capacity) VTA buses to and from the University Avenue Caltrain station
- Creation of a high-speed "baby bullet" passenger train between San Francisco and San Jose
- Development of a Palo Alto Intermodal Transit Center
- Construction of a new bicycle/pedestrian undercrossing of Caltrain near Stanford lands at Homer Avenue in Palo Alto
- Creation of an east-west "bicycle boulevard" in Palo Alto
- Construction of a continuous off-road bicycle path between Churchill and the University Avenue depot in Palo Alto
- Improvements to Palo Alto's Shuttle and other local transit service
- Arterial and local street traffic calming initiatives in Palo Alto
- Major upgrades to Palo Alto's traffic signal system
- Successful, citywide travel demand management efforts in Palo Alto

Potential transportation system changes in the ten- to twenty-year horizon include:

- Inauguration of high-speed rail passenger service between Los Angeles and San Francisco
- Creation of commuter rail service parallel to the Dumbarton bridge, with shuttle service from an East Palo Alto station to Palo Alto and Stanford
- Extension of light rail service from Mountain View to Palo Alto
- Continued improvements in bus transit services, bicycle, and pedestrian facilities in the region

These shorter- and longer-term changes will take place in context of and in response to rising travel demand, increased levels of roadway congestion, and heightened concerns about air pollution and quality of life for the region.

An integrated transportation systems or master plan needs to be developed in order for Stanford to respond effectively to these concerns and the opportunities. This plan should be integrated in two ways: 1.) developed in cooperation with neighboring jurisdictions: Palo Alto, Menlo Park, East Palo Alto, and the County of Santa Clara; and 2.) provide for efficient integration and optimal use of the various transportation modes, including private vehicles, bus and rail public transport, bicycle and pedestrian transportation. The integrated transportation plan should have

GUP Mitigations July 24, 2000 Page 6 of 6

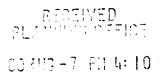
shorter-term (perhaps one to ten year) and a longer-term (perhaps ten to twenty year) components. In addition to addressing each transportation mode, the Plan should include several ancillary facilities or functions. Plan elements should comprise the following:

- Vehicle Circulation and Roadway Network
- Public Transit
- Bicycle and Pedestrian
- Parking
- Travel Demand Management
- Transportation System Management (including use of Intelligent Transportation System technologies in place of conventional increases in road capacity)
- Traffic Calming (including use of innovations such as roundabouts in place of conventional traffic signals or stop control) elements.

County of Santa Clara

Environmental Resources Agency Parks and Recreation Department

298 Garden Hill Drive Los Gatos, California 95032-7669 (408) 358-3741 FAX 358-3245 Reservations (408) 358-3751 TDD (408) 356-7146





MEMORANDUM

TO:

Sarah Jones, Project Planner, County Planning Office

FROM:

Jane Mark, Park Planner, Planning and Development \mathscr{M}

CC:

Lisa Killough, Deputy Director, Administration; Mark Frederick, Manager, Planning and Development; Kathryn Berry, County Counsel; Lizanne Reynolds, County Counsel; Parks and Recreation Commission

SUBJECT:

Comments on Draft EIR for the Stanford Community Plan/General Use

Permit

DATE:

August 7, 2000

Thank you for the opportunity to respond to the subject Draft Environmental Impact Report (DEIR) for the *Stanford Community Plan/General Use Permit (CP/GUP)*. Overall, the Santa Clara County Parks and Recreation Department agrees with the DEIR's conclusion that the Stanford development project will increase demand for recreational resources in the project vicinity. Given proposals for over 3,000 new housing units and over 2 million square feet of academic and related facilities, the Stanford CP/GUP project presents a critical need for the provision of additional recreational amenities and services to the campus residents and users.

The Parks Department considers the proposed trail easement dedications for Matadero Creek/Page Mill Trail (Sub-Regional Trail Route S1) and the San Francisquito/Los Trancos Creeks Trail (Connector Trail Route C1) appropriate mitigation measures for the population impacts. We believe that the trail dedications would be reasonably proportionate to the magnitude and scale of this project, particularly with the additional 10,435 total estimated student and family population. Furthermore, the trail routes will provide a unique opportunity for Stanford to provide vital circulation links and alternative transportation modes for all campus users, including students and faculty, residents, commercial users, and employees, as mitigation measures to meet the "no net commute trips" requirement of the development impacts.

95-1 At this time, we have specific comments regarding Mitigation Measure OS-3 (Improvement of Parks and Dedication of Trails) in the Open Space, Recreation, and Visual Resources section of the DEIR. Based on further review of the Stanford CP/GUP DEIR and discussions with the staff of Stanford University Planning Office and County Planning Office, the Parks Department determined that improvements to trails, as noted on page 4.2-22 of the DEIR, require greater clarification. We would like the DEIR to focus on more specific aspects of the "trigger mechanisms" that actually initiate the implementation of the trail easement dedication in the Stanford development process.



Furthermore, we would like aspects of trail construction, maintenance, and operations further clarified in the mitigation measure set forth.

Phased Implementation of Trail Easement Dedication

The Parks Department would like the DEIR to address the timing of the following implementation measures in the trail easement dedication and future Agreements for Trail Easement for Matadero Creek/Page Mill Trail (Route S1), and San Francisquito/Los Trancos Creeks Trail (Route C1).

- Since Stanford intends to grant trail easement dedications for the proposed trail
 alignments through the subject property with the present General Use Permit (GUP)
 application, the DEIR should include a recommendation for a designated time
 period, particularly when Stanford intends to execute the Agreements for Trail
 Easement, and a time for completion of the trail construction.
 - Specifically, the County Planning Office should require the applicant to complete
 construction of a specified length of trail easement within one year of issuance of the
 GUP, as a final condition of approval. In addition, the construction of the remaining
 amount of trail easement should be completed when approximately 50% of the
 proposed GUP plan is developed.

Development and Management of Dedicated Trails on Stanford Lands

Given the scale of the development project and increased population of campus residents and users, the Parks Department would like to assure the actual development and proper management of the designated trails on Stanford lands. To also ensure that trails be built for the appropriate access and safety of the public trail users, the Parks Department requires the trails to be constructed to comply with trail standards and design guidelines set forth in the Santa Clara County Countywide Trails Master Plan, adopted by the County Board of Supervisors in 1995, and later refined in the Uniform Interjurisdictional Trail Design, Use, and Management Guidelines in 1999.

The Parks Department has determined that it would be more advantageous for Stanford to assume the responsibilities of maintaining and patrolling the trails once they are completed and open for public access, for the following reasons:

- The Parks Department will only build trail segments through private lands when they
 can provide appropriate public access to the trail through public facilities such as a
 public park or road. Since we do not own any County parkland or facilities located
 in the immediate vicinity of the designated trail easements, we believe that Stanford
 should be responsible for the construction and management of trails located within
 their lands.
- Since Stanford already invests in maintenance and operation programs for their
 existing hiking and bicycle trails within the campus, they would be incurring a nominal
 cost, compared to the additional costs incurred by the Parks Department, to
 maintain and patrol the additional segments of trails, once constructed, on their
 land. In addition, Stanford would have greater control over the trails to maximize
 ease of management. Patrol of the trails may be performed by any combination of
 Stanford staff, trained volunteers, City of Palo Alto Police Department, or the County
 Sheriff, depending on the joint arrangements.

- Should Stanford assume full responsibility over the trails. Stanford should develop a
 trail management plan that will include a patrol and maintenance program and
 performance standards to monitor the condition of the trails before opening any new
 section of trail.
- At the time of implementation, the Parks Department could assist Stanford in ensuring that trails be built in conformance with the trail standards and design guidelines set forth in the Santa Clara County Countywide Trails Master Plan (1995) and Uniform Interjurisdictional Trail Design, Use, and Management Guidelines (1999).
- Liability issues will need to be addressed regarding indemnification of trail users.

The Parks Department looks forward to working with the County Planning Office and the applicant to implement the trail easements. Please do not hesitate to call if you have further questions regarding our comments. You can contact either me at (408) 358-3741, extension 152, or via EMAIL at jane.mark@mail.prk.co.santa-clara.ca.us.

CF Y COUNCIL: TEL 650.858.3380 FAX 650.328.7935

MARY JO SORAK MAYOR

NICHOLAS JELLINS MAYOR PRO TEM

PAUL COLLACCHI COUNCILMEMBER

CHUCK KINNEY COUNCILMEMBER

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701 LAUREL STREET, MENLO PARK, CA 94025-3483 www.ci.menlo-park.ca.us

August 7, 2000

Sarah Jones
County of Santa Clara Planning Office
Development Review Section
County Government Center
70 West Hedding Street
San Jose, CA 95110

RE: Draft Environmental Impact Report Prepared for the Proposed Stanford Community
Plan and General Use Permit

Thank you for providing the City of Menlo Park with the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Stanford Community Plan and General Use Permit (CP/GUP). The City of Menlo Park held a public meeting with the City Council on July 25, 2000, in order to allow the public as well as the Council to comment on the DEIR. The comments received during the public meeting are being forwarded to the County of Santa Clara for inclusion in the comments and responses to the comments that will be prepared as part of the Final EIR for the proposal.

The City Council would first like to acknowledge and thank the County for including a number of elements requested by the City in the DEIR. These include the analysis of an alternative roadway connecting Campus Drive West and Alpine Road, analysis of the complex intersection of Sand Hill/Santa Cruz/Alma/Junipero Serra as a single intersection, identification of traffic generation of GUP uses according to a mapped zone system, and attempting to adjust the traffic model to overcome certain artificial rigidities that cause some previous models to under-predict movements crossing county lines when large projects are located near county boundaries.

Because the proposed CP/GUP is the "project" for which the DEIR has been prepared, our letter includes comments on both the CP/GUP and the DEIR. Although the City recognizes that CEQA only mandates a response to those comments directly on the DEIR, the City would request that the comments on the Community Plan and General Use Permit be given equal and serious consideration and that appropriate responses be provided. Listed below are the City of Menlo Park's comments on both documents.

TOTAL CALLS

Comments on the Community Plan and General Use Permit

Land Use

- 96-1 1. The development levels projected in the CP/GUP appear to be based solely on Stanford's projections of its needs, emphasizing Stanford's private institutional goals over the public welfare. As a result, it does not seem that anyone has asked the larger question of whether the entirety of the proposal, including the two million square feet of commercial development and approximately two million square feet of residential development, is sustainable in the region, especially given the growth in the surrounding communities. Unfortunately, the many individual elements of the CP can overwhelm the discussion of whether or not the proposal provides for a sustainable level of growth. The City Council requests that Santa Clara County assess the CP/GUP in terms of sustainability in the broader community and re-emphasize the County's responsibility to the public welfare, eliminating wording that binds the County to Stanford's private institutional goals.
- 96-2 2. Continued Stanford growth in the urban core is a matter of County discretion. The Menlo Park City Council can support reasonable levels of continued growth in the urban core with the explicit understanding that Stanford will provide some amount of true public benefit in exchange for density increases. It is important to clearly delineate what public benefits are being provided.
- 96-3 3. It is important to understand that Stanford is a community asset, but that much of the development on the campus results in additional burdens on Menlo Park. The CP/GUP should focus on and include approaches that will balance these interests.
- 96 -4 4. Although the CP includes references to regional land use planning efforts, these are general statements and do not include specific provisions for continuing public input over the life of the Community Plan. The CP should include specific provisions for continuing public input over the life cycle of the CP, including the identification of stakeholders and their role in the continuing review and mitigation monitoring process.
- 96-5 5. The CP should have a total and permanent limitation, or cap, on building square footage and population with the understanding that it does not give Stanford the right to extend the limits beyond the cap.
- 96-6 The CP/GUP should include specific restraints in order to deal effectively with expected growth pressures. The intent of the proposed AGB is anticipated to provide such a restraint. However, the CP allows for review and adjustment of the AGB after five and ten years to maintain an adequate supply of land for development purposes. The AGB will not effectively deal with growth pressures.
- 96-7
 7. The documents contain a lack of specificity or appropriate detail on which to base a meaningful review or environmental analysis of the proposal. The Menlo Park City Council believes that the CP/GUP should contain a level of detail and specificity that is consistent with the application of zoning to the campus. Traditional zoning has at least three elements, including a defined area, permitted and conditional uses and development regulations. The CP/GUP should contain a refined grid of areas, identification of specific permitted and conditional uses for each area, and specific

- development standards for each area, including Floor Area Ratios (FAR) expressed in numbers or percentages. A description of the necessary infrastructure should also be included.
- *96-8 8. The CP should incorporate a comprehensive reporting structure that discloses planning aggregates, jobs, housing units, population, parking, etc., for all Stanford lands, not just the campus portion under the County's jurisdiction.
- 96-9 9. The CP should include 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.
- 96-10 10. The CP should be modified to support integration and consistency with the Palo Alto Comprehensive Plan.
- 96-11 11. Although the DEIR indicates that Stanford would be responsible for its fair share of costs for mitigation of impacts related to the proposed development, the CP should also establish that Stanford is responsible for all fees and costs associated with future development on its lands.

Open Space

- 96-12 12. The Menlo Park City Council recognizes that the proposed AGB will not provide for the permanent or long-term preservation of the open space area located in the foothills. Stanford's open space is a vital part of the mid-peninsula area. The CP/GUP should contain a specific and defined commitment to permanent open space. The City Council favors a more rigorous implementation of open space than promises of short-term restraint in the foothills. Stanford should be made to transfer some of its development rights in the foothills for increased development rights in the urban core. This type of an exchange or transfer of development rights should persist as long as the development persists.
- 96-13 13. The land west of Junipero Serra Boulevard should be preserved as it currently exists, with no allowances for the development of office within the area.
- 96-14 14. The CP should specify the location and extent of open space and natural resources and include provisions for dedicated open space and the long-term protection of natural resources. In particular, both the County and the CP should distinguish between as yet undeveloped land and dedicated public open space. To help make the distinction, "open space" has no present or future development entitlements.

Housing

96-15 15. Although the DEIR includes an analysis of housing needs, the CP does not include an equivalent assessment. The CP should identify short-term and long-term housing needs associated with its faculty, staff, employees, and students and mechanisms for addressing those needs.

Circulation

96-16 16. The City of Menlo Park recognizes that the DEIR includes a monitoring program within Mitigation TR-B5 for traffic generation. However, as described in Comment #31 under the discussion of the

DEIR, the monitoring program includes several loopholes and would be applicable only to traffic generation for the GUP area and not all Stanford lands. This is a significant shortcoming of the proposed traffic monitoring system. In addition, the traffic monitoring program is the only type of performance standards included in the documents. The Menlo Park City Council requests that the CP/GUP include visionary performance standards for minimizing potential impacts to surrounding jurisdictions, property owners, and residents. The performance standards should include independent monitoring for traffic and other variables.

- 96-17 17. The CP/GUP provides parking at estimated unconstrained demand rates (see DEIR Comment #27). Even the parking mitigation proposal identified in the DEIR continues to provide parking at the existing ratio of stalls to campus population. Mitigation Measure TR 5-B identifies the possibility of, but does not necessarily recommend, providing new parking only at the existing ratio 1.03 stalls per student, faculty and staff. This would limit added parking to 2,267 stalls as compared to 2,873 proposed (or ,2325 without the Performing Arts Center). The CP/GUP should consider the potential that an increase in parking encourages people to drive to Stanford. The documents should consider methods to increase the difficulty of parking in order to discourage people from driving to the campus. In addition, using performance standards to regulate parking is easy and effective to monitor and should be considered as part of the CP/GUP. This should include the negotiation of joint performance standards with Palo Alto to comprehensively manage parking on the majority of Stanford lands.
- 96-18 18. The Circulation Element of the CP continues to lack detail. The CP/GUP should include a detailed and comprehensive Circulation Element and traffic analysis. Although the DEIR considers the project's impacts over a broad area, and although the DEIR proposes granting Stanford mitigation credit for participating in "cooperative trip reduction" (participating in multi-jurisdiction ventures that reduce traffic in the area surrounding the campus Mitigation TR-5C), there remains no specific plan for regionally sustaining the cumulative traffic generated by the development of the Stanford lands. The proposal to extend Campus Drive West is assessed superficially and dismissively (please refer to Comment #51 under the discussion of the DEIR. In addition, the focus of the circulation strategy for the CP appears to be to push traffic outward to the fringes of the GUP area (where it is more likely to impact neighboring communities) rather than accommodating it within on a hierarchy of streets that serves and encapsulates Stanford's traffic internally to the maximum extent practical.

The Menlo Park City Council supports creation of a detailed and meaningful hierarchy of streets. Where possible, the hierarchy should load and encapsulate Stanford traffic onto Stanford roads. Campus development should not rely on the infrastructure of adjacent jurisdictions. Specifically, campus access to and from Interstate-280 should be directed via Alpine Road and distributed internally to the campus using Junipero Serra Boulevard as the backbone and the Campus Drive loops. The City Council also supports the expansion of Campus Drive West between Stockfarm Road and Junipero Serra Boulevard. Listed below are examples of strategies that could be included in the Circulation Element to directly address regional traffic impacts.

- Circulation design should focus on regional traffic on applicant roads, such as Junipero Serra Boulevard and Interstate-280.
- Circulation design should improve interior circulation by improving the capacity of campus arterials, Campus Drive East and Campus Drive West, etc.

- Stanford should implement previously identified "triggered" mitigations, including improving the
 intersection of Campus Drive West and Junipero Serra Boulevard. Please refer to Comment #35
 under the DEIR for a discussion of the proposed mitigation at this intersection.
- 19. The City of Menlo Park had requested that the traffic analysis, including the use of any traffic modelers, conducted in association with the CP/GUP and/or environmental review should be conducted independent of Stanford University. Menlo Park would note that the traffic analysis was conducted by traffic consultants directly employed by Santa Clara County and using traffic models originated by the County. The analysis did rely upon some data furnished by Stanford University.
- 96-20 20. Given that the widening of roadways will result in a loss of the current scale of Stanford, the CP/GUP should include methods other than road widening for improving traffic conditions.
- 96-21 21. The CP/GUP should incorporate specific bicycle mitigation, including such items as an increase in Caltrain cars that allow bicycles and added bicycle lanes.

Comments on the Draft EIR

Land Use

- 96-22 1. The development levels projected in the CP/GUP appear to be based solely on Stanford's projections of its needs, emphasizing Stanford's private institutional goals over the public welfare. As a result, it does not seem that anyone has asked the larger question of whether the entirety of the proposal, including the two million square feet of commercial development and approximately two million square feet of residential development, is sustainable in the region, especially given the growth in the surrounding communities. The City Council requests that the DEIR assess the CP/GUP in terms of sustainability in the broader community.
- 96-23 2. The DEIR does not contain information on the totals of existing and planned development on all Stanford lands located in various jurisdictions. It is essential that Stanford lands be viewed in its entirety to understand the magnitude of the proposed change and the potential impacts related to that change. The City of Menlo Park 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. The information is available from the University, and appears in near ready-to-use form in Part IV of the 1980 Land Use Plan supplement, pages 33-45.
- 96-24 3. The DEIR 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. It is known that under the 1989 GUP, certain types of projects or projects within certain areas require an independent use permit and that these square footages are not included in the calculations of maximum square footages allowed under the 1989 GUP. This is stated in both the DEIR prepared for the Carnegie Foundation and the DEIR for the CP\GUP (Section 4.1.A.4). Although a total square footage for academic space anticipated to be developed under the 1989 GUP is provided (12,439,061 square feet), no similar figure is provided for all Stanford lands under the County's jurisdiction. In addition, the DEIR does

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not clearly state if this situation would continue under the proposed CP/GUP. The CP/GUP and DEIR 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. If no such maximum is included, what other mechanism is established or would be established to regulate the maximum amount of development on all lands under County jurisdiction?

The documents contain a lack of specificity or appropriate detail on which to base a meaningful review or environmental analysis of the proposal. As an example, the documents continue to emphasize the difficulty of precisely identifying facilities that will be required to support the University's teaching and research mission or their exact location. As proposed by Stanford, the distribution of academic development within the Development Districts was intended only to be illustrative for purposes of estimating environmental impacts. Development would not be limited to the specific distribution proposed in the GUP.

The Menlo Park City Council believes that the evaluation in the DEIR is inadequate unless it is based on a level of detail and specificity that is consistent with the application of zoning to the campus. Traditional zoning has at least three elements, including a defined area, permitted and conditional uses and development regulations. Specifically, detailed development areas are not defined, specific lists of permitted and conditional uses are not identified, exact locations of proposed development are not identified and development regulations, most notably Floor Area Ratios (FAR) is not provided in a number or percentage format. If existing County zoning would apply to these areas, these zoning regulations should be called out in the DEIR. If this is not the case, the DEIR should comment on the adequacy of the analysis given the flexibility of the proposed development. The CP/GUP should contain a refined grid of 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.

- 96-26
 5. Given the proximity of the West Campus District, the City of Menlo Park requests additional detail on the proposed development for this District. The DEIR states that between 302 570 residential units would be built in this district. How will the exact number of 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?
- 96-27 6. 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. Similarly, limited academic or temporary uses that are in keeping with the open space character are allowed in the Campus Open Space land use designation. In both cases, no definition is provided for "low-intensity" or "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. How will these terms be defined for purposes of evaluating future proposals? How can the DEIR assess impacts without knowing what level or type of development would be permissible?

96-28 7. The DEIR 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.

Open Space, Recreation and Visual Resources

- 96-29 8. The Menlo Park City Council recognizes that the proposed AGB will not provide for the permanent or long-term preservation of the open space area located in the foothills. Stanford's open space is a vital part of the mid-peninsula area. The CP/GUP should contain a specific and defined commitment to permanent open space. The City Council favors a more rigorous implementation of open space than promises of short-term restraint in the foothills. The City requests that the DEIR analysis the benefits and impacts associated with a requirement that Stanford transfer some of its development rights in the foothills for increased development rights in the urban core. This type of an exchange or transfer of development rights should persist as long as the development persists.
- 96-30 9. The DEIR should include a discussion of possible measures, such as a permanent commitment to open space and permanent restriction on development of office west of Junipero Serra Boulevard, as mitigation for identified significant and unavoidable impacts to open space.
- 96-31 10. 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?

Population and Housing

- 96-32 11. The DEIR should identify the net number of new units to clearly document the statement that there would be no loss in housing units.
- 96-33 12. By using gross new units, as opposed to net units, as the factor in the comparison of new units to population increase, the results of the comparisons are skewed to present a best-case scenario. Similarly, by using the upper limit of potential new faculty/staff housing, the results are also skewed to a best-case scenario. The DEIR should re-evaluate the impact of new housing demand using net units and the lower faculty/staff unit count to show a worst-case scenario. The mitigations should then be re-evaluated based on this new calculation. Although the proposed mitigation requiring the construction of the housing is beneficial, does it fully mitigate the housing demand being generated by the proposal?
- 96-34 13. The DEIR comments that under the cumulative condition, the proposed mitigation would fully mitigate Stanford's contribution to the local demand for housing. However, the DEIR has not addressed the increased housing needs related to other known Stanford projects, including the cancer center proposal, Carnegie Foundation proposal and the Mechanical Engineering Laboratory proposal. Please explain how, given the questionable ability of the CP/GUP proposal to meet all of the housing needs it is generating, that the proposed mitigation would fully mitigate Stanford's contribution to the local housing demand.
- 96-35 14. The DEIR has described that, with the completion of 480 units of new single graduate housing and the 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

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would be exclusive of the Medical Center and Stanford Research Park. What mechanisms are planned or included in the proposal to address the existing need?

96-36 15. The mitigation requiring Stanford to identify additional housing sites may be beneficial, but it does not contain any implementation mechanism for the actual construction on the identified housing sites. Please explain how this can be an effectively implemented?

Traffic and Circulation

- 96-37 16. Section 4.4.A.1 is a discussion of applicable plans and policies affecting transportation of various agencies and jurisdictions affecting the study area. The section does not mention the plans and policies of the City of Menlo Park. Please include Menlo Park's plans and policies in this discussion.
- 96-38 17. The first technical section, 4.4.A.2 discusses methodology. The Santa Clara County Center for Urban Analysis (CUA) Travel Forecast Model (TRANPLAN based VTA CMP version) was used for forecasts of travel for all activity in the region except for the new trips generated within the GUP area. This is a parent model of the Palo Alto Transportation Forecast Model which Menlo Park had expected would be used for the analysis. This difference in which model was chosen is not believed to be significant. However, there are other nuances of the forecast methodology that may affect the reasonableness of the results and adequacy of the analysis. These include:
 - Menlo Park's analyses with its own derivative of the CUA and Palo Alto models disclosed that these models contain significant omissions and distortions of the street and highway network in southern San Mateo County. The nature of these omissions and distortions has a significant effect on the patterns of route choices by which traffic is projected to move to or through the Menlo Park and Stanford area. It is not known if these omissions and distortions have been corrected in the version of the model used for the current DEIR. If not, the reasonability of the traffic forecasts on which the impact analysis is based is in question. Please review details of the model network description with Menlo Park staff and consultants.
 - The CUA model does not consider certain long distance regional trips and regional through trips. The CUA model also includes a feature to scale back peak period 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 regional 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 DEIR and the nearly concurrent Cancer Center EIR which relied upon the Palo Alto model for its traffic projections. A subsequent section herein highlights some of the troubling differences in findings of level of service analysis between this DEIR, the Cancer Center EIR and the earlier Sand Hill Road Corridor Projects EIR. The differences between the Cancer Center EIR and this DEIR are particularly troubling because the traffic analysis of both documents were prepared by the same traffic engineering consultant for the same ultimate project sponsor in an almost

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completely concurrent time frame. Please explain in detail the differences in the technical findings between this CP/GUP analysis and the Cancer Center EIR.

- 96-39 18. 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 implications of this are as follows:
 - Routes used by new GUP area 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 has no opportunity to forecast that certain other traffic would divert to, say, Valparaiso Avenue in reaction to added GUP traffic-created congestion on Sand Hill Road. For the record, such a diversion would be as much an impact of the GUP development as would be the case if newly generated GUP area traffic used the diversion route.
 - The distribution of other traffic from future development on Stanford lands outside the GUP area has still apparently been forecast with the artificial control total on trip exchanges across the county line in place. Hence, the overall result tends to understate the impact of GUP and cumulative traffic (especially traffic from new uses on other Stanford lands) on roadways within Menlo Park.

Menlo Park is concerned that the above characteristics of the forecast procedure may compromise the ability of the analysis to identify the severity of the impacts of the Project on traffic conditions in Menlo Park. The validity of this concern is substantiated in a subsequent section by comparison of the results of the CP/GUP DEIR findings to those of other relevant EIRs.

- 96-40 19. Section 4.4.B describes the existing transportation setting. The paragraphs on transit service include the "Menlo Margurite" (page 4.4.11) but fails 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.
- 96 -41 20. The section on Transportation Demand Management asserts that "the effectiveness of TDM measures improved by 62 percent between 1987 and 1998. However, the text fails to note what is evident in the data presented in Table 4.4-4, 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. That is to say, two-thirds of the TDM growth took place in the first three years of development under the 1989 GUP when only about 31 percent of development took place. From 1991 through 1998, while 69 percent of the GUP development to that point occurred, the TDM program experienced only one-third of its total growth. These data, which

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indicate a declining participation in TDM from new development, undermine the DEIR's presumption that in the future the TDM program will account for an equal or increased portion of campus generated travel. Stanford University's assertion of meeting its "no net new trips goal" reproduced as Table 4.4-5, may include taking credit for Margurite rides internal to Stanford lands and fail to account for peak period trips to/from off-campus sites by individuals housed in new oncampus 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 exceeded its goal of no net new trips over the lifetime of the 1989 GUP may be incorrect or optimistic. Please address these issues.

- 96-42 21. One traffic consequence of the GUP is not evaluated at all. The DEIR trip generation analysis considers new traffic generated in the GUP area. However, 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 the vacated off-campus housing is one that makes more trips, longer trips and more frequently makes trips by auto rather than non-auto modes. 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. This element is not considered in the trip generation and subsequent traffic capacity/level-of-service analysis. Please address this issue.
- 22. Another observation on the trip generation analysis is that it presumes what appear to be unreasonably low rates of peak travel to/from off-campus sites by campus-resident personnel. As the campus develops more varied types of housing, particularly including family housing, a large increase in the rate of travel to off-campus sites by spouses and other family members than reflected in Table 4.4.18 would be expected. Please document the basis for the assumptions regarding this portion of the trip generation in the DEIR or revise the assumptions to more reasonable levels.
- 96-44 23. Section 4.4.E.5 presents the Year 2010 analysis of the GUP impact on intersections. Since the land use plan considered in the analysis is only exemplar (Stanford would have broad discretion as to where to locate new development within the GUP area; it is not bound by the locations of new uses presumed in the DEIR analysis), the actual traffic experienced in particular areas surrounding the campus could be substantially different than projected for the intersection analysis. As a result, impacts and mitigation needs could be quite different than forecast in the DEIR. Please address this issue.
- 24. The analysis shows significant project impacts at eight Menlo Park intersections in the pm peak and six in the am peak. Affected intersections are El Camino Real/Valparaiso, Ravenswood/Middle (pm only), Sand Hill Road/Sand Hill Circle, Santa Cruz/Oak, Alpine/Junipero Serra/Santa Cruz, and Willow/Middlefield (pm only). The impact at El Camino Real/Middle is particularly noteworthy. This intersection is shown operating at LOS D just above the threshold from LOS C in the existing condition. As Table4.4-23 shows, it deteriorates to LOS F in the 2010 No Project and Project Conditions.
- 96-46 25. A systems 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 apart to truly operate as independent intersections. In theory, an intersection complex could operate at a lower average level of delay when considered as a system than if the component intersections are analyzed as isolated intersections. But this is only true when the intersections are operating at better than LOS F, the acknowledged condition of the subject Sand Hill/Santa Cruz/Alpine/Junipero Serra intersection complex. Therefore, it is implausible that the analysis of this complex as a system would show a markedly lower level of delay for this site. Menlo Park makes this point to emphasize a practical reality that the City has encountered in its attempts to operate this intersection complex as efficiently as possible as a system. That practical reality is that the combination of intersection spacing and volume and pattern of traffic movements that occur there does not lend itself to a systematic operation that is superior to the results that would theoretically occur if the intersections are analyzed as independent isolated intersections. Menlo Park's practical experience is that the theoretical analysis as isolated intersections defines a "best case" level of operation not attained in reality and that the actual system's operation is somewhat worse. The concern is that the analysis has not disclosed the full extent of project and cumulative traffic impact at this location. A further concern is that the not-fullydisclosed impacts go beyond the mitigation capacity of the intersection mitigations identified in the Menlo Park General Plan and that still further mitigation would be required.

- 96 -47 26. 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 only to about 63 seconds in the am, 112 seconds in the pm, both still in the LOS F range. Hence, the DEIR, though not making this point, demonstrates that if the traffic impacts at this location of overall planned development of the Stanford lands are to be mitigated, something far more than the mitigation measures identified in the DEIR must be considered.
- 96-48 27. Section 4.4.E.8 details future parking considerations. The GUP proposes 2,873 new parking stalls, 2,325 without the Performing Arts Center. The DEIR does identify that providing this supply of parking, which is at the demand rates for the various individual uses without considering time-of-day occupancy could result in parking surpluses that might undermine trip reduction efforts. The possibility of limiting parking totals to the existing ratio of stalls to campus population is identified and would result in provision of only 2,267 new stalls. Siting of parking supply as analyzed does not unduly weight parking provided toward the Menlo Park side of the campus but could still become a concern as Stanford would be free to reallocate locations of uses within the GUP area in the future.
- 96-49 28. Section 4.4.F analyzes the proposal to extend Campus Drive West to Alpine Road. Intersection LOS analysis shows that the extension would result in dramatic improvement to the Alpine/Junipero Serra/Santa Cruz intersection which would be improved from LOS F in both peaks to LOS B(am) and C (pm). However, the assessment is confounded by the apparent error in the 2010 With Project computation for Sand Hill/Santa Cruz noted previously (where adding project traffic to the 2010 base produces dramatically reduced congestion). The analysis of traffic effects may also not fully reflect the benefits of altered routes that the extension would make possible. It is not clear whether

assignments with the extension were run through the CUA model or simply analyst dictated. However, the projected traffic volume data presented makes evident that the analysis presumes none of the east-west movements projected on Sand Hill Road through the Santa Cruz intersection without the extension that would shift to the Campus Drive West/Alpine corridor if the extension were made. This is a completely illogical presumption that invalidates the traffic component of the analysis. It is evident that the traffic mitigation benefits of the extension would be considerably greater than indicated in the DEIR.

- 96-50 29. Section 4.4.G considers transportation impacts and mitigation. The analysis concludes that the impacts on transit, bicyclists and pedestrians, parking and freeways are less than significant without mitigation requirements. We note 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 for the segments of 101 north and south of Willow had they been examined in the context of the DEIR traffic forecasts as prepared. We doubt that even if the distortion of the CUA model network farther north in San Mateo County (which tends to excessively bias some traffic away from 101) were adjusted, that significant freeway impact would be found on the unstudied sections.
- 96-51 30. Significant traffic impacts are found at 17 intersections. Eight are in Menlo Park, five in Palo Alto, two in Santa Clara County and two within Stanford lands. Menlo Park is obviously the most impacted jurisdiction. Intersection mitigations are presented in TR-5D for each impacted intersection in Menlo Park (none of the Menlo Park intersections are affected in Mitigation TR-5A which are the "easy" to implement measures). The DEIR notes that each mitigation in Menlo Park is within the jurisdiction of Menlo Park and that Santa Clara County has no authority to require that the mitigations be carried out. It is noteworthy that even after "mitigation", four of the eight impacted intersections within Menlo Park would remain at LOS F in the pm peak and that a fifth, Willow/Middlefield, would be within one-tenth second of average delay of remaining at LOS F for the pm peak. The mitigations identified purportedly only mitigate the impacts of Stanford's development within the GUP area. The DEIR identifies that because Stanford will provide only a fair share portion of mitigation funding, because other jurisdictions must consent to implementing the mitigations and because the County cannot mandate trip reduction measures, the intersection impacts must be classified significant and unavoidable.
- 96-52 31. Mitigation TR-5B, Trip Reduction and Monitoring, is also intended to mitigate intersection traffic impacts. It includes continuation of existing Stanford TDM programs and a laundry list of other possible programs to be "considered" including Universal Transit Pass, increased Margurite frequencies and routes, and other actions. A monitoring program to measure the effectiveness of trip reduction will be conducted. The monitoring involves an annual count of traffic crossing a cordon around the GUP area, simultaneous counting of through trips crossing the entire cordoned area and determining traffic generated by uses in the GUP area by deducting the through traffic from the cordon counts. Adjustments will also be made for traffic to the Medical Center uses along Campus Drive West and for GUP destined personnel that park in the Quarry lots outside the cordon. This approach, measuring Stanford's TDM efforts in relation to ground counts (rather than by a hypothetical trip rate applied to a hypothetical campus population as in the past) is responsive to Menlo Park's request for such a system. Potential loopholes are the adjustments for parking in the Quarry lots and for Medical Center traffic use of West Campus Drive as well as adjustments due to

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the changes in cordon station location that result from opening of Stock Farm to Sand Hill and shift of other station locations from Pasteur at Sand Hill to Welch west of Pasteur and from Quarry at Arboretum to Quarry at Campus Drive West. In addition, the monitoring system is limited to traffic generation for only the GUP area. There is no overall monitoring system for the total traffic generated by development of Stanford lands overall. This is a significant shortcoming.

- 96-53 32. Mitigation TR-5C involves Cooperative Trip Reduction, crediting Stanford's "no net new trips" achievement for participation in programs that reduce trips in the areas surrounding the campus. As a hypothetical example, if Stanford were to pay fifty percent of the cost of a Dumbarton shuttle that serves downtown Palo Alto and Stanford and the service achieved 100 riders diverted from driving cars, with 99 going to downtown Palo Alto and only 1 going to Stanford, Stanford would still get a credit of 50 trips toward meeting its trip reduction goal. A potential inequity in this mitigation measure that must be monitored would be if the "cooperative reductions" were to be concentrated on one side of campus rather than relatively evenly distributed.
- 96-54 33. Section TR-6 addresses traffic impact on residential streets. The DEIR makes the following assertion: "There is no data showing a relationship between Stanford traffic and cut-through traffic on neighborhood streets in Palo Alto and Menlo Park." This statement, which leads the reader to draw the inference that Stanford development does not cause cut-through traffic in the neighborhoods of surrounding communities, is misleading. The reason there is no data showing such a relationship is not because Stanford development does not cause cut-through traffic in neighborhoods; it is because the methodology employed in the study assures that there would be no such data. The routes of all Stanford traffic generated by development in the GUP area are dictated by the analysts; there would be no neighborhood cut-throughs by this traffic unless the EIR analysts decided to dictate that there would be some. Because the GUP traffic is not assigned through the CUA model, the traffic assigned by that model has no opportunity to divert in reaction to the incremental congestion that would be created by the GUP traffic. Moreover, since many residential streets that might be diversion routes are not even represented in the CUA model, the possibility that evidence of cutthrough traffic could be created in the methodology employed is still less likely. So the statement that there is no evidence of Stanford development's relation to cut through traffic is meaningless. To its credit, the DEIR discloses that cut-through traffic still might occur due directly to or in reaction to GUP traffic and that its extent cannot be known through the DEIR studies undertaken. However, it concludes that the impacts would be rendered less than significant by Mitigation Measure TR-6A which requires Stanford to participate in any studies of and mitigation of neighborhood traffic impacts to the extent of Stanford's causation. This mitigation measure and the presumption of mitigation of impacts to less than significance are both flawed. First, the measure passes on to the local communities the burden of identifying and documenting the extent of Stanford's impacts on cutthrough traffic, a burden properly the responsibility of this DER. Second, effective consensus solutions to cut-through traffic problems are frequently difficult to achieve. There is no guarantee that Stanford's participation in a study will result in implementation of an acceptable mitigation measure. For these reasons this impact should be categorized as significant and unavoidable.
- 96-55 34. Mitigation Measure TR-6B would require site-specific traffic impact studies for "large" projects within the GUP development. It is presumed to reduce the impact of individual projects to "less than

¹ In the TRAFFIX model, the analysts specify what routes all the traffic assigned within TRAFFIX will use.

significant". No objective definition of "large" is provided although examples of some sample projects considered to be "large" are identified. Moreover, nothing in this measure would affect a situation where Stanford, 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 DEIR development scenario, resultant in more extensive and concentrated traffic impacts near the land use concentration. Hence, the impacts should be regarded as significant and unavoidable.

- 96-56 35. The DEIR recommends 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 intersection would remain at LOS F in the am and pm peaks with the mitigation as proposed in the DEIR..
- 96-57 36. Mitigation Measures TR-7A through TR-7H are concerned with construction impacts on transportation. The DEIR concludes that these eight mitigation measures reduce construction impacts on transportation to less than significant. We note that there is no consideration of the impacts on congestion of peak period travel by construction workers. We also note that Figure 4.4-17 shows such a limited network of truck routes that a truck from US 101 or east of it could not reach the GUP area on a truck route without traveling as far north as Woodside Road or as far south as San Antonio Road. Given the extensive 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.
- 96-58 37. Section 4.4.H asserts that by analyzing the project in the context of 2010 conditions, the DEIR fulfills the requirements for cumulative analysis of traffic impacts and mitigation measures. While the 2010 traffic analysis does evaluate a cumulative condition, the only intersection mitigations considered are mitigations solely of GUP project impacts, not mitigations 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 in the immediate vicinity of the GUP area, the DEIR should contain a good faith effort to quantify Stanford's overall contribution to cumulative traffic impacts and fair share of responsibility for mitigating the full cumulative condition. It does not do so. Finally, many of the mitigations the DEIR assumes to mitigate the GUP project are the same intersection mitigation measures Stanford has relied upon to mitigate the impacts of its other concurrent development projects in the general area such as the shopping center expansion and housing in the Sand Hill corridor, the Medical Center expansion. Cancer Center and other projects. The benefits of a particular mitigation may be of a scale to offset the impacts of an individual project taken alone, but is not nearly sufficient to offset the impacts of all of the projects taken together. Yet, as the environmental review of each of Stanford's major projects has proceeded, each has already claimed the benefit of the same specific intersection mitigation improvements as an offset to traffic impacts. The potential mitigative effect of many of the intersection mitigations identified in the GUP DEIR has already been used up by other Stanford projects, in some cases two or three times already. This multiple counting of the limited mitigative capacity of the same intersection improvement as offset to impacts of several projects is not consistent with the good faith effort to identify and mitigate impact as demanded by CEQA. For these reasons the cumulative analysis is inadequate and critically deficient. All of the foregoing is illustrated in attached Tables 1, 2 and 3 which compare the projections of the Sand Hill Corridor Projects EIR, the Cancer Center EIR and this CP/GUP DEIR for the intersections of El Camino

Real/Ravenswood, El Camino Real/Glenwood/Valparaiso and Sand Hill/Santa Cruz. The progression of deterioriative effects of Stanford's projects, despite claimed mitigation, is evident and marked.

- 96-59 38. Comparison of these tables also shows tremendous and disturbing inconsistencies between the projections. For instance, at El Camino Real/Ravenswood (Table 1) the pm peak Year 2000 projection for Sand Hill Corridor Projects is considerably exceeded by the existing 1999 conditions documented by both Cancer Center and CP/GUP. More disturbing is the fact that the 1999 "existing conditions" in Cancer Center and CP/GUP are substantially 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 + Project for Cancer Center and the 2000 No Project for CP/GUP should be more or less identical yet they are vastly different for both the am and pm peaks.
- 96-60 39. At El Camino Real/Valparaiso/Glenwood there are similar significant discrepancies the 1999 existing conditions as documented by Cancer Center and CP/GUP and between the 2000+Project for Cancer and the 2000 No Project for CP/GUP (which should be very similar if not identical). These discrepancies exist in both am and pm peaks. The pattern for the 1999 existing and the 2000 + Project for Cancer Center versus the 2000 No Project for CP/CUP at Sand Hill/Santa Cruz for both the am and pm peaks shows the same patterns of significant and disturbing discrepancies as at El Camino Real/Valparaiso/Glenwood. The seriousness of the inconsistencies calls to question the validity of the entire traffic analysis for the CP/GUP. Please address these matters in depth.

TABLE 1: EL CAMINO REAL/RAVENSWOOD

Project/Condition	AM DELAY	PM DELAY
Sand Hill Projects		
1996 Existing	na	37
2000 No Project	na	44
2000 + Project	na	44
2000 + Project & Mitigation	na	34
Cancer Center		
1999 Existing	56.1	50.9
2003 + Project	62.3	61.5
2003 + Project & Mitigation	34/6	35.4
2010 + Project	83.7	84.2
2010 + Project & Mitigation	38.5	60.5
CP/GUP		
1999 Existing	39	57.4
2010 No Project	100	176
2010 Project	114	187.1
2010 + Project & Mitigation	40.1	92.7

(F)

TABLE 2: EL CAMINO REAL/VALPARAISO/GLENWOOD

Project/Condition	AM DELAY	PM DELAY
Sand Hill Projects		
1996 Existing	na	28
2000 No Project	na	60
2000 + Project	na	43
2000 + Project & Mitigation	na	27
Cancer Center		
1999 Existing	33.4	39.0
2003 + Project	na	na
2003 + Project & Mitigation	na	na
2010 + Project	60.5	159.4
2010 + Project & Mitigation	25.5	60.5
CP/GUP		
1999 Existing	26.3	31
2010 No Project	32.1	69.3
2010 Project	42	77.2
2010 + Project & Mitigation	29.9	44.4

TABLE 3: SAND HILL/SANTA CRUZ

Project/Condition	AM DELAY	PM DELAY
Sand Hill Projects		
1996 Existing	37	61
2000 No Project	59	134
2000 + Project	133	92
2000 + Project & Mitigation	49	56
Cancer Center		
1999 Existing	43.7	51.1
2003 + Project	189.1	191.3
2003 + Project & Mitigation	101.6	144.6
2010 + Project	220.2	313.7
2010 + Project & Mitigation	117.6	287.8
CP/GUP		
1999 Existing	33.6	52.7
2010 No Project	73.3	154.4
2010 Project	76.7	137.2
2010 + Project & Mitigation	63.0	112.0

Hydrology and Water Quality

- 96-61 40. The DEIR does not consider all potential development under the CP/GUP, only that development proposed in the Academic Campus and Campus Residential designations. The DEIR should reassess the evaluation of water hydrology and quality with consideration of the potentially higher levels of development. This is yet another example of why it is appropriate to have knowledge of the full development potential for all Stanford lands.
- 96-62 41. Mitigation HWQ-3c requires that Stanford not engage in new land uses or practices that could pose a threat to the groundwater supply. The mitigation also requires that information on the use of pesticides be provided to any leaseholders. The mitigation does not clarify how this mitigation would be effectively implemented. What specific mechanism would be established to ensure compliance with this mitigation? Similarly, all leaseholders should be held equally responsible for implementation of the mitigation.

Hazardous Materials

96-63 42. The University's safety programs include many elements to protect workers within specific facilities and the general public. However, other than a general description of the University's Emergency Preparedness and Response Plan, no reference is made to any programs for notification of accidental release to surrounding property owners/residents or other jurisdictions. What procedures are in place for notification and to addresses accidental release of hazardous chemicals as it relates to adjacent properties and jurisdictions? How are surrounding residents and jurisdictions to be made aware of the procedures?

Biological Resources

96-64 43. The Menlo Park City Council supports Option 2 mitigation for Impact #1, loss of CTS habitat since this is the only mitigation that would reduce the impact to a less than significant level.

Air Resources

- 96-65 44. Tables 4.11-1, 4.11-2 and 4.11-3 provide information on the federal and state ambient air quality standards and the Bay Area attainment status by pollutant. However, no specific levels of pollutants are provided in Table 4.11-3 that would allow a direct comparison between the Bay Area levels of pollutants and state or federal standards. The City requests that this information be provided.
- 96 -66 45. The DEIR states that the Bay Area must achieve clean air conditions for three straight years to be able to reapply for attainment status. This three year period could be 1999, 2000 and 2001 or 2000, 2001 and 2002. Were clean air conditions achieved in 1999?
- 96-67 46. In regard to the CAL3QHC dispersion model used to estimate 1-hour CO concentrations during peak travel periods, it would be important to understand exactly what information was used in the model. For example, assumptions may have been made about stop sign/signal configuration or future roadway configurations that are not appropriate. If an assumption was made that Sand Hill Road would be widened in Menlo Park's jurisdiction, this could result in inaccurate, and possibly

- underestimated, air emissions given the fact that idle emissions account for a substantial portion of the total emissions at an intersection. What specific assumptions were made in the model, including the assumptions on stop sign/signal and roadway configurations?
- 96-68 47. In reference to the analysis of VOC, NOx, and PM10, why does the model (URBEMISg) only use information based on increase in residential units and students? Why is the increase in non-residential square footage and employees not included and, if included, how would the results of the analysis differ from what is presented?
- 96 -69 48. In reference to the analysis of Impact #6, exposure to substantial levels of toxic air contaminants, the DEIR states that the proposal does not contain any sources that would exceed the BAAQMD permitting threshold. How can this be determined when the CP/GUP does not contain any specific projects? What is the basis for this statement in the DEIR?

Noise

- 96-70 49. This section briefly mentions Menlo Park's Noise Ordinance, but does not use it as a point of discussion assuming that it is less restrictive than Palo Alto's ordinance. In fact, it contains limits on construction noise (noisy construction work may be done 8:00 am to 5:00 pm, Monday through Friday only) that are more restrictive than either Palo Alto or the County of Santa Clara and should be considered as mitigation to construction noise impacts.
- 96-71 50. The adequacy of the assessment of traffic-related noise is dependent on the adequacy of the traffic study. It would be appropriate for this analysis to be reconsidered following any modification of the traffic study. In addition, it does not seem appropriate to conclude that the project's impact to the cumulative condition is de minimis. This is tantamount to saying that every future project's addition to the traffic is de minimis and therefore should not be considered a significant impact, yet it is the accumulation of these projects that creates the future traffic scenario. Please explain the basis for the statement that the project's impact to the cumulative condition is de minimis.

Alternatives

96-72 51. The City of Menlo Park's request that an extension of Campus Drive West to Alpine Road be considered is incorporated in the alternative components analysis as Component TRAN-B. The assessment of this component admits that it could reduce traffic impacts but identifies potential adverse impacts involving such matters as water quality impacts due to construction of crossings of creeks and roadway runoffs, visual impacts of nighttime roadway lighting of ridgelines, extensive grading and related loss of acreage of oak woodland and annual grassland and opening the area traversed to additional growth pressure. The evaluation ultimately rejects this alternative on the contention that it would have unacceptable impacts on open space and biological resources.

Unfortunately, the DEIR analysis grossly overstates the potential adverse effects of the roadway extension component. Figure 7.4 presents the alignment of the roadway extension considered. Figure 2.3 provides a topographic view of the area. Comparison of the two figures reveals that the alignment considered for the extension is about three times as long as the most practical alignment for the extension and traverses more difficult topographic

features. If a more practical alignment were considered, it would be expected to cut the purported impacts of the component on grading, loss of oak woodland and annual grassland by two-thirds or more, and eliminate ridgeline lighting impacts. The purported growth inducing pressures in the area traversed by the road is a non-issue that can be dismissed since the project applicant controls the entire area and can dedicate this area as Open Space as part of the CP/GUP. Potential water quality impacts of construction of creek crossings and roadway run-off can be avoided or mitigated by design or construction techniques. The evaluation of this component as presented in the DEIR is completely inadequate and misleading. It should be re-evaluated on the most practical alignment of minimum length and on the assumption of the minimum roadway cross-section necessary to achieve the traffic mitigation effects desired. The announcement subsequent to the circulation of the DEIR that the Stanford University Athletic Department is considering a major expansion and realignment of the Golf Course makes obvious that a roadway alignment near or even across the existing Golf Course is reasonably plausible and should be considered.

Again, thank you for the opportunity to comment on the DEIR. We would appreciate written responses to all comments submitted on both the CP/GUP and DEIR documents. We also look forward to continuing participation in the review process for the proposed CP/GUP. If you have questions related to any of the above noted comments, please feel free to contact me at (650) 858-3400.

Sincerely,

Arlinda Heineck Chief Planner

c: Menlo Park City Council

Menlo Park Planning Commission
David Boesch, Menlo Park City Manager
Kris Schenk, Director of Community Development
Dan Smith, Menlo Park Transportation Consultant
Jamal Rahimi, City Transportation Manager
David Neuman, Stanford University
Andy Coe, Stanford University
Ed Gawf, City of Palo Alto
Mayor and City Council, Town of Portola Valley

rlinda Herreck

Mayor and City Council, Town of Woodside Board of Supervisors, County of San Mateo

Denise Dade, Committee for Green Foothills

V:\\trmcm\2000\aah\\tr072600 - Stanford cp gup DEIR response



Betcakekos@aol.c

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

08/07/00 03:49 PM

Subject: Keeping the original 18 holes of Stanford Golf Course intact

August 7,

2000

Dear Planner Jones,

97-1 As I stated in my August 3rd speech to the Santa Clara County Planning Commission, I urge you to require the Stanford University to stick with the current "OPEN SPACE" zoning for the "GOLF COURSE LANDS" and ask Stanford to seek housing sites in the core campus area utilizing the principles of "HIGH DENSITY HOUSING."

Many thanks for the time you have spent on this subject.

Betty Koski Captain of Stanford 18 Hole Women's Section Member of the above group for 25 years Current resident of Los Altos, CA

Katie Shoven 781 Frenchman's Road Stanford, CA 94305

August 7, 2000

Sarah Jones Santa Clara County Planning Office 70 West Hedding Street, East Wing 7th Floor San Jose, CA 95110

Dear Ms. Jones:

This letter is in response to Santa Clara County's Draft Environmental Impact Report (DEIR) for the Stanford Community Plan and General Use Permit (GUP). I will address two points: 1. School commute routes for children living on the Stanford Campus; and 2. Negative impacts of traffic on the Stanford Campus residential neighborhoods.

I have lived on the Stanford Campus for the past 17 years. During the past 9 years I have been involved in traffic safety issues involving students from the campus destined for L.M. Nixon Elementary School. I served terms on Nixon's PTA as chair of the Traffic Safety Committee, co-President of the Nixon PTA, member and co-chair of the School Site Council, and Nixon's parent delegate to Palo Alto's City-Wide School Commute Safety Study. Currently, I am a community member of the Building for Excellence Committee at Nixon. I am also a 5-year resident member of Stanford University's Junipero Serra Boulevard Task Force and a member of the Stanford Campus Residential Leaseholder's (SCRL) Junipero Serra/Stanford Avenue Working Committee. I am also familiar with school commute safety issues at Jane Lathrop Stanford Middle School on East Meadow in Palo Alto, and at Gunn High School on Arastadero in Palo Alto. However, I am writing to you as a Stanford Campus resident and the parent of a school aged child.

- 1. School commute routes for children living on the Stanford Campus.
- Since campus children who attend Palo Alto Unified School District (PAUSD) schools must travel on Stanford, Palo Alto and County roads, I would like to see the inclusion of a specific articulated plan in the final EIR for school commute traffic safety for our children. I wish to note that Stanford's Planning Office and Public Safety Office have been quite supportive of efforts to address traffic safety for campus children going to Nixon Elementary School. A number of safety problems were improved near Nixon School four years ago due to Stanford's assistance to the Nixon PTA and the school principal by helping to facilitate communication with County Roads and the CHP. The SCRL also provided communication support and they allocated funds to pay for safety improvements at the school's alternative drop off locations. To me, it appeared that PAUSD viewed Nixon's traffic problems as outside their purview and County Roads seemed ill prepared to provide leadership in school zone and neighborhood traffic

calming improvements. I hope that County Planning will 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.

Children living on campus can travel to their schools either by foot, bicycle or in cars. Many parents with school age children have expressed disappointment that the routes to schools aren't more pedestrian and bike friendly. The result has been that more parents choose to drive their children to school (the exception being those middle school students who ride the PAUSD school bus from Nixon to JLS) because of their fear that the streets are too unsafe for their children. More cars and more congestion on and off campus have fueled this perception. It should be noted that many campus children must cross or travel on high volume (and some high speed) streets (Stanford Avenue, Page Mill Road, Junipero Serra Boulevard, El Camino Real, Raimundo Way, Peter Coutts, Bowdoin, Campus Drive East) as well as find their way through questionably safe intersections on or near the aforementioned streets. The DEIR notes some additional turning lanes and intersection expansion to accommodate traffic on high profile streets, but it certainly does not take school commute route safety into consideration and seems to favor automobile traffic over pedestrian and bicycle traffic. Current conditions as well as projected demographic shifts on campus that reflect an increased number of school-age children point to the importance of traffic calming measures for school commute routes and streets in the residential neighborhoods. Trip reduction on and off the Stanford Campus is an expressed goal of all stakeholders but steps must be taken to ensure the safety of those willing to walk or bike.

98-2 2. Negative impacts of traffic on the Stanford Campus residential neighborhoods.

I believe it is important to study current as well as potential increased negative impacts of traffic in and around the internal campus residential neighborhoods and I would like to see enforceable mitigations included in the EIR. Speeding, cut-through traffic can be observed at a number of locations on internal campus residential streets. Because of the rural character of much of the residential subdivision, some areas do not have sidewalks for pedestrians or bike lanes for bicyclists making it necessary to share street space. The intersection of Raimundo Way and Stanford Avenue, a high traffic area with documented visibility and physical problems, has been caught in a multijurisdictional implementation quagmire (PAUSD, Stanford and County Roads) for almost two years despite recommendations for improvement contained in the City-Wide School Commute Safety Study commissioned and approved by the City of Palo Alto. Residents living on Junipero Serra Boulevard are already faced with very unsafe entrance/exit situations to their homes. Residents living adjacent to Junipero Serra Boulevard are already subject to escalating noise and pollution from cars as well as delivery and construction trucks (despite expressed requested mitigations to the 1989 EIR).

While it is important to consider regional traffic impacts in the DEIR, it is equally important to consider impacts to the internal residential campus neighborhoods and to

complete the unfinished business from the 1989 EIR. The cumulative effects of projected traffic increases incurred under the new GUP will make this all the more necessary.

Thank you for your attention.

Sincerely,

Katie Shoven

c: Stanford Campus Residential Leaseholders

2161 Ashton Ave. Menio Park, CA 94025 Aug.6,2000

Planning Commission Santa Clara County San Jose, CA

Gentlemen:

- 99-1 I am writing to recapitulate my comments on the EIR from the meeting of August 3, 2000. First, regarding the transportation portion of the draft EIR, an area close to Stanford which is heavily impacted by Stanford traffic, namely the Alameda de las Pulgas and University Heights, is omitted while other areas farther away are included. This is a serious omission, i enclose a copy of a map from the EIR with the area in question marked on it.
- 99 -2 Second, regarding housing for students and staff, Stanford is in the position of the proverbial brother-in-law who blows his paycheck at the race track and then comes for extra help. Instead of building retirement housing affordable for professors willing to vacate their campus homes (I know such persons), Stanford built a complex far too expensive for any retired professor I know. Also, as leases expired, instead of filling Oak Creek or other properties with students at affordable rates, the university allowed Oak Creek to rent at market rates (\$2.000 for a one bedroom apartment), built more market rate apartments not affordable to students and built huge offices for lawyers.

Stanford also continues to make it very hard for students of look for off campus housing. The housing office requires inflexible long-term leases with heavy financial penalties for leaving if the student finds something off-campus and it gives poorly timed notice about housing on campus, often leaving students an impossibly small time window in which to find a place. The booklet prepared by the graduate students about housing issues gives many examples of harsh and unreasonable treatment by the university. They are indeed in a difficult position as they are unfortunately being used as pawns. This situation is the fault of the university, not of the community.

(Parenthetically, I would note here that the graduate students seem also hindered by their own expectations. I regularly list rooms for rent at reasonable rates with Stanford housing, but have not had a Stanford graduate student ask to rent in years. Both the housing office and graduate students to whom I have spoken tell me they are not willing to rent a room where the householder is not their same age and really want their own apartment. Instead I rent mainly to foreign-born postdoctoral researchers who seem more open-minded.)

99-3 Third, as a private property owner, I am subject to detailed zoning rules. I submit that Stanford has has enough use permits exceeding their legal zoning. At present the university is effectively a very dense city with poor infrastructure on land zoned as agricultural with no coherent general plan. It is time to bring this situation into a rational shape consistent with zoning practices in the surrounding communities.

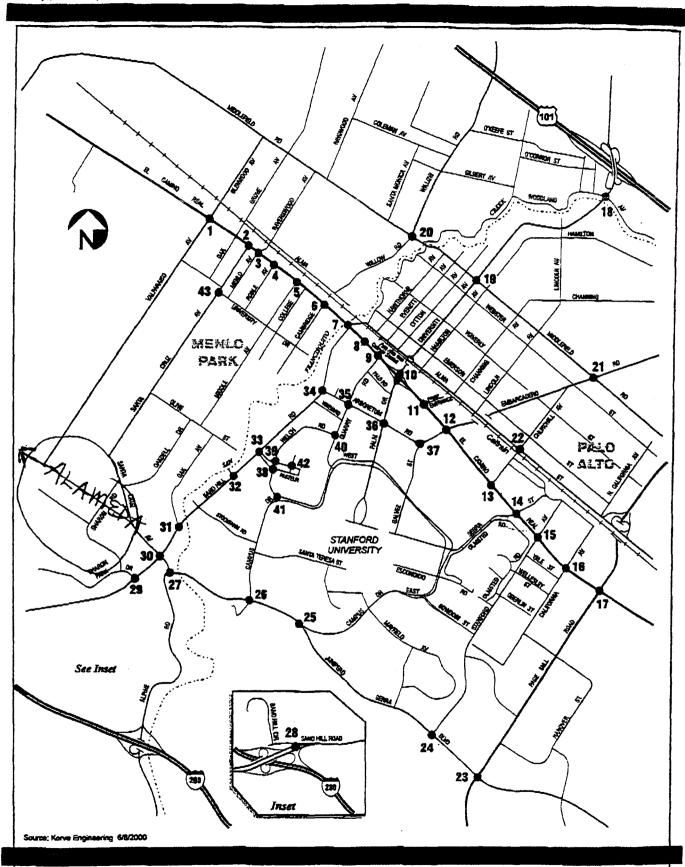
I would add here in response to remarks made at the meeting that the buildings that make some portions of Stanford lands south of Junipero Serra less than 100% pristine were, as I understand it, grandfathered in in prior zoning. These are not to be taken as representing what should be there consistent with current zoning. As regards the need for academic space and for the Carnegie Institute, Stanford has land elsewhere, but choses to use it for

other purposes. An example of this is, of course, the extremely expensive retirement complex on Sand Hill and the more recent. Hewlett Foundation project along Sand Hill near Alpine. There is no logical reason for putting the Carnegie project across Junipero Serra, if indeed it needs to be at Stanford at all, when there are other places to put it.

Also, a remark was made that Stanford has been a good steward of its lands. Aside from its actually high urban density, which was addressed by another speaker, and the enormous amount of traffic generated by the medical center and associated research facilities, there is the little- known issue of Stanford as a toxic waste site. There are two federal superfund toxic sites on Stanford lands on Page Mill Road as well as nine state-supervised toxic leach sites at the Hillview-Porter site near Junipero Serra. And that's just the toxics we know about.

I urge you to: I. not approve development across Junipero Serra, 2.require permanent setaside of open space as a precondition for any further development and 3. approve only housing to be developed until Stanford can demonstrate a vastly improved jobs-housing balance, 4. require a serious general plan with zoning regulations that meet community standards.

> Mail Ludamovic Gail Sredanovic



Stanford University CP/GUP Project EIR

STUDY

RAREONS
HARLAND BARTHOLOMEW
4. ASSOCIATER, INC.
Figure 4.4-6

240 Fernando Avenue Palo Alto, CA 94306 August 7, 2000

Ms. Sarah Jones Santa Clara County Planning Department 70 W. Hedding Street, 7th Floor San Jose, CA 95110

In Re: DEIR GUP/CP for Stanford University

Dear Ms. Jones,

Overall, the Draft Environmental Impact Report (DEIR) for the Stanford University Community Plan (CP) and General Use Permit (GUP) appears to be well researched and thought out. However, there are two issues that arose while I reviewed the DEIR that believe should be further investigated before the release of the final EIR. I stated these concerns during the public hearing of the Santa Clara County Planning Commission on August 3, 2000, and provide these written comments to further document these concerns.

100 -1 1) Increased potential for land use conflicts

In Chapter 4.1, the DEIR reaches the conclusion that there is "no increased potential for conflict as a result of incompatible land uses." In discussing this evaluation criterion as it relates to the area referred to the Lathrop Development District (LDD), on Page 4.1-18 -19, the DEIR states:

"While the GUP only proposes 20,000 square feet of additional development, the CP designation would allow consideration of future development that is consistent with the Academic Campus designation. [Sentence skipped.] Additional academic development in this development district would have the potential to conflict with natural resources protection and open space uses that are afforded in the surrounding area. [Sentence skipped.] However, it is anticipated that these uses *could* [italics added] be provided in the development district without conflicting with the adjacent non-Stanford Land uses because of existing buffers, including portions of the golf course, San Francisquito Creek and Alpine Road."

I see at least two problems with this analysis. First, in one of the sentences skipped, the DEIR discusses the possibility that future development in the LDD could result in the relocation of the golf course. Obviously, the buffer value of the golf course vanishes if and when the golf course does.

More troubling to me is the fact that the golf course, San Francisquito Creek and Alpine Road very clearly do *not* buffer the natural resources and open space uses in the surrounding area, despite what is implied by the quoted section. These features provide a buffer to the areas to the west of the LDD, which are developed residential areas, but afford no buffer to the natural resources and open space uses, which are primarily to the west and southwest of the LDD, as can be seen in Figure 2-6.

It is worth noting that the portion of LDD closest to the proposed Special Conservation area is where the existing road system in the LDD occurs. It seems reasonable to suppose that this area also contains other infrastructure such as sewer and water lines, as well. Given that "it is reasonably foreseeable that the change in [land use] designation [for the LDD] has been requested to allow for a greater degree of future development in that area" (DEIR, page 4.2-27), it is likewise reasonable to assume that much of this development will take place along this border region.

From looking at the proposed Academic Growth Boundary (AGB) around the LDD in Figure 2.6 and my own knowledge of the area, the AGB does not appear to correspond to any discernable natural or man-made barrier or border. Given these facts, it seems to me that there is a significantly increased potential for conflicts due to incompatible land uses in this area if the proposed redesignation from Academic Reserve and Open Space to Academic Campus is approved. This may not be dramatically evident during the period that the GUP is operative, but the CP is supposed to be a long-term planning instrument, as stated on page 2-5. Land use conflicts in this area is "reasonably foreseeable" and, in my opinion, virtually inevitable if this redesignation occurs.

100 -2 2) Standards of population density and building intensity

As stated on page 2-5, "the CP...is intended to be adopted by the County as part of its General Plan". As a part of the County's General Plan, the CP should meet state standards of sufficiency required of General Plans. California Government Code 65302 states in part:

The general plan shall consist of a statement of development policies and shall include a diagram or diagrams and text setting forth objectives, principles, standards, and plan proposals. The plan shall include the following elements: (a) A land use element which designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land. The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan.

Definitions for Campus Residential-Low Density and Campus Residential-Moderate Density are provided on Page 2-8 (1-8 du/ac and 8-15 du/ac, respectively), but no equivalent definitions are provided for the Academic Campus land use designation. Instead, as stated on Page 2-6, "Allowable uses should be developed to appropriate intensity and density as established through the General Use Permit".

- A lack of definition pertains to the proposed Open Space and Academic Reserve land use designation on Page 2-8. "Limited low intensity academic use ...may be allowed at intensities and densities established by a use permit granted by the County". What might constitute "limited low intensity" is left undefined.
- Leaving the allowable intensity and density of these two land use designations proposed in the CP, which constitute the great majority of Stanford lands under County jurisdiction, to use permits with limited lifetimes seems contrary to both state law and good planning. Use permit

planning provides no guidelines for the university and the community as to what level of development can be anticipated in the medium term, after the anticipated end of the proposed GUP.

Thank you for the opportunity to comment.

Regards,

Jeffrey Segall

DEPARTMENT OF FISH AND GAME

POST OFFICE BOX 47 YOUNTVILLE, CALIFORNIA 94599 (707) 944-5500



August 7, 2000

Ms. Sarah Jones County of Santa Clara Planning Office 70 West Hedding Street, East Wing 7th Floor San Jose, California 95110 Via Fax (408) 288-9198

Dear Ms. Jones:

Stanford University Draft Community Plan and General use Permit Application Draft Environmental Impact Report Santa Clara County (SCH Number 1999112107)

Department of Fish and Game personnel have reviewed the Draft Environmental Impact Report (DEIR) for the above-mentioned Community Plan (CP). The intent of the CP is to establish policies and land use designations on 4,017 acres of Stanford University land located in unincorporated Santa Clara County. As described in the DEIR, the location of this acreage includes Stanford University lands south of El Camino Real between Sand Hill Road/Alpine Road and Page Mill Road/Hillview Avenue. It also includes campus acreage north of Junipero Serra Boulevard (JSB) and foothill acreage south of JSB.

- In Section 2, Description of Proposed Project, Figure 2-3 depicts the 4,017 acres the CP includes. However, the DEIR text does not adequately describe the acreage boundary west of Highway 280. The CP should include a complete description of the location of the entire acreage included in the CP regardless of whether any development potentials are proposed in the CP.
- In Section 4.1, Land Use (page 4.1-18), the DEIR states that the proposed CP designation for the Lathrop Development District is Academic Campus which is a change from the Existing land use designation of Academic Reserve and Open Space. While the CP only addresses the potential for 20,000 acres to be developed, the potential for future development in this area south of JSB is significant if the land use designation is changed. Any further development, either by campus expansion or road construction has significant impacts, including, but not limited to, habitat fragmentation and increased edge effects. The Department considers these significant impacts from encroachment into open space unacceptable and potentially unmitigatable. The Department

recommends adopting alternative Academic Growth Boundary B (AGB-B) that would allow existing development to remain south of JSB, but would require the 20,000 square feet of development proposed in Lathrop to be relocated north of JSB.

- 101 -3 In Section 4.3, Population and Housing (page 4.2-17) the DEIR states "Housing demand is not a physical environmental change covered by CEQA per se." Typically, the Department does not comment on this either. However, the demand for housing and perceived necessity to build it, has the potential to significantly impact sensitive species resources, for which the Department has concerns. In Table 2-1 (Page 2-13) the potential for housing buildout is presented. The range of density of buildout in some of the smaller parcels spans from 1 unit per 1.5 acres to 8 units per 1.5 acres. In several sections of the CP, the demand for campus housing is described. Given this demand and the proposed placement of some housing in sensitive resource areas, the Department strongly recommends the maximum density buildout of those areas in the currently proposed East Campus, San Juan, and Quarry development areas. Furthermore, the Department strongly recommends eliminating the proposed housing at the Lower Knoll (Map Code J) and Gerona Triangle (Map Code L), and eliminate or significantly reduce proposed housing at the Driving Range (Map Code F). In addition, the Department supports the adoption of Alternative HOUS-A which links housing development to academic development.
- In Section 4.8, Biological Resources, the DEIR describes documented presence of California tiger Salamander (CTS) at Lake Lagunita, the Lower Knoll, and Gerona Triangle, all in the currently proposed Lagunita development area, the stable site in the currently proposed West Campus development area, and the Foothills site currently proposed Lathrop development area. Coincidently, all of these sites are located in the CTS Management Zone, established and defined in the June 1998 Management Agreement for the California Tiger Salamander at Stanford University signed by representatives of the County, U. S. Fish and Wildlife Service, Stanford University, and the Department.
- 101-5 In Section 4.8.C, Impacts and Mitigation Measures, (Pages 4.8-28 to 32) BIO-1(a) through (e) Option 1: CTS Mitigation Program Proposed by Stanford is described. The Department considers this mitigation program unacceptable for all of the reasons detailed in the Department's letter to Mr. Hugh Graham of

the County, dated June 20, 2000. In summary, this mitigation program fails to secure mitigation acreage in perpetuity and proposes to change the established Management Zone without the consensus of the other signatories to the Management Agreement, which was a County condition of approval for the Architectural and Site Approval for the Governor's Corner Housing project. Given the impermanent and transitory approach to CTS mitigation, the Department recommends against this mitigation alternative.

- 101-6 Furthermore, the Department recommends adoption of the BIO-1(a) through (e) Option 2: CTS Mitigation Program [(not proposed by the project applicant) (Pages 4.8-32 to 33)] with the following modifications:
 - 1) According to recent research (Trenham, 2000) CTS first breed at about four to six years of age. Therefore, due to this delayed breeding behavior, successful reproduction of CTS should be documented for longer than three years because individuals just recruited into the population may not breed for six years. The Department recommends a minimum of ten years of monitoring with at least seven of those years having documented successful breeding and recruitment into the population.
 - 2) The DEIR states (page 4.8-33) that `...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." The Department recommends against any development of these sites. Permanent mitigation conservation easements should be established for Lake Lagunita and surrounding undeveloped land in the CTS Management Zone. The undeveloped upland habitat north of JSB in the CTS Management Zone has significant CTS resources that should be included in a permanent conservation easement and not be developed.
- 101-7 In addition, the Impacts and Mitigation Measures section discusses mitigation measures BIO-1(f) through (k): Rare, Threatened, and Endangered Plant Protection Program. The Plant Protection Program is not adequate. The plan provides no protection for special-status plants once construction is finished, and relies exclusively on transplantation where total avoidance is not feasible. There are several problem with this approach. They are as follows:

- 1) Focused surveys for special-status plants are not acceptable. Full floristic surveys as described in the Departments's <u>Guidelines for Assessing the Effects of Proposed Developments on Rare and Endangered Plants and Plant Communities</u> (enclosed for your information) should be required prior to any project-level siting of new development within undisturbed areas.
- 2) A special-status exclusionary buffer of 30 feet is insufficient. Typically, buffers are established on a case-by-case basis depending on the species impacted. However, the minimum buffer accepted by the Department is 100 feet.
- The Department considers transplantation an experimental method of plant establishment. The Department prefers translocation (collection of seed and cuttings for broadcast and/or propagation) over transplantation. However, the Department has also found that translocation is only successful in eight percent of the projects in which it is employed. Therefore, five year monitoring for translocation success is not acceptable because it is insufficient time to determine whether or not the translocation was successful. Regardless of time, continuing implementation of translocation methods and monitoring should occur until the success criteria are met.
- 4) The CP proposes a 2:1 replacement ratio for impacts to special status plant habitat. Replacement ratios for special status plant habitat relate more to the rarity of the species and potential for success in translocating plants. Therefore, replacement ratios should be discussed on a case-by-case basis in subsequent project-level CEQA documents.
- There is no discussion on securing special-status plant habitat mitigation acreage in a permanent conservation easement. The Department considers translocation of sensitive plant species experimental. To assure that sensitive plant species are fully mitigated, we recommend that, in addition to translocation, known existing plant populations be protected and managed appropriately to assure that impacts are reduced to less than significant levels. Any mitigation acreage should be subject to a permanent easement.

The Department recommends that these issues be addressed and included in the DEIR prior to certification.

101-8

The same section describes <u>BIO-5</u>: <u>Replacement of Oak</u>

<u>Woodland and Riparian Oak Woodland</u>. A mitigation ratio of 1.5:5
is unacceptable for both habitats. Impacts to riparian
vegetation of any kind are typically mitigated at a 3:1 ratio, to
account for the physical, as well as temporal, loss of plants and
stream habitat. Oak woodland mitigation includes both a 3:1
ratio of protection for established oak woodland habitat and a
1:1 ratio for replanting oak woodland in such a way that the
replanted area will have a success criterial that provides a
similar tree density and species composition of that land which
was impacted. Both the preserved oak woodland and replanted oak
woodland sites would require a permanent conservation easement.
The Department recommends that this be addressed in the DEIR
prior to certification.

In summary, the Department recommends adopting AGB-B, eliminating housing in some areas of the CTS Management Zone, addressing the above-mentioned mitigation issues for various species and habitats, including permanent conservation easements for mitigation acreage prior to certification of the DEIR for the CP.

The Department appreciates the County's close coordination with the Department on this plan. If you have any questions, please call Ms. Margaret Roper, Fishery Biologist at (408) 842-8917; or Mr. Carl Wilcox, Habitat Conservation Manager, at (707) 944-5525.

Sincerely,

Robert W. Floerke Regional Manager Central Coast Region

Enclosure

cc: See next page

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State of California THE RESOURCES AGENCY Department of Fish and Game May 4, 1984 Revised August 15, 1997

GUIDELINES FOR ASSESSING THE EFFECTS OF PROPOSED DEVELOPMENTS ON RARE, THREATENED, AND ENDANGERED PLANTS AND PLANT COMMUNITIES

The following recommendations are intended to help those who prepare and review environmental documents determine when a botanical survey is needed, who should be considered qualified to conduct such surveys, how field surveys should be conducted, and what information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys that are conducted to determine the environmental effects of a proposed development should be directed to all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare plant communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened; or endangered species. The most current version of the California Natural Diversity Data Base's Outline of Terrestrial Communities in California may be used as a guide to the names and status of communities.

- 2. It is appropriate to conduct a botanical field survey to determine if, or the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:
 - a. Based on an initial biological assessment, natural vegetation occurs on the site and it is unknown if rare, threatened, or endangered plants or habitats occur on the site; or
 - b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.
- 3. Botanical consultants should possess the following qualifications:
 - Experience conducting floristic field surveys;
 - b. Knowledge of plant taxonomy and plant ecology;
 - c. Familiarity with the plants of the area, including rare, threatened, and endangered species; and
 - d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting.
- 4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:
 - a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

Additionally, field surveys should be conducted with sufficient number of visits spaced throughout the growing season to accomplish a floristic survey of the site (see 4.b.).

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

- b. Floristic in nature. A complete species list should be included in every botanical survey report.
- c. Conducted in a manner that is consistent with conservation ethics. Collections of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species (voucher specimens) should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Plant Conservation Program of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
- d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.
- e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7½ minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Data Base.
- 5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, EIR's, and EIS's, and should contain the following information:
 - a. Project description, including a detailed map of the project location and study area.
 - A written description of biological setting referencing the community nomenclature used and a vegetation map.
 - c. Detailed description of survey methodology.
 - d. Dates of field surveys and total person-hours spent on field surveys.
 - e. Results of field survey (including detailed maps).
 - f. An assessment of potential impacts.
 - g. Discussion of the importance of rare, threatened, or endangered plant populations with consideration of nearby populations and total species distribution.
 - h. Recommended measures to avoid impacts.
 - i. List of all species occurring on the project site.
 - Description of reference site(s) visited and phenological development of rare or endangered plant(s).
 - Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
 - Name of field investigator(s).
 - m. References cited, persons contacted, herbaria visited, and disposition of voucher specimens.



August 7, 2000

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Our File No. 04678-163

VIA FACSIMILE AND U.S. MAIL

Ms. Sarah Jones Associate Planner Santa Clara County Planning Office 70 West Hedding Street, 7th Floor San Jose, California 95110

Comments On Draft EIR for Stanford University's Draft Community Plan and General Use Permit Application

Dear Ms. Jones:

These comments are submitted on behalf of Stanford University pursuant to the California Environmental Quality Act. Stanford appreciates the opportunity to comment on the Draft EIR, as well as the obviously large amount of time and effort spent by the County staff and its consultants preparing a comprehensive environmental analysis of the impacts of Stanford's proposed academic and housing projects.

As is inevitably the case, these comments focus on portions of the EIR that Stanford seeks to modify. It is important to note that Stanford has no dispute with the majority of the analysis in the EIR.

Stanford's comments, in the order that the relevant topics appear in the EIR, are as follow:

102 -1 I. Chapter 3 — Plan Consistency

Stanford disagrees with the EIR's conclusion that approval of the proposed Community Plan and General Use Permit would be inconsistent with the Santa Clara County Trails Master Plan. As stated in the EIR, Stanford's proposed Community Plan identifies the two route alignments shown in the County Trails Master Plan. Both trail alignments are located in the foothills district, one near Matadero Creek and the other near San Francisquito

Creek. No development is proposed near these routes. Therefore, approval of the Community Plan and build-out of the projects authorized by the GUP will not interfere with future implementation of the County's Trails Master Plan. Furthermore, the proposed Community Plan carries out the trails plan by requiring Stanford to work with local agencies to define more precise trail alignments for the portions of the trails crossing Stanford lands.

The EIR appears to conclude, nevertheless, that to achieve consistency with the Countywide Trails Master Plan, Stanford also must dedicate the two trails crossing Stanford's lands. This conclusion is in error. The Countywide Trails Master Plan provides:

Development projects proposed on lands that include a trail as shown on the Countywide Trails Master Plan Map may be required to dedicate/and or improve such trail to the extent there is a nexus between the impacts of the proposed development and the dedication/improvement requirement. The dedication/improvement requirement shall be roughly proportional to the impacts of the proposed development. (Policy PR – TS 3.7) (emphasis added)

It is clear from the Plan's language that dedication and/or improvement of trails is not necessary in order to achieve consistency with this policy: the policy states that the County may require dedication in appropriate cases. If the County chooses not to require dedication and/or improvement of the trails crossing Stanford's land as a condition of approval of the Community Plan and/or General Use Permit, the County's decision would not be inconsistent with the Plan.

In this case, dedication of the trails is not warranted. No development is proposed on land that includes the trails shown in the Trails Master Plan. Further, there is not an essential nexus between the proposed dedication condition and the project's impacts. Nor is the dedication requirement roughly proportional to the project's impacts. As shown in Table 4.2-1 of the Draft EIR, Stanford provides numerous recreational and athletic resources to the campus community and to the general public. These facilities have sufficient capacity to accommodate the increased demand for recreational opportunities created by the increase in campus residential population, as well as the increase in the faculty, staff and student population. Existing and proposed campus open space and recreational areas also have sufficient capacity to accommodate any increase in demand for such resources caused by the proposed infill development of vacant parcels in the faculty subdivision. As the EIR explains, under the Community Plan's proposed land use designations, Stanford would continue to maintain campus parks and open space at a rate far exceeding the maximum requirement of 5 acres for 1,000 population.

Stanford remains committed to working with the County and other local agencies to study alignments of the trails crossing Stanford's lands that are shown on the Countywide Trails Master Plan. The goal of these studies would be to arrive at an alignment that would protect sensitive habitat areas, as well as on-going academic, agricultural, and residential uses. However, Stanford opposes a requirement that it dedicate these trails at this time.

II. Chapter 4 — Environmental Analysis

A. Open Space, Recreation and Visual Resources

102 -2

Open Space Resources. The proposed Community Plan and General Use Permit will preserve the majority of Stanford's land as open space. No development is proposed in the undeveloped portion of the foothills. Furthermore, the Community Plan proposes a new campus open space designation that would apply to the Arboretum, Palm Drive, the Oval, the Stable area (the Red Barn, Stable, Little Stable and Covered Riding Ring), Lagunita reservoir and the surrounding area, and several open areas within the faculty subdivision.

Only a very small amount (20,000 square feet) of additional development is anticipated near the golf course and Center for the Advanced Study for the Behavioral Sciences in the Lathrop District. Eighty-five percent of this area is developed now. Of the additional anticipated development, at least 5,000 square feet may be used to construct an addition to the golf course club house. Stanford does not have any plans for the rest of the 20,000 square feet, but has requested that the EIR study construction of this amount in the event that other small educational, utility or groundskeeping structures are needed in the future.

The EIR recognizes that construction of 20,000 square feet of academic development in the Lathrop district would not affect any formal or informal trails, and would not limit or prohibit the use of an open space resource. The EIR also recognizes that this amount of development would be very low intensity. The EIR states, however, that the distribution of development throughout the Lathrop District could affect the character of the area if new buildings were widely scattered, leading to a need for new roads and fragmentation of the existing golf course. To reduce the likelihood of this occurring, the EIR proposes that the 20,000 square feet of development be clustered adjacent to existing development (golf course club house or Center for Advanced Study of Behavioral Sciences).

102 -3

While Stanford agrees that clustering can be an effective planning tool, Stanford asks that the applicable condition be worded to encourage clustering rather than to require clustering in all cases. Clustering would be appropriate for development such as expansion of the golf course club house. However, Stanford may ask to build other types of

structures in this area, such as field research stations or other academic facilities needing a remote setting, that would not be amenable to clustering and would not significantly change the character of the area. The condition should be flexible enough to allow the County to decide on a case-by-case basis whether clustering should be required.

102 -4

The EIR also concludes that the proposed Community Plan's "Academic Campus" land use designation would allow for greater future development of the Lathrop District in subsequent development proposals. This is not necessarily correct. Stanford agrees that the General Use Permit should limit development in the Lathrop District to no more than 20,000 square feet. A new or revised use permit would then be needed in order to construct any further projects in this area. The County would retain the discretion to determine how much additional development would be appropriate.

102 -5

The County need not reduce the size of the Lathrop District or exclude the golf course from the Academic Campus land use designation or the academic growth area. The proposed Community Plan designates the Lathrop District, including the golf course, "Academic Campus" because, from a planning perspective, the existing land uses in this area better fit within an "Academic Campus" land use designation than an open space designation. The golf course is an athletic field. All campus athletic fields were included in the "Academic Campus" land use designation. The research facilities in this area also are designated "Academic Campus" because they are used for academic purposes. For the same reasons, Stanford placed this area within the proposed academic growth boundary. Stanford requests that any land use designation in this area recognize the continued use of the existing research facilities and the golf course, as well as allow a limited amount of additional construction consistent with those existing uses.

102 -6

Recreation Resources. As explained in the above comments on plan consistency, dedication of trails is not necessary to accommodate the demand for recreational facilities caused by the projected increase in the campus population. The existing campus open space and recreational facilities have sufficient capacity to accommodate the projected population increase. Furthermore, Stanford's conservation and access plan for the dish area is not part of this project. Also please note that while the EIR states that Stanford would continue to "dedicate" parks in the faculty subdivision, Stanford understands that the intent of this mitigation measure is that Stanford would designate such parks and would continue to maintain them as parks.

B. Population and Housing

102 -7

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. Due to the current housing shortage in the campus vicinity, Stanford intends to build all of its proposed housing and asks that the County approve all of the

102 -8

proposed housing sites. It is imperative that as many sites as possible remain available for housing construction.

Stanford does not agree, however, that CEQA enables the County to require Stanford to build 100% of its proposed housing in order to construct all of the proposed academic development. Even if increased housing demand were considered to be an environmental effect, the EIR's proposed mitigation measure would be overbroad. According to the calculations presented in the EIR, the projected increase in graduate students would create a need for 683 housing units, the increase in postgraduates and hospital residents would create a need for 374 housing units, and the projected increase in faculty and staff would create a need for 640 housing units. The total number of housing units needed to accommodate the projected increase in campus population would be 1,697 units. Therefore, if the County concludes that housing demand created by the project should be mitigated, the mitigation measure should be modified to require Stanford to phase construction of 1,697 of the proposed housing units prior to completion of the proposed 2,035,000 square feet of academic development, not 100% of the proposed units. Stanford has numerous incentives for building the remaining housing units that it has proposed, but it should not be required to do so as mitigation under CEQA.

In addition, Stanford should not be held accountable for what it cannot control. Stanford cannot guarantee that the maximum amount of the proposed housing will be approved by the County, or other relevant agencies. Setbacks for visual purposes, internal roadways and driveways, drainage swales and stormwater retention basins, groundwater recharge facilities and other site requirements may reduce the number of approved and/or feasible housing units on a given site. Stanford's application thus proposes density ranges rather than a specific number of units on each site.

It is also possible that the local economy will take a prolonged turn for the worse, and housing demand will substantially decrease in the future. Should that happen, and should vacancy rates in the local area demonstrate that there is a sufficient housing supply, Stanford should not be required to build more housing. It is not in the County's or the cities' interests to require construction of housing if housing is no longer needed.

C. Traffic and Circulation

1. Intersections

The Draft EIR studies traffic effects of the projected population increases during build-out of the GUP and has developed an innovative approach to traffic mitigation. Stanford supports the EIR's approach and conclusions.

The mitigation approach proposed by the EIR encourages Stanford to expand its successful TDM programs. While the EIR correctly recognizes that the County cannot

require Stanford to implement TDM measures, it provides a method of encouraging TDM programs on campus and in the surrounding community as an alternative to intersection improvements, as well as a method of monitoring TDM success. Stanford, like the County, prefers to concentrate its efforts on expansion of its TDM program over construction of intersection improvements. Stanford has been a leader in implementing TDM programs and is dedicated to continuing and expanding these efforts.

102 -9

The EIR identifies intersection improvements that could be undertaken to reduce congestion in the event Stanford is not fully successful in meeting a "no net new commute trips" standard, If monitoring shows that Stanford has not met the trip reduction goal for a specified period of time, and monitoring shows that the relevant intersections have reached unacceptable levels of service, 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 CP/GUP development would need to be computed based on the percentage that those net 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 programs are at least partially successful in preventing new trips. Stanford also should not be required to contribute additional funds for intersection improvements that Stanford or others already have funded, or for intersection improvements that are alternatives to improvements that Stanford already has funded or irrevocably offered to fund (e.g., the Sand Hill Road improvements).

2. Residential Streets

102 - 10

The EIR recognizes that there is no data showing a relationship between Stanford traffic and cut-through traffic on residential streets in Palo Alto and Menlo Park. The EIR also recognizes that if the policy of no net new commute trips is realized, no increase in peak hour cut-through traffic in residential areas should occur. Accordingly, 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. 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 upon staff review of a proposal presented by a neighborhood group or city, and if the study is directed by the County or the City in which the neighborhood is located. In the event that a study is conducted, cut-through traffic should only be deemed significant and worthy of mitigation if the increase in net new traffic attributed to CP/GUP build-out would "cause a substantial change in the character and/or safety of the residential street environment" as measured by overall traffic volumes and percentage change in traffic. (This standard is taken from the Sand Hill Road EIR.) At the conclusion of the neighborhood traffic study, if this standard has been met, then the agency overseeing the study (e.g. Palo Alto or Menlo Park) should be required to submit its study to the County Planning Office for independent verification of the study's results and for the

County's assessment of Stanford's fair share contribution to recommended mitigation measures.

The EIR also concludes that construction of new housing on Stanford Avenue could impact circulation in and near the College Terrace neighborhood. The EIR therefore requires preparation of a site-specific traffic study for the Stanford Avenue housing project. Consistent with the impact identified in the EIR, that study (and any other site-specific studies required by the County) 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 commute trip monitoring program, the prescribed intersection modifications, and the cutthrough traffic mitigation requirements outlined above.

3. Parking

Stanford's policy is to manage trips by charging for parking and by offering convenient alternatives to driving. Due to the variety of activities and events on campus, Stanford occasionally needs more parking spaces than required for day-to-day operations. For this reason, Stanford does not limit parking supply to manage traffic demand. Furthermore, providing a sufficient number of parking spaces for events prevents parking spillover onto neighboring streets and private parking lots. This is directly addressed in the Draft EIR under TR-3.

Traditionally, special event parking at Stanford has occurred in parts of the Arboretum and other undeveloped areas of the campus. These areas are being reduced due to infill development and concerns over the health of the trees and landscape. Therefore, Stanford is shifting more and more of its event parking from informal, unmarked and uncounted parking areas to formal parking lots.

The Draft EIR's calculation of a parking space/population ratio on page 4.4-84 is overly simplistic. Because Stanford will be adding a substantial amount of housing, the parking ratio will need to increase. Housing requires more parking spaces than other academic uses, because residents need a place to store their cars whether or not they use them to commute. It is more appropriate to calculate the non-resident parking space/population ratio. The existing ratio is 0.52 spaces per person. Applying this ratio to the population increase of 2,201 persons yields a gross 2,010 parking demand of 1145 non-resident spaces. However, this amount needs to be reduced to account for former off-campus residents moving onto campus to live in the new housing. This is done in the DEIR (Table 4.4-26, footnote 7) which shows the reduction of 669 commuter parking spaces. This leaves a balance of 476 new non-residential parking spaces to support day-to-day campus operations.

Stanford has proposed an additional 547 parking spaces to support the proposed Performing Arts Center. Stanford has calculated the total parking demand for the Performing Arts Center as 933 spaces (2,800 seats at 3 persons per car). Existing parking between Palm Drive and Frost Amphitheater would be used to provide 386 of these spaces, leaving a balance of 547 spaces. When there are no events at the Performing Arts Center these 547 spaces would be available for other uses. However, they would be part of the Stanford parking system that requires weekday users to purchase a permit.

4. Construction Traffic

Stanford requests the following modifications to the mitigation measures for construction-related traffic:

TR-7B: Maintenance of Pedestrian Access/TR-7C: Maintenance of Bicycle
Access

Stanford should be able to limit pedestrian and bicycle access in areas within its own campus. Any closures of public paths at the perimeter of the campus should be reviewed by the County Planning office. Covered walkways will not always be feasible or necessary at all sites (e.g., covered walkways would not be needed for ground level construction or projects where the structure would be built far from the construction fence and sidewalk).

TR-7D: Restriction on Construction Hours

Stanford can limit construction deliveries during the specified hours, however, limitations on workers arriving or departing the construction sites between 4:30 and 6:00 p.m. may not be feasible in all cases. This measure should be modified to require such limitations only where feasible.

TR-7F: Protection of Public Roadways During Construction

The main construction access routes to the Stanford campus will be Page Mill Road and El Camino Real. These are traffic routes used by thousands of vehicles each day. Many construction vehicles and large trucks unrelated to Stanford use these roads. Before and after surveys will not demonstrate whether Stanford-related construction vehicles caused damage to the roadways that may occur during the construction period. Instead, this measure should apply only to streets used for immediate access, within one or two blocks of campus construction sites.

D. Biological Resources

The Draft EIR identifies potentially significant impacts to the California tiger salamander, a species that Stanford's biologists have been studying for many years. The CTS was first observed to breed in the Lagunita reservoir in 1941. From 1991 to the present, Stanford biologists at the Center for Conservation Biology have intensively studied the CTS in order to provide information necessary for conservation planning.

In 1998, Stanford University, Santa Clara County, the California Department of Fish and Game, and the United States Fish and Wildlife Service entered into a Management Agreement for the California Tiger Salamander at Stanford University. The results of Stanford's research on the CTS are summarized in the Management Agreement.

Consistent with the Agreement, Stanford has taken several steps to actively manage its resources for the benefit of the CTS:

- Of primary importance, Stanford manages water levels and water quality at Lagunita reservoir to provide optimum conditions for the CTS. Stanford also has voluntarily suspended the annual bonfire at Lagunita reservoir.
- Stanford has constructed and is managing several new research ponds in the foothills. Ponds for CTS breeding in the foothills may reduce the need for the salamanders to cross roads to reach Lagunita reservoir, which could reduce CTS mortality as well as increase the overall population of CTS. Before entering into the CTS Management Agreement, biologists at Stanford's Center for Conservation Biology had directed construction of one research pond in the foothills. Through the Management Agreement, the University committed to construct two more ponds. Subsequently, the University chose to construct a total of five ponds (two ponds beyond the required three).
- Stanford's biologists regularly check utility structures to ensure that they have been retrofitted and maintained in a manner that prevents CTS from entering and being trapped. Curbs and gutters have been designed to ensure that CTS continue to have access to Lagunita reservoir. Weed control is limited and performed in a manner designed to be least harmful to the CTS. In addition, Stanford does not conduct rodent control in open areas so that burrows and underground retreats used by the CTS will continue to be present.

102-14 (cont.)

Stanford's biologists are actively working to decrease mortality for CTS
crossing JSB and Campus Drive West. Stanford installed a system of drift
fences along important crossing areas to reduce traffic mortality. As part
of salamander monitoring on rainy nights, Stanford biologists provide safe
passage for salamanders across these roads. Stanford also will build an
experimental tunnel under JSB.

Stanford has demonstrated its commitment to the long-term preservation of the CTS population at Stanford and will continue to do so in the future.

The housing proposed in the CTS Management Area would not conflict with the strategies outlined in the CTS Management Agreement. The Management Agreement specifies that it is not intended to preclude future activities within the CTS Management Zone that are beyond the scope of the Agreement. However, for activities within the CTS Management Zone that are beyond the scope of the Agreement, additional mitigation measures may be required in the approval process to mitigate the impacts of those activities. The proposed housing projects in the CTS Management Zone are beyond the scope of the Agreement, and therefore additional mitigation is appropriate.

The mitigation measures that the County requires should be the same type of measures as were determined to be appropriate by the County, USFWS and CDFG for mitigation of similar types of impacts when the agencies entered into the CTS Management Agreement. Regulatory and physical conditions have not changed since the Agreement was executed. On the regulatory side, the CTS remains a federal candidate for listing, but the public review and comment process regarding listing eligibility has not commenced and no determination has been made as to whether the CTS will be listed as threatened or endangered. Physically, Stanford has implemented the management strategies in the Agreement, which are designed to improve conditions for the CTS population at Stanford. Stanford continues to actively engage in research and conservation efforts to benefit the CTS.

The following mitigation measures, therefore, would be appropriate and would mitigate the impacts to a less than significant level:

1. Driving Range Housing

As the EIR demonstrates, development of the housing proposed at the Driving Range site will not result in a loss of CTS habitat because the Driving Range is not suitable for CTS use. Therefore, implementation of mitigation measures BIO 1(b)-(e) requiring construction precautions, drift fences, utility box design, and landscape elements to direct salamanders away from building, roadway and parking areas, will sufficiently minimize the potential for impacts to CTS at this site.

102-14 (cont.)

2. Stable Site Housing

Development of the housing proposed at the Stable site will involve construction on land that is within the CTS Management Zone, but that does not provide good CTS habitat. As the habit assessment previously submitted by Thomas Reid Associates demonstrates, CTS access from the Stable site to the breeding area at Lagunita reservoir is severely limited due to the existing tennis courts, golf course, and Governors Corner housing and parking lots. The Management Agreement similarly explains that prior to development of the adjacent Governors Corner housing and parking lots, the CTS population at that site was threatened due to the presence of busy roadways and other inhospitable habitat located between it and Lagunita reservoir. The Stable site is even more distant from Lagunita reservoir than the Governor's Corner housing and parking lots.

Impacts to the CTS from development of the housing proposed at the Stable site can be mitigated by the same types of measures as were specified in the CTS Management Agreement for development of the Governors Corner housing project. The mitigation measures in BIO 1(b)-(e) are similar to the measures required to mitigate the housing and parking lot construction at Governors Corner. These measures will minimize the risk of loss of individual salamanders. In addition, Stanford has proposed that the Management Zone be expanded by an amount of acreage equal to the Stable site acreage, and that the expanded acreage be managed for the benefit of the CTS.

Mitigation measure BIO-1(a) (Option 2) would require Stanford to provide long-term protection and management, through easements or another equally protective mechanism, of an amount of land equal to three times the acreage of the CTS habitat that would be lost at the Stable site. Stanford objects to this measure to the extent that it would require dedication of an easement, and Stanford also objects to preservation of land at a 3:1 ratio to mitigate impacts at the Stable site.

Dedication of an easement was not required in the CTS Management Agreement of the Governor's Corner project and is not warranted for mitigation of the Stable site housing development. In many cases, a public agency will ask a developer to convey an easement because the developer plans to sell the land to various owners and would not retain responsibility for management of the habitat and compliance with mitigation measures in the long-term. That is not the case with Stanford. Stanford will not sell the land to someone else. Further, Stanford will continue to manage the habitat area and will report on mitigation compliance. The County will be able to continue to regulate Stanford's use of the land through conditions on the GUP, Community Plan provisions, and other land use regulations. There is no need for an easement.

102-14 (cont.)

The County also should not require dedication of an easement because the EIR does not demonstrate that such a requirement, together with the other CTS mitigation measures, is roughly proportional to the impact to the CTS population from development of the housing proposed at the Stable site. To pass constitutional muster, a dedication requirement must be related both in nature and extent to the impact of the proposed development. An agency must quantify its findings in support of the dedication requirement beyond merely conclusory statements that it will mitigate or offset some anticipated burden created by the project. In this case, loss of potential low quality CTS habitat at the Stable site does not justify imposition of an easement at a 3:1 ratio or at any ratio. As demonstrated by the findings that the County made when it approved the Governor's Corner housing and parking lot project, the impact from loss of poor quality habitat can be mitigated to a less than significant level by active management of land for the benefit of the CTS, and by site planning and construction measures designed to minimize impacts to the CTS population in this area.

3. Lower Knoll Housing

Development of the housing proposed at the Lower Knoll would involve construction on land that is within the CTS Management Zone and, in contrast to the Driving Range and the Stable sites, provides good quality CTS habitat. Thus, in addition to mitigation measures BIO-1(b) through (e), which would minimize impacts to the CTS population from construction and use of the site, Stanford has proposed to expand the area subject to the requirements of the Management Agreement by three times the acreage of this site and that Stanford would create new CTS breeding ponds in the foothills. The combination of new breeding ponds and expansion of the area managed for the benefit of the CTS would offset the loss of habitat at the Lower Knoll.

Mitigation Measure BIO-1(a)(Option 2) would require Stanford to provide for the long-term protection and management, through easements or another equally protective mechanism, of an amount of land equal to three times the acreage of the CTS habitat that would be lost at the Lower Knoll, and would also require Stanford to construct and demonstrate success at three new breeding ponds within the foothills area prior to construction of housing at the Lower Knoll. Again, Stanford objects to this measure to the extent that it would require dedication of an easement. The County can regulate Stanford's use of the land in the CTS Management Zone through conditions on the GUP, Community Plan provisions, and other land use regulations. There is no need for the County to require dedication of an easement.

Stanford does not object to the requirement that it construct three new breeding ponds in addition to the ponds Stanford already has constructed in the foothills. Nor does Stanford object to a requirement that it demonstrate success at the breeding ponds in the foothills. Stanford is committed to expanding the CTS population and to creating

102-14 (cont.)

productive breeding sites. In addition to constructing three new ponds in the foothills, Stanford also intends to reconstruct the existing ponds in order to make them successful. Stanford asks, therefore, that the measure be modified so that should Stanford reconstruct the existing ponds in the foothills, in addition to constructing three more ponds, success could be demonstrated at any of the ponds in the foothills, not just the new ponds. Regardless of where new breeding habitat is established, its creation will more than offset impacts from development of upland habitat at the Lower Knoll or elsewhere. Stanford also asks that the County's success criteria take into account an exception for drought years, so that the three-year success requirement need not start anew due to conditions unrelated to pond viability and design.

4. Lathrop District Development

Because the location and type of development that would be constructed in the Lathrop District is not yet known, it is not clear that the development would significantly affect the CTS population. Large portions of the Lathrop District are already developed and would not constitute occupied CTS habitat. Furthermore, part of the Lathrop District is outside of the CTS Management Zone.

To the extent that development occurs on good CTS habitat in the Lathrop District, the measures requiring Stanford to construct new breeding ponds, demonstrate success at the ponds in the foothills (as described above), and implement the measures designed to minimize loss of CTS due to project construction and use, would mitigate impacts from the limited amount of proposed development to a less than significant level.

5. Gerona Triangle Development

Stanford has no plans to construct structures in the Gerona Triangle. Therefore, long-term impacts to the CTS population in this area are not likely to occur. As described in Stanford's application for the General Use Permit, Stanford is evaluating the possibility of relocating a portion of Campus Drive East. Campus Drive East would be moved farther from Lagunita in order to remove an obstacle to CTS migration between the Gerona Triangle grasslands and Lagunita. Stanford is continuing to study this potential project. If it is proposed, impacts to the CTS population would be further evaluated at that time. Stanford anticipates that the overall effect on the CTS population and habitat would be highly beneficial and mitigation would not be required.

E. <u>Historic and Archaeological Resources</u>

As the EIR recognizes, Stanford has demonstrated an exemplary commitment to historical resources preservation and restoration, as well as to archeological resources preservation and study. In 1999, Stanford received the Governor's Award for Excellence in Historic Preservation, and has received many national awards for individual restoration

102-14 (cont.)

projects. Stanford faculty and staff have conducted archaeological digs on campus since the 1920's, and since 1986 have been systematically investigating all of Stanford's lands.

- In light of the demonstrated strength of Stanford's archaeology program, and Stanford's core missions of teaching and research, Stanford asks that Mitigation HA-2b be modified to state that 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. The County should not require private consulting archaeologists to conduct excavations at Stanford, which would take academic opportunities from Stanford faculty, staff and students.
- Stanford also requests that the Mitigation HA-2c be modified to state that once Stanford has notified the County Coroner, no further disturbance of a site containing Native American human skeletal remains may be made except in compliance with all applicable laws regarding Native American burials and artifacts. Stanford agrees that it can be required to notify the County Planning Office that burials/artifacts have been discovered and that the County Coroner has been notified, and to report on compliance with applicable laws; however 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.

F. Public Services and Utilities

The Draft EIR states that fire protection and emergency services at Stanford are provided by the Palo Alto Fire Department. The EIR should recognize that provision of these services, as well as police services, are by a negotiated contract and Stanford pays for all services provided to it. The mitigation measures in the EIR should not require Stanford to pay more than the amount it negotiates as long as service is provided at an adequate level. Further, the EIR should not specify who the service provider will be. At times, Stanford has contracted with Menlo Park rather than Palo Alto for provision of services.

Again, Stanford appreciates the opportunity to comment on the Draft EIR. If you have any questions about these comments or need additional information from Stanford, please contact me, Catherine Palter at the Stanford Planning Office, or any other Stanford representative.

Barbara J. Schussman

Very fruly yours,

STANFORD OPEN SPACE ALLIANCE

P.O. Box 19742 • Stanford, CA 94309 • (650) 223-3333 • www.sos-alliance.org • info@sos-alliance.org

August 7, 2000

Sarah Jones, County Planner Santa Clara County Planning Dept. 70 W. Hedding St., 7th Floor San Jose, CA 95110 Fax: (408) 288-9198

Dear Ms. Jones,

Thank you for the opportunity to comment on the Draft EIR for Stanford's General Use Permit and Community Plan.

As you are aware, the Stanford Open Space Alliance (SOSA) is a network of students, faculty, staff, alumni and neighbors of Stanford University that is dedicated to the permanent protection of the Stanford Foothills southwest of Junipero Serra Blvd. To date, we have collected more than 10,000 signatures in support of our position.

Please consider the following suggestions for inclusion in the Final EIR for Stanford's GUP and Community Plan.

Open Space

103 -1 On January 25, 2000 Supervisor Joe Simitian stated:

"I would specifically ask our EIR consultants and our planning staff to consider the full range of possibilities available to our Board for protecting those 2,000 acres – consistent, of course, with the University's legal rights as a property owner. In addition to the use of an academic growth boundary and/or general plan and zoning designations, I think it would be helpful to consider the potential for open space dedication, the granting of conservation easements, the transfer of development rights, the use of a development agreement, clustered development, or some combination of those tools, to protect the foothills."

These potential tools for protecting the Stanford Foothills should be thoroughly studied in the FEIR.

The FEIR also should study a fourth option for the Academic Growth Boundary (AGB) that would maintain the existing boundary between Stanford's Academic Campus and Academic Reserve and Open Space (see Figure 4.2-1 in the DEIR). This line is roughly the same as Palo Alto's Urban Growth Boundary (UGB) and Urban Services Boundary (USB). A map of Palo Alto's UGB and USB should be included in the FEIR, and an explanation of the differences between these two boundaries should be provided.

Biological Resources

- In addition to the California tiger salamander, the FEIR should study the long-term protection and habitat enhancement of other threatened and special status species on Stanford lands, such as the California red-legged frog, steelhead trout and western pond turtle, as part of the Community Plan.
- The Felt Lake area should be studied as a possible site for habitat restoration and introduction of threatened species and candidates for the Endangered Species Act (ESA), including the red-legged frog, the tiger salamander and the western pond turtle.
- The FEIR should explore prohibiting development within the California Tiger Salamander Management Zone. The FEIR also should include a biological assessment of the golf course, and should consider extending the CTS Management Zone to include the entire golf course.
- Findings in the EIR should be based on independent verification from a qualified biologist. It is against County policy to use verification from Stanford's own faculty/staff.

Maximum Build-Out Plan

- The FEIR should include an analysis of a maximum build-out plan for Stanford University. Stanford's current development strategy appears to be aimed at extending and building out the corners of its academic campus, and then focusing on infill at a later date. Therefore, the FEIR for the Community Plan should define the long-term developable areas of the campus so that Stanford can plan accordingly with higher density on the core campus.
- 103-8 To help determine the extent of Stanford's rights as a property owner, the FEIR should include daytime population figures for both Stanford and Palo Alto.

Reduced Project

The FEIR should study two additional Reduced Project Alternatives. One should consider allowing Stanford to build half of the proposed 3,018 housing units and no academic development. This would meet Stanford's current shortfall in housing (approximately 1,400 units) without adding more people to its daytime population and thus increasing the demand for housing.

The second alternative should study allowing construction of all 3,018 units of housing proposed by Stanford, but only 1 million square feet of academic development.

Housing

- 103-10 The FEIR should study the following options regarding housing:
 - 1) 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, and should include higher-density housing as much as possible.

AND NO. . LONG TELL TOURS

- 2) The FEIR should study the possibility of converting some of Stanford's existing 170 acres of parking lots into multi-story parking structures to free up other parking areas for housing. A map of Stanford's existing parking lots should be included in the FEIR along with an analysis of which sites would be appropriate for parking structures, and which would be appropriate for housing.
- 3) The FEIR should examine restricting all new housing to areas outside of the Tiger Salamander Management Zone.
- 4) There are many under-utilized sites on the Stanford campus that would be appropriate for higher density housing, allowing Stanford to meet its needs for housing while limiting the environmental impacts. The FEIR should study the following potential housing locations on Stanford's core campus:
- a) West Campus District: the portion within the urban growth boundary and consistent with Palo Alto's agreement with Stanford for Special Area B.
- b) DAPER/Administrative District: redevelopment for student housing tied to the area near Escondido Village.
- c) Carnegie Institution Site: 7.5 acres located just east of the Searsville block.
- d) Searsville Block: higher density than the proposed 250 units.
- e) Escondido Village: higher density than that proposed by Stanford.
- f) Wilbur Hall modules: redevelop for higher density.
- 5) The FEIR should consider off campus housing sites, including:
- a) Old Mayfield School site in Palo Alto (near El Camino and Page Mill Road).
- b) The Stanford Research Park. Many sites within the research park are adjacent to single-family neighborhoods and zoned for housing. Stanford policy permits housing to be built there.
- c) El Camino Park in Palo Alto.

- 6) The FEIR should study the impacts of requiring Stanford to make more existing units of housing in Palo Alto's jurisdiction available and affordable to faculty, staff, students and other Stanford-affiliated individuals. Sites that should be studied include:
- a) Stanford West Apartments.
- b) Oak Creek Apartments.
- c) Stanford Senior Housing.

We appreciate you taking these comments into consideration and ensuring that sustainable development is an inherent part of our County's planning process and implementation.

Sincerely,

Peter Drekmeier Executive Director Received 1:06pm

S.C.Co. Hanning Dept.

Aug. 7, 2000

To: Santa Clara County Planning Commission

From: Dianne Dryer 212 Lassen Ave. Mfn. View CA 94043

Re: Stanford University General Use Permit + Plan

Dear Commissioners,

As a 21 year resident of Palo Alto/Mtn. View I urge you to require Stanford to contain it's new development within the current campus area. Do not permit development West of Junipero Serra Blvd. New buildings development only and they can be multi-

storied - rather than sprawling across open space. This would help consolidate traffic also. Stanford should be required to provide shuttle buses in and out of campus.

The stanford footbills should be designated as permanent open space with some public access. Danné Dryer



Tina Minell <minell@aerother m.com>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

cc:

Subject: Stanford construction

08/07/00 12:33 PM

Regarding the General Use Permit, more provision needs to be made to provide open space for nearby residents who will be adversely affected by Stanford's proposed construction, and that that includes those responsible owners of dogs. Do not punish the responsible owners for the sins of the few unresponsible owners. The open land in this valley is shrinking and outdoor activities for dogs are becoming inhibited.

Thank you for your attention. Christina Minell



106 -1

Harold Boyd <hboyd@leland.St anford.EDU>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC:

Subject: Propose change to Stanford Golf Course

08/07/00 12:33 PM

Dear Sarah Jones:

As a member of the Stanford Golf Course and a retired Stanford employee,

my interest in University plans and activities remains strong. On Tuesday, July 25, 2000, a meeting was held at the Golf Course that focused on the need for faculty/student housing and land use. To the former issue, there is no debate; but land use, there is much debate. As an example, Larry Horton's presentation was more of a fait accompli without respect to alternative measures suitable for University housing. Having said that, I would like the City to encourage Stanford to increase the density of it's current and planned housing to accommodate more people on less land. We don't need more sprawl. The University owns hundreds of acres that are closer to the center of campus, not as environmentally and aesthetically sensitive as the golf course, and are better suited to urban development than the Golf Course.

I am confident that your review of this issue will be more protective of an architectural jewel, while making sure that more suitable land is used to accommodate faculty/student housing.

Herb Borock
P. O. Box 632
Palo Alto, CA 94302

August 7, 2000

Ms. Sarah Jones, Associate Planner Santa Clara County Planning Office 70 West Hedding Street, East Wing, 7th Floor San Jose, CA 95110

STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT DRAFT ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE # 1999112107

SANTA CLARA COUNTY FILE # 7165-07-81-99GP-99P-99EIR

Dear Ms. Jones:

This letter provides additional comments on the Draft Environmental Impact Report (DEIR) for the Stanford University Draft Community Plan and General Use Permit (GUP).

Previous comments were provided in my oral testimony to the Santa Clara County Planning Commission at their meeting in Palo Alto on August 3, 2000, and in my letter of that date addressed to the Planning Commission that I entered into the administrative record at the meeting.

The issues in today's letter must be properly addressed before the Board of Supervisors can certify the Final EIR as complete and adequate.

HOUSING UNITS, POPULATION, AND GROSS SQUARE FOOTAGE

The information requested below on housing and population, and on gross square footage of academic space and housing must be provided in the EIR to allow a meaningful evaluation, analysis, and comparison of the proposed project with the alternatives to the proposed project.

The additional alternative to the proposed project described below must be evaluated in the EIR, because it could avoid or substantially lessen one or more of the significant effects of the proposed project.

GROSS SQUARE FOOTAGE OF ACADEMIC BUILDINGS AND HOUSING

- Table 2-2 on DEIR Page 2-14 needs to be expanded to:
- 1. Show comparable data for existing and proposed gross square footage (GSF) of Academic Space.
- 2. Show comparable data for existing and proposed GSF of all Housing except single family ho mes.
- 3. Include all GSF for the entire 2,100,300 GSF entitlement of the 1989 GUP.
- 107-2 The column "Existing GSF" in Table 2-2 includes "programmed development ... allowable under the 1989 [GUP]".

Does the Total Existing GSF include all 2,100,300 GSF allowable under the 1989 GUP?

If not, how much of the 2,100,300 does the Total Existing GSF include?

- 107-3 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?
 - If the Total Existing GSF includes less than the 2,100,300 GSF allowable under the 1989 GUP, what is the applicant's best estimate of how much of the balance will be "Academic Space" not including Housing, and how much will be Housing?
- 107-4 Table 2-2 must be revised to add two new columns, so that the table contains separate columns for:
 - 1. Existing Academic Space GSF, including the estimate of Academic Space to be built using the balance of the 1989 GUP entitlement.
 - 2. Exi sting Housing GSF (except single family homes), including Housing built and/or approved before the 1989 GUP, and including the estimate of Housing to be built using the balance of the 1989 GUP entitlement.
 - 3. Additional Academic Space GSF for the proposed project.
 - 4. Additional Housing GSF (except single family homes) for the proposed project.
- 107-5 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).
- 107-6 Where necessary, the housing categories identified by the

applicant must be divided into more categories to perform the calculation of Housing GSF.

For example, the document Summary and Explanation, Stanford University Draft Community Plan and General Use Permit Application, submitted to Santa Clara County November 15, 1999, at page 7, states that the project includes housing for "1,900 single graduate students to be housed in apartments or group housing", that "Graduate student apartments will also be suitable for single postgraduate fellows", that the apartments for hospital residents and postgraduate fellows can be used by "young faculty", and that the faculty and staff housing is "A mixture of detached single-family homes, townhouses, condominiums, duplexes, and apartments."

To calculate the Additional Housing GSF it will be necessary to use at least two different sizes of graduate student housing, and it will be necessary to use many different sizes of faculty and staff housing.

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 the population category occupying the units.

107-7 The EIR must also include a table that compares the Existing GSF (including the balance of the allowable GSF in the 1989 GUP) and the Additional GSF for attached fa culty 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.

- 107-8 The EIR must also include a table that compares the number of Existing and Additional single family detached faculty and staff homes.
- 107-9 Figure 2-5 on Page 2-11 of the DEIR 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.
- 107-10 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/St aff (Moderate Density).
- 107-11 The EIR must have separate land use designations for apartment housing and group housing.

PROVIDE CONSISTENT DATA FOR POPULATION AND HOUSING UNITS

- 107-12 Table 4.3-7 on DEIR 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 DEIR 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.
- 107-13 The most complete and detailed population and housing figures are those contained in GUP Annual Report # 11.
 - The 1989 GUP set limits on total Stanford population, regardless of which jurisdiction had that population.
 - Thus, The 1989 GUP population limit includes S.L.A.C. population in San Mateo County and Medical Center population in Palo Alto.
 - The EIR must consistently refer to all populat ion using the same standards that are used in the 1989 GUP.
- 107-14 Faculty population must include all faculty at the General Campus, Medical Center, and S.L.A.C.
 - Student population must include all students at the General Campus, Medical Center, and S.L.A.C.
 - Staff population must include all staff at the General Campus, Medical Center, and S.L.A.C.
- 107-15 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.
- 107-16 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.
- 107-17 The EIR must replace 1999 with 1998-99, unless data are available for 1999-2000, which should be used instead.
- 107-18 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 d ifferent total for students housed if used.
- 107-19 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.
- 107-20 The academic year 1989-90 must be used consistently.
- 107-21 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.
- 107-22 The categories of "Hospital Residents" and Postgraduate Fellows" must be shown separately and must be cross-referenced to the appropriate line item or items in Table 1 on page 3 of GUP Annual Report # 11.

ELIGIBLE FACULTY/STAFF HOUSING TABLE

- 107-23 The table for eligible faculty and staff must show for each year:
 - 1. The total eligible population.
 - 2. The total units on campus.
 - 3. The total units without an eligible person (for example, units with widows or emeriti faculty and staff).
 - 4. The difference between number 2 and number 3 above.

- 5. The number, based on substantial evidence, of non-resident eligible faculty and staff who want to move on campus to occupy the existing or proposed units (that is, the housing deficit).
- 107-24 The EIR must all include an estimate for the year 2010 of the number of units without an eligible person.

OTHER POPULATION CATEGORIES

- 107-25 The table or tables 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).

SUBSTANTIAL EVIDENC E

107-26 The numbers 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.

For example, the document "Summary and Explanation" at page 9 states that the on-campus housing for undergraduates is "full demand", because "a small percentage chooses to live of campus" and, therefore, the deficit for undergraduate housing is zero.

At the County Planning Commission meeting of August 3, 2000, there was testimony from members of the Stanford Graduate Student Council that the graduate student housing deficit was less than 1,000 units, although the project plans to build 1,900 to 2,000 units.

Mary-Lee Kimber testified that 985 graduate students who applied for on-campus housing were not assigned to housing units, because there were not enough units.

Paul Hartke testified that Stanford is subsidizing the rent in off-campus apartments for 840 grad uate students.

Similar substantial evidence needs to be provided for the deficit shown in the EIR for the other population categories.

OFF-CAMPUS HOUSING

107-27 The GUP Annual Reports give Stanford credit for housing its population in off-campus housing at 1100 Welch Road in Palo Alto, which affects the calculation of the "no net new commute trips" traffic mitigation, although the 1989 GUP makes no provision for using off-campus housing for this purpose.

The EIR must evaluate mechanisms to guarantee that any off-campus housing used to satisfy mitigations for numbers of housing units, or for other purposes, is permanently reserved for use by Stanford students, faculty, and staff.

For example, if Stanford wants the 628 apartments at Stanford West to count against any housing deficit, then the EIR must contain a condition that Stanford be required to fill all 628 apartments with students, faculty, and staff before building other housing.

BUILD HOUSING WITHOUT INCREASING POPULATION

107-28 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.

This alternative is needed to enable readers of the EIR to understand the environmental-effects of having the right amount of housing to serve students and eligible faculty and staff who want to live on campus, without there being either a deficit or surplus of on-campus housing units.

FIXED AND VARIABLE ADDITIONAL ACADEMIC GROSS SQUARE FOOTAGE

107-29 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.

ALTERNATIVE HOUSING LOCATIONS

107-30 The proposed housing sites D and I, and part of E are outside of Palo Alto's Urban Service Area in violation of Palo Alto Comprehensive Plan Policy L-1 and Map L-2.

The EIR must evaluate strategies for alternatives to these housing sites, including alternative locations for the housing, and requiring Stanford to occupy housing at other sites before building on sites D, I, and E.

107-31 The proposed redevelopment of Escondido Village at site C is based on replacing one-story wood frame buildings with two-story wood frame buildings.

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.

107-32 If the EIR demon strates that housing outside Palo Alto's Urban Service Area is unavoidable, 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 along El Camino Real that serves as a buffer between urban Palo Alto and urban Stanford development.

Stanford University's Land Use Plan -- 1980 in the map of the "Central Campus Land Use Plan 1980-2010" at page 29 designated the area bounded by Arboretum Road, Galvez Street, Campus Drive, and Quarry Road as "Academic Reserve and Open Space" to distinguish it from the area along El Camino Real and Stanford Avenue that was designated Special Reserve and Open Space.

The 1980 Plan at page 27 states, "The southerly portion of the Arboretum is shown as 'Academic Reserve and Open Space' to indicate its future availability as an alternative to expansion in the foothills if further demand should occur."

107-33 The EIR should evaluate the alternative of building housing in the area bounded by Arboretum, Galvez, Campus Drive, and Quarry, instead of building on sites D, I, and E.

The EIR should evaluate the mitigation of requiring Stanford to build on all other housing sites before building on sites D, I, and E.

The EIR should evaluate the mitigation of requiring Stanford to use all 628 apartments at Stanford West in Palo Alto for faculty, students, and staff before building on sites D, I, and E.

GOLF LANE

107-34 My August 3, 2000, letter to the County Planning Commission requested that the alternative golf course locations identified in the 1971 Stanford University Land Use Policy/Plan be evaluated for a relocated or second golf course.

The secondary effects of moving current uses on those sites must be included in the evaluations of those alternatives.

In addition, the EIR must provide the legislative record from the County or, if necessary, the record from Stanford University that explains the curious coincidence that the alternative golf course location Interdale between Los Trancos Creek, Interstate 280, and Felt Lake, is accessed from Alpine Road via a road named Golf Lane.

The EIR must document when Golf Lane was named and must document why it has that name.

Thank you for providing complete and adequate responses to all of the issues raised in this letter.

Sincerely,

Herb Borock

Get Your Private, Free E-mail from MSN Hotmail at http://www.hotmail.com

Herb Borock
P. O. Box 632
Palo Alto, CA 94302

August 7, 2000 (Second Letter this date)

Ms. Sarah Jones, Associate Planner Santa Clara County Planning Office 70 West Hedding Street, East Wing, 7th Floor San Jose, CA 95110

STANFORD UNIVERSITY DRAFT COMMUNITY PLAN AND GENERAL USE PERMIT DRAFT ENVIRONMENTAL IMPACT REPORT, STATE CLEARINGHOUSE # 1999112107
SANTA CLARA COUNTY FILE # 7165-07-81-99GP-99P-99EIR

Dear Ms. Jones:

108-1 This letter clarifies and corrects one of the issues I discussed in my earlier letter of this date that needs to be answered completely and adequately in the EIR for this project.

In the section "Alternative Housing Locations" of that letter, the third and fourth paragraphs (the paragraphs about Escondido Village) should read:

The proposed redevelopment of Escondido Village at site C is based on replacing two-story wood frame buildings with four-story wood frame buildings.

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 this requires replacing wood frame construction with steel frame construction.

Thank you for including this clarification and correction with my previous letter.

Sincerely,

Herb Borock

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Susan Cole <susanc@rahul.ne

To: sarah.jones@pln.CO.Santa-Clara.CA.US cc: susanc@rahul.net, mforster@slip.net Subject: comment on Stanford's Draft EIR

08/07/00 04:49 PM

Dear Planning Commission,

I'm writing with regard to Stanford's request for a General Use Permit and their Draft EIR. As a resident of Stanford Avenue itself, I have been and will be affected during the coming years by the increased traffic, noise, and other effects of Stanford's ongoing building push. I am one of many, many Palo Altans who are unhappy with the provisions that the University has made for open space and accommodation of nearby communities.

- 109.1 I am particularly unhappy with the abrupt policy changes regarding use of the "Dish" area. Many of us who have walked dogs in this area for years are very upset that the university has abruptly decided to withdraw its permission to do this, at the same time that it will burden us with the effects of its construction projects. This ban on dogs will effectively ban hundreds of community members from hiking in this
- 109-2 Further, it appears that the university has declared parts of this foothills area to be "conservation areas" only to further its own goals to build. It is moving the endangered tiger salamander from land on which it wants to build housing, to man-made ponds which are it is expected to use as breeding grounds. There university is eager to have this action approved without any proof that the relocation will succeed and that the salamander will survive. Yet it claims that concern for the species motivate it to declare that dogs cannot be walked on leash even hundreds of feet from the breeding ponds. This despite the fact that dogs are allowed in many areas of the Don Edwards National Wildlife Refuge with no harm to wildlife.

Please require the university to show more accommodation to its neighbors before considering granting it a General Use Permit.

Sincerely, Susan Cole susanc@rahul.net 650-321-9447

420 Stanford Avenue Palo Alto, CA 94306



"Eric Fertig" <efertig@hotmail. com>

To: sarah.jones@pln.CO.Santa-Clara.CA.US

CC

Subject: Comments on the Stanford GUP/CP DEIR

08/07/00 02:09 PM

Sarah,

110-1 I delivered two letters to the SCC Planning desk this morning. I signed the letter, but didn't include my return address on the letterhead. The subjects are:

"Stanford CP/GUP Draft Environmental Impact Report" and "SCC Failure to Address Stanford Wildlife Refuge in Environmental Documents."

I have attached copies of the letters to this message. Please include these with public comments on the DEIR.

Thanks,

Eric Fertig 275 Hawthorne Avenue #205 Palo Alto, CA 94301

Get Your Private, Free E-mail from MSN Hotmail at http://www.hotmail.com



- stanford refuge.doc



- final letter to county final.doc

Sarah Jones, ace county planner for Stanford stuff:

This is a comment on the DEIR for the proposed Stanford University Community Plan and General Use Permit.

- 111-1 I have two main suggestions:
 - 1) Add CP policies regarding baseline data, data validation, thresholds of inaccurate data provided, and remedial action when thresholds are exceeded. Modify the EIR and the GUP appropriately.
- 111-2 2) Remove from the Program EIR the hydrology section, and any other parts that are similarly inadequate, so that planners are not deceived. A subsequent program EIR can be performed.
- 111-3 HOW THE DEIR ANALYZES COMMUNITY PLAN POLICIES

Here is a serious, basic problem. How does a DEIR analyze Community Plan policies? This DEIR does not address the individual, enumerated CP policies. Shouldn't the analysis of the CP consider whether the policies proposed are sufficient to provide accurate, verifiable data regarding environmental variables? Without such analysis, it would be okay to use arbitrary data for establishing baseline conditions, and the EIR would allow continued use (with impunity) of information from a demonstrated unreliable source. What will be the county policy on verification of data? I would suggest policies that at least verify some of the baseline data has so far been accepted in the annual reports.

If threshold policies were contained in the CP, then multiple instances of inaccurate information would trigger responses from the county. Would not the CP be the proper place to include policies setting up the framework for handling these problems, and should not the EIR analyze this? The MMRP and other conditions are important. However, examination of the CP shows that there is a need for policies that will provide balance to the broad, vague language giving "flexibility" to Stanford development. An example is CP policy SCP-LU 6 is:

"Assist Stanford in responding to land use implications arising from the
changing Silicon Valley environment."
Is the "Silicon Valley environment" defined anywhere?

Is there an implicit policy that makes information provided by Stanford more believable than information from other sources? How will county policies deal with conflicting information? My May 7, 1999 comment to the county Architectural and Site Approval Committee re: 7236-08-81-98EA , ASA of Stanford Escondido Village housing application is another example. I wrote:

111-5 "It is not accurate to say that runoff from Escondido Village drains into the drainage ditch (a surface waterway) along Serra Street. The topography is such that runoff flows toward the intersection of El Camino and Stanford Avenue and away from the Serra Street drainage ditch...it is evident that the Serra Street drainage ditch is elevated above the street and is up to ten feet higher than the Escondido Village land across Serra Street."

Well, Stanford said one thing, and I gave conflicting information. Did the

county determine who was correct? No.

- 111-6 Mitigation and monitoring should not be left without consideration in CP policies.
- The hydrologic NOP scope of work is listed on pp. 12-13 in Appendix A of the DEIR. Should the scope of work be examined for completeness in a DEIR? This DEIR shows, but does not mention that virtually none of the hydrologic scope of work was properly completed. Perhaps the DEIR just omitted the details for public benefit. The NOP scope of work and the responses from SCVWD and others were a good start; I don't know what happened to cause the analysis to go bad, almost as if the people gave up and decided not to do the work. This section covers the incomplete work specified in the NOP as well as other problems. This section of the DEIR should not be represented as informational to planners; it should be removed from the Project EIR and analyzed and again presented for public comment in a future EIR. Just use common sense and hear this:

Today, August 7, 2000, at approximately 2 P.M., I used a ruler and measured 10 inches of standing water in a storm drainage surface "ditch" (unpaved at the location) along Serra near the recycling station. This is a channel for storm drainage and there is 10 inches of water in it. Oops, I forgot to measure how deep the channel was, but it was about 3 feet deep. Is there another channel with standing water this deep in the region? No. It hasn't rained recently. Think about it.

- 111-8 Before I continue, I have to say that the DEIR does find that any increase in storm water runoff flow rate would be a significant environmental impact. The trouble is that the mitigation is just to require Stanford to prevent any additional runoff in construction a few million square feet of whatever. Great. Detention facilities are the answer, but there is no analysis of them. Common sense says that this will not work, but I say that through very, very thorough analysis, design, etc. it can work. Dig a deeper ditch without other environmental consequences.
- 111-9 The definition and the maps of areas subject to flooding are not based on the "East Campus Storm Drainage Study". The NOP specifies that this study be used. The study is also referenced in the "Stanford University Escondido Village Graduate Student Housing" project Initial Study (April, 1999) on p. 39:
 - "...East Campus Drainage Study to assess storm drainage capacity and flood hazards in the East Campus area. That report, expected to be completed in $\min -1999...$ "

This study is not mentioned in the DEIR outside of the NOP. This is a serious omission. This is a study that was to have been completed a year ago. What happened? Remove the hydrology section until the study is completed. Water detention areas need analysis, especially when the storm drain surface conduits are darn close to retention areas.

- 111-10 The CP does show an applicable map of flooding areas, but it is based on "Federal Emergency Management Agency Flood Insurance Rate Map 1996".

 The flood in 1998 changed all prior information. The flood is not mentioned in the hydrology section, the map is outdated.
- 111.11 The DEIR contains only a very general description of Stanford storm drainage system. The surface conduits are mostly unpaved ditches and they are not described or mapped. The most obvious conclusion is that there is no way to show that significant impacts can be mitigated to a less than significant level because the system is a mess.

But wait, there is more...

- 111-12 The DEIR established that between 1980 and 1992 about 14 inches of rain per year was measured at the baylands. Not that it has much to do with Stanford precipitation figures. The number is possibly used in the model cited. It is difficult to ascertain because the modeling parameters are not presented for public comment. They should be included in the DEIR and I request that it is included and that the public have opportunity to comment.
- 111-13 The area is divided into 14 sub-watersheds (not clear if the entire San Francisquito Creek watershed is modeled, or the entire Matadero/Adobe). You are thrilled to know this. Technical Release 55 (TR-55) is the program used to model this hydrologic system. Wrong program to use as the following comments show.
 - "TR-55 was designed primarily as a set of manual worksheets."
 - "While the TR-55 manual remains a most useful reference (it contains complete curve number tables and rainfall maps, among other things) most engineers have sought out more advanced or more accurate hydrology software."
 - "Limits: NRCS type distributions, 24-hour duration rainfall, 10 subwatersheds, minimum 0.1 hour and maximum 10-hour time of concentration."

TR-55 analysis of detention areas require that the areas dry out completely before the next rainfall. The situation of more than 24 hours of rainfall (over many days) causing saturated soil conditions is not in the capability of the model. The model's limit of only 10 subwatersheds while the DEIR uses 14 is an issue that is another can of worms.

More appropriate models are available and should be evaluated: "The United States Environmental Protection Agencies (USEPA's) Storm Water Management Model (SWMM) is a comprehensive computer model for analysis of quantity and quality problems associated with urban runoff. Both single-event and continuous simulation can be performed on catchments having storm sewers, or combined sewers and natural drainage, for prediction of

flows, stages and pollutant concentrations. Extran Block solves complete dynamic flow routing equations (St. Venant equations) for accurate simulation of backwater, looped connections, surcharging, and pressure flow.

Modeler can simulate all aspects of the urban hydrologic and quality cycles, including rainfall, snowmelt, surface and subsurface runoff, flow routing through drainage network, storage and treatment. Statistical analyses can be performed on long-term precipitation data and on output from continuous simulation. SWMM can be used for planning and design. Planning mode is used for an overall assessment of urban runoff problem or proposed abatement options."

"Imperviousness is probably a significant parameter affecting the mismatch of a hydrograph's recession limb. This statement is based on my experience that the mismatch is more pronounced in urban (high % imp) watersheds. Rural (low % imp) watershed hydrographs are much better. Also, another rainfall-runoff model PSRM (Penn State Runoff Model) that I have used in the past, did not have this problem."

The question raised in the above quote is how well the model used in the DEIR analysis has been validated. If it doesn't add up, it doesn't work.

111-14 Water quality. The region is not in compliance, discharge of copper into the bay in our locale (from the Palo Alto Regional Water Quality Control Plant):

"The RWQCP still exceeded the 4.9 ppb limit by a factor of more than 1.8 in 1997"

The DEIR indicates 5 sampling points used for water quality analysis. The dates of the samples are said to be somewhere between 1993 and 1999; no raw data is provided. None of the sample points were in the San Francisquito Creek watershed. Invalid analysis.

- 111-15 The review of historic stream flow and stream gauging data is not in the DEIR, though it is available to a certain extent. More data can be inferred using computer models that have been validated and the available measurements.
- 111-16 And the identification of BMPs seems confined to letting someone else do it or having parking lots include grassy swales or vegetated filter strips.

 Good job if your not looking at Stanford (maybe).
- 111-17 What I would like to say is get real. There was a flood in February of 1998 that severely affected Stanford and Palo Alto, including College Terrace.

 Does the county wish to accept liability in the event of more flooding and use this EIR as a defense?

Other quick items:

111-18 Stanford Community Plan - Land Use Plan Designations
Open Space and Academic Reserve (E-SA)

"The use of these areas is limited to conservation activities, field environmental studies,

preexisting academic activities, and agriculture."

There is no way of examining this without a list of what activities are currently occurring in these areas. I do not consider growing plants in boxes on impermeable surfaces, or stables for horses used in recreational riding as agricultural use, but that is just my opinion. I asked county planning (email to Sarah Jones -- July 20 and Aug. 1, 2000) about the use of a certain E-SA parcel and did not receive an answer. The DEIR does not provide enough detail to allow analysis of this land use category. I request that reasonable opportunity be given for public comment.

111-19 SCP-HS 1

Support efforts to reduce particulate matter pollution originating from road and building construction.

"The U.S. EPA is under court order to complete a review of the PM10 standards by January 1997. A recently released EPA staff report is recommending new standards for fine particulate matter (PM2.5) based on the latest health data. The SCAQMD will strive to develop a control strategy that is consistent with strategies needed to attain a PM2.5 standard in the future."

References available on request, because I am supposed to have finished this and emailed it by 5pm.

Sincerely,

John Baca P.O. Box 18527, Stanford, CA 94309 verdosa@hotmail.com

650/473-0996

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- comment.doc

To: sarah.jones@pln.co.scl.ca.us, joe.simitian@bos.co.santa-clara.ca.us, hennessy @stanford.edu, save-stanford-goIf-course@mail.com

From: Ann Norton Porter and Richard P. Porter, Golf Cub Members 902 Peninsula Ave. #305, San Mateo CA 94401 Phone 650 342 1771

Subject: Save the Stanford Golf Course in its entirety including the Stable Site (Code 0).

Reference: Summary and Explanation, Stanford University Draft Community Plan and General Use Permit Application (Submitted to Santa Clara County 11/15/1999

- 112-1 We agree that the housing problem must be solved in order to maintain and improve Stanford's high academic standards, but feel there are other housing options available. These options include attractive parking structures like those already on campus to free up space for housing, semi high rise structures such as those in Escondido Village, a minimum amount of the open space near El Cameo Real and lands in San Mateo County. We are sure there are many other solutions that will be forthcoming.
- Private and public golf courses in Northern Santa Clara and all of San Mateo 112 -2 Counties are few in number when compared with the dense population of these areas. Even though the Stanford Golf Course is considered private, it is far from that description. Stanford Students, Stanford Alumni, Stanford Faculty and all Staff including those connected with the Stanford Medical Facility. SLAC and SRI are eligible to play golf. The number of rounds of golf played per year rank near or above the number of rounds played at most public courses. There are no tennis courts, swimming pools, adequate club house facilities or a future practice driving range (Code F) available compared with private golf clubs, yet yearly family dues are comparable. Starting times are procured four days in advance by checking in at the course at 4:30 AM or by phoning at 6:15 AM then waiting for the call to be completed to make your starting request. When you consider seventy years of alumni and their friends you have a golf eligibility list that compares with most public golf communities. The Stanford Course is a real treasure and most likely can never be rebuilt in this area and in this era of restricted land use.

This golf course and equestrian compound both have a significantly rich history. The course was designed by a famous golf architect, Mr. George Thomas and is ranked as one of the top hundred courses in the USA. Each hole is a signature hole and to lose any hole takes away from its overall beauty and continuity. There are high school student golf athletes who dream of acceptance at Stanford not only for the degree but to become part of its golf history made by former student-athletes such as Lawson Little, Bob Rosburg, Mickey Wright, Tom Watson, Notah Begay, Casey Martin and Tiger Woods.

112-3 The Equestrian Stables history, of course, goes back to Leland Stanford where proof was made that a galloping horse has all four legs airborne. This early research set the stage for a great research university. We wonder about the noise impact of trucking horse feed and its odorous byproduct so near to any

housing, assuming that some stables will be left adjacent to the Red Barn historical site.

Very few universities in the USA can offer golf as well as equestrian recreation and competition to their student bodies, faculty, staff and alumni. Please save these treasures as open space and preserve their present use because they can probably never be duplicated.

Thank you for your consideration.

Ann Norton Porter and Richard Porter

Dear Ms. Jones,

113-1 I am writing in opposition to the Stanford University Community Plan/General Use Permit. Specificaly, I am opposed to the portion of the plan that re-zones part of the golf course for development. This portion of the plan is unnecessary, incompletely, and ill-conceived. The County should not grant Stanford its request to re-zone the golf course from open space to developable land.

First, it is not necessary to develop on the golf course to meet the housing and academic needs of the University. In fact, Stanford is choosing to develop on some of the most utilized space on campus while preserving some of the least utilized space on campus. The same Plan that proposes to destroy a highly-regarded, historic, 70 year-old golf course sets aside the area between the Football Stadium and Stanford Shopping Center as Campus Open Space. This land, bounded by El Camino Real, Galvez, Quarry, and Campus Drive is among the most underutilized land on the campus. It is also closer to the central campus, public transportation, and Palo Alto. From both a current utilization and a proximity standpoint, Stanford is making a mistake by not developing there first. Please recommend that this area, with the exception of the Stanford family mausoleum, be developed first.

113-2 Second, the development plan is incomplete with respect to the golf course. It provides absolutely no specifics about how it will replace the first hole, much less any of the other holes on which Stanford will be able to develop under the proposed plan. In fact, the plan's summary document explicitly admits this. Conveniently this allows the plan to avoid having the impact of highly disruptive and environmentally disturbing golf course construction in the Environmental Impact Report. Additionally, in order to replace the holes it destroys Stanford will have to have a second development plan approved once the specifics are determined. Can the University guarantee approval of such a plan? The University should be required to provide just as specific plans for replacing these holes as it does for destroying them. Please recommend that the plan be amended to include these plans so that the County can have the whole truth.

Finally, development on the golf course is ill-conceived. The golf course is a major recreational resource to the Stanford community. It is also an historic treasure and an environmental haven, particularly the "lower seven" holes that run along the San Francisquito Creek on which development is possible under the new plan. I am sure many others have commented to the County on the value of the golf course to the community and as an historic treasure. In the interests of brevity I will only echo those sentiments.

Thank you for your time and consideration.

Sincerely,

Winthrop S. Reis 276 37th Ave. San Mateo, CA 94403 Stanford alumnus and friend of Stanford Golf

To: Ms. Sara Jones
Santa Clara County

I understand that in the course of the next several weeks various hearings will be held on the question of Stanford University's plan to reclassify the golf course lands so that they can be used for additional housing and other non-open space use. I would like to give you some input prior to those meetings. I am a Stanford alumnus, a member of the golf course, and a resident of Santa Clara county for 30 years.

- I find the University's proposal to rezone the first 7 holes on the golf course from open space to academic use to be extremely unwise for a number of reasons. I would hope that the County would consider them in its evaluation.
 - 1) The University golf course is a "historic" landmark that has been around since the early 1900's. It has been listed as one of the top 100 golf courses in the country. It was designed by a world renowned architect George Thomas. It has been the home of numerous championships, and is used by many, many charitable organizations for golf outings that draw particiapants from all over the Bay Area. The golf course simultaneously serves functions of open space, landscape design, environmental protection, general recreation, and athletic competition. It serves not only Stanford University, but the mid-Peninsula area, Northern California, and the world of golf. It has helped attract such world renowned golfers as Tom Watson, Tiger Woods, Nota Begay, and Casey Martin to the University.
- 114-2 2) The University surely has many alternatives for housing including lands adjacent to the golf course that are being used for landfill, occasional equestrian events, and the like. Land 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 rerasonable sites that would create no more environmental impact, or traffic congestion than what is being proposed by removing holes #1 #7 of the existing golf course.
- 114-3

 3) Before any decision is made with respect to approving the University's request for rezoning the "open space" lands, it would seem to me that the alternatives of higher density housing in the inner campus should be considered before simply grabbing the golf course land. This type of compact inner campus development would certainly have far fewer environmental impact problems than if open space was developed.
- 114-4
 4) The changes in the open space designation affect not only Santa Clara County, but San Mateo County, as well. I believe that many of the holes on the golf course are located in San Mateo County and certainly the environmental impact of any shift in the layout of the golf course, or any changes in open space that would impact traffic in and around Sand Hill Road should be brought before the San Mateo County Planning Commission.

I am sure there are many more points that are extremly relevant to

Stanford's rezoning proposal, and I am sure they will be brought out by others at the public hearings and in the months to come.

Thank you for giving consideration to all aspects of Stanford's request. This is certainly not a request which should be treated in a routine manner. I trust you will take the necessary time, and require the necessary studies, before any decision is made.

Sincerely,

Bill Krepick 1458 Meadow Lane Mountain View, CA Ms. Sarah Jones Santa Clara County Associate Planner

Subject: Stanford University's proposed changes to the Stanford Golf Course and driving range.

Dear Ms. Jones:

I am submitting this letter to register my opposition to any of Stanford University's proposed options that may result in the alteration of the existing Stanford University Golf Course or golf driving range. I have read pertinent portions of the GUP application and understand that the University would like to use the Golf Course and driving range for academic buildings and housing should their first options not be permitted.

115-1 Stanford Golf Course should not be tampered with any more. The course is a masterpiece of golf course architecture and, although slightly altered some 25 years ago, still remains one of America's classic courses. It is over 70 years old and has provided important environmental habitat, recreational open space, and a buffer on both sides of a significant stretch of San Francisquito creek for all of those years.

One of the options that Stanford is considering would put buildings on the first hole. Once this step is taken, it would not take too much more for the University to then proceed to put buildings on each of the next six holes, thereby eliminating essential qualities of the Course. The Course straddles both sides of San Francisquito Creek, which gives it unique playing features and environmental qualities that would be impossible to recreate in other sites on Stanford land. The land that is proposed for replacing the first seven holes is hilly and dry, and could never replicate the relatively flat (but still very interesting, challenging, and visually striking!) nature of the original holes.

A golf course cannot be considered as a collection of isolated and independent holes, nor should it be dismembered hole-by-hole. The first hole at Stanford, like at many other great courses around the world, provides what some golfers refer to as a "handshake"-- that is, an easy introductory hole. Following that hole, various challenges are encountered on the ensuing six holes, including shots over the creek as well as shots requiring skill to avoid numerous hundred-year-old oak trees dotting the Course. If the first hole is taken for housing, and the next six holes are eventually consumed for building development, these essential features of the course would be eliminated. Consequently it would completely destroy what is already a complete golf course, in terms of both golf course architecture as well as environmental habitat

The golf driving range is also an essential fresh-air recreational facility for Stanford students, faculty and staff, as well as the general public. It is easy to drive by and see that this facility is always busy and provides close-in recreation for Stanford and the surrounding communities. Its proximity to the Stanford Golf Course is also an essential attribute that

should not be disturbed.

115-3 I was born and raised in Palo Alto, and I am an avid golfer who has played many rounds at Stanford. Professionally I am a research physicist who is keenly aware of Stanford's needs for more academic buildings and housing. For the above-stated reasons, I urge that the Golf Course and driving range not be altered. The University should pursue alternatives, including redeveloping other areas within the campus, near the campus, and along other undeveloped corridors near Junipero Serra Blvd. (JSB) and Willow Road.

Sincerely yours,

Kenneth R. Stalder, Ph.D.

515 King St.
Redwood City, CA 94062
650-367-1359
krstalder@aol.com

Ms. Jones,

I will be out of town the day of this Thursday's Santa Clara County Planning Commission hearing on the Draft Environmental Impact Report (EIR) for Stanford's General Use Permit and Community Plan. However I would like to forward my comments. I have several concerns.

- 116-1 First, I live in Palo Alto, and have for the last 35 years. I am concerned that the added car trips generated by Stanford's planned development will send our city streets into gridlock. It is already impossible to get to my doctors office, near Stanford Hospital, in anything like a timely manner. The elementary public schools, on Stanford avenue, and the high school, on Arastradero are similarly affected by traffic on the west side of campus. Previous GUP projections of traffic growth have underestimated the number of added trips, on Stanford Avenue by over a thousand daily trips. I do not think it is appropriate to add more development, especially on that west side.
- 116-2 Second there are not enough guarantees that the Stanford mitigation planned to create habitat for the California tiger salamander, is going to work. Stanford seems to be operating under the theory that "If we build it, they will come." And if they do not start to breed in the new habitat, Stanford could already have built on the Lagunitas area under the current GUP. As the old saying goes, "Extinct is forever," and I do not think it is appropriate to take that kind of risk with an active colony of one of our native species.
- Thirdly, I think that approval of the environmental impact of the Carnegie Foundation project and of Stanford's proposed new use permit be considered together. Considering them separately is disingenuous. They affect the same environment, let Stanford put all of it's cards on the table, and allow the process to consider the combined impact of it's development plans.
- Fourthly, Stanford needs to at least entertain the idea of providing support for a middle school. All they have done with previous offers is deliberately offer a location that would pit environmentalists against school supporters. If they build the housing that they truly need, a school will be even more necessary than it is now.
- Finally, this area needs open space, and that need should be considered on a par with Stanford's need to hold these glorious hills hostage as "academic reserve." Enough of our valley has been lost to unbridled prioritization of economic needs. Let us look at the true value of open space, not just it's monetary value. I strongly believe that the area west of Junipero Serra should be permanently protected as open space.

To conclude, I would ask that you look at the big picture of what this county needs; it's traffic needs, it's environmental needs and it's need for both it's cities and academic entities to work together in creating a long-term plan that will meet those needs. This is not a game of poker that Stanford can win if it bluffs us out. We all need to partner in creating a plan that will create viable, livable communities ten years from now, when we next consider the Stanford GUP. Does the this GUP and it's draft EIR meet those requirements? I do not believe they do in their current form.

Thank you for your time and attention in reading these comments. I know they were long.

Kirsten Flynn Kir@declan.com (650)855-9464

"We hope that the world will not narrow into a neighborhood before it has broadened into a brotherhood."

Lyndon Baines Johnson 1908-1973

Dear President-Elect Hennessy,

This letter is about the proposal to build faculty and student housing on what is now the first hole of the University's golf course (where, in the interest of full disclosure, my wife and I regularly play). We applaud the University's intention to provide more faculty and student housing. We realize that a number of constraints affect the selection of sites for additional housing. We recognize that the interests of Stanford golfers must compete with other University interests. If the need for new housing is best met by taking the first hole of the course, we must lose it.

At a meeting with concerned golfers at the clubhouse a week ago Larry Horton and three others (the Chairman of the faculty committee, a gentleman from your office and a gentleman from what used to be called the planning office) gave a clear and well-organized presentation. Mr. Horton and the others responded courteously to questions and statements of concern and kept their cool when temperatures rose.

On examination, however, the presentation was unconvincing. As I reconstruct it, the argument proceeded by elimination. Using charts of Stanford's lands, we were first shown which large areas were committed by the existing general plan to other uses. Then we were told why specific apparently suitable alternative sites within the appropriate campus area were unavailable for additional housing. Some of the reasons given during this part of the presentation seemed, with respect, to be the kind of partial truths that, taken alone, cannot be dismissed but, when combined, can lead to absurdity. At the end of the presentation, *voila!* all that remained for additional housing was the first hole (plus the driving range and an area north of the first hole). In short, we were asked to accept that the first hole was the only available site, rather than a choice among alternatives, and we were unconvinced.

We believe that the selection of sites for additional housing on campus is, as it should be, a process of choice among alternatives, and we believe that the first hole is a poor choice. The argument depends in large part on the value one assigns to the golf course and to the first hole as part of it. I will here briefly state things you already know but that others who may see this letter may not understand or appreciate. The Stanford golf course is considered by knowledgeable people to be, along with Yale's, one of the two or three finest college courses in America. It trequently appears on lists of the [some number between 25 and 100] best golf courses in California and the USA. Its beauty provides significant amenity for Stanford and neighboring residents and for people driving, cycling and running on Junipero Serra and Alpine Road. It is in fact a treasure among golf courses and a valuable University asset. The first hole is spectacular, one of the most dramatic holes on the course, and its removal would significantly diminish the quality and the beauty of the course.

117-1 If the forces of darkness prevail and the first hole is indeed to be sacrificed, it will have to be replaced. Although we heard some vague talk, we have not been shown plans for a proposed replacement for the first hole. Nor were we informed of any concrete steps to begin planning and designing a replacement hole and reconfiguring the course. We believe that such planning should be approached through engagement of a leading golf course designer, with the intention to provide a new hole and a reconfigured course of equivalent excellence.

But we would strongly prefer that the first hole be retained and that the resources that would be used in reconfiguring the course and designing and building a new hole be instead spent in developing new housing at a more appropriate site.

Collegially yours, John

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> Dear Joe and Sarah,
118-1 > I feel very strongly that Stanford open space remains "open". If they
       > need to continue to expand then they as a university need to look at what
       > they should specialize in and use their space for that specialty.
       > Stanford has an unique challenge due to their geographic location. They
       > should investigate alternatives, like creating satellite location where
       > they can then be located in area that does not have huge environmental
       > issues related to growth. Here on the Peninsula we are very concerned
       > with overcrowding and how all of this growth is going to impact on our
       > environment. I believe that:
                    Stanford's development proposal would result in huge
       environmental
       > impacts on surrounding communities. These impacts should be fully
       > mitigated, and if they can't be, then the project should be reduced in
       > scale or/and the University should review what can be accomplished outside
       > of their existing campus.
118-2 > *
                    The Academic Growth Boundary should be consistent with Palo
       > Urban Service Boundary (along Junipero Serra Blvd. and excluding the golf)
       > and should be made permanent.
118-3 > *
                    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.
118-4 > *
                    Stanford should be required to continue its current policy of "no
      > net new commute trips." Stanford has already been given adequate
      > development rights because its daytime population in unincorporated Santa
      > Clara County (the area covered by the General Use Permit) is already 40%
      > denser than Palo Alto's daytime population. Why do they get to expand the
      > campus by more than 4 million square feet over the next ten years, a 35%
      > expansion.
      > Thank you for your time.
      > Sincerely,
      > Amy Larson, PA Resident
      > alarson@teachtci.com
      > 615 COllege Ave
      > Plao Alto
```

Dear Ms. Jones:

I am very disturbed about Stanford's plans to build on the Golf Course for two reasons:

- -There is more suitable land closer to the core of the Campus and -Building on all or part of the existing course is a wasteful and environmentally destructive move.
- 119-1 Although Stanford claims there isn't any other suitable land on which to build housing, there truly are other options. Stanford could replace acres and acres of parking lots with multi-story parking structures. This would put the cars near where they're needed and free up land for housing. The other great universities in the east have done this successfully. Stanford could build up instead of out. This would avoid the sprawl that would result by following Stanford's past development approach. We no longer have the

luxury of building low intensity structures on land that is farther and farther away form the central campus.

119-2 Building on the Golf Course is one of the worst ideas I've ever heard of. In the Golf Course, you have 1) valuable open space that's a buffer between the campus and the foothills, 2) a wildlife habitat that is home to close to a hundred different species, including one endangered specie, 3) a recreational resource in an area that seems to have fewer and fewer such resources (even though the course is not open to the general public, many people get to play it as guests, participants in charity tournaments, and as the 30,000 students, faculty and staff of Stanford), and 4) a classic golf course designed 70 years ago by one of the great American golf course

The ludicrous short term plan to build replacement hole northeast of the 2nd hole would result in a rinky-dink course where people would pollute the area more by having to drive their cars between the existing 18th green and the proposed new first hole, nearly a half-mile away.

The County of Santa Clara should not approve a plan that promotes urban sprawl and destroys valuable existing natural resources. It should approve a plan that concentrates the development in the core of the campus. To this end, please work to designate the Golf Course as permanent open space. Thank you.

Richard Stultz, Stanford MBA '69 Palo Alto, CA Dear Ms. Jones:

I am writing to you with regard to the Stanford Golf Course. As a graduate of Stanford University and a former NCAA All-American golfer while at Stanford, I urge you to recommend that the golf course be preserved in its present state, untouched and retained as the treasure that it is to the Stanford community. I recommend this not only with golf in mind but also for the sheer beauty to the eye that the Stanford Golf Course displays.

- 120-1 The Stanford Golf Course is a treasure for several reasons. First, it is valuable historically as the course itself dates back to the 1920's and was designed utilizing the natural flow of the land that exists in that area a rarity today.
- 120-2 Secondly, the game golf is not stricly an athletic endeavor. The golf course has value that far exceeds the physical playing of the game. It is a serene place of beauty where friendships are formed, renewed, and strengthened. Golf gives people, young and old alike, an opportunity to exercise the body and the mind, and to take in all of nature's wonders not only visually, but also auditorily and olfactorily. It is an activity unlike any other and I can't think of a better venue to enjoy the wonders of golf than the Stanford Golf Course.

Finally, let it be known that the Stanford Golf Course is architecturally and visually one of the finest and most beautiful golf courses in the world -- a Picasso to the golf world to remain intact and unchanged except by mother nature's whims, not by man's.

It is with a sense of urgency that I beg University officials to come up with a different plan!

Ms. Jones, thank you for considering this letter.

Respectfully and sincerely,

Kay Cornelius Jeanquartier LPGA Teaching Professional Ocotillo Golf Club 3751 S. Clubhouse Dr. Chandler, AZ 85248

Partial Golf Bio: 1981 US Girls' Junior Champion 1984-88 Stanford University Golf Team 1988 NCAA All-American Ladies European Tour Member '89-'95 Ladies Asia Golf Circuit '89-'94

Kay Jeanquartier alainkay@webtv.net

Dear Ms. Jones,

Thank you for your recent consideration to examine various alternatives to Stanford's proposed CP/GUP application. The concerns I have about Stanford's draft EIR in relation to the CP/GUP application to the County parallel many of those you heard at the Planning Commission meeting recently.

121-1 I am concerned about allowing development outside the City and County's urban growth

boundary and A-1 zoning designation, the imbalance of proposed job creation vs adequate and affordable housing, the high level of impact the growth will have on traffic congestion on 17 major intersections and surrounding residential neighborhoods, as well as decreased air quality, other infrastructure pressures, the impact on several threatened species, and the potential loss of one of the most beautiful areas left of open space on our Peninsula.

This is not a sustainable way to develop and use our economic and natural resources, and I would surmise that your staff could come up with some other much more

sustainable, creative, and responsible ways for the County to consider.

121-2 As a participant in the Stanford Open Space Alliance and a long-time open space proponent and conservationist, I have collected signatures over the past several months near the "Dish" for permanent protection of this open space. I have spoken with several hundred people who enjoy these foothills, including Stanford students, their parents, faculty, staff, and community members primarily from the County and all around the area.

Most of them are unaware that the foothills in that area are currently not protected, and over and over again have expressed to me that they need this precious place to come to relieve the stress from demanding academic/work/family lives, and having this area to come to regularly is an integral part of their quality of life (in fact, most say it's right at the top of their list).

121-3 As a long-time County resident, I would thoroughly agree and express my thanks to you for doing whatever is within your power to recommend to the Planning Commission and County Board of Supervisors further study and much more stringent mitigation measures or alternatives in the final EIR (or if none can be found, simply scale back the project to a more reasonable level)--and to consider permanent protection of the Stanford Foothills west of Junipero Serra Blvd.

Sincerely,

Deborah Clark 457-10 Sierra Vista Ave. Mountain View, CA 94043 Dear Ms. Jones,

I am redirecting an email that was written to you by our Vice President of the Downtown North Neighborhood Association, Sally-Ann Rudd. I live around the corner from her home and strongly support her assessment of the traffic situation in our community. Ours is not a community of huge homes on very large lots, rather my living is only 6 yards from the street. When I am speaking on the telephone, my friends have asked if I am in a public phone because they can hear the heavy traffic that passes by. Besides the high volume of cars which commute down my street on their way to work, there is also the danger of the speed of the cars. Animals have been hit, vehicle accidents are frequent, and it is only a matter of time until a child or adult will be hurt or worse. We have been working towards traffic calming of the present situation, but I am very much afraid that with the continued extensive development of Stanford University, the situation will degrade even further. Please consider the ignored impact on our homes and families when you are looking at Stanford's request for further development.

Please do not further the present attitude of "Power and Money can get whatever it wants."

Thank you Katherine Abu-Romia 525 Hawthorne Ave. Palo Alto CA, 94301

>Dear Sarah, Members of the Santa Clara County Planning Commission,

>Re: Draft EIR/ Stanford University GUP, Section iv, Traffic and Circulation
>
>I am a resident of Palo Alto at 204 Cowper Street, which is on the north
>side of University Avenue, in the neighborhood referred to as "Downtown"

>side of University Avenue, in the neighborhood referred to as "Downtown North". >

>We have noticed a marked increase in cut-through traffic in our >neighborhood, a phenomenon borne out by a Traffic Study which was recently >completed by the City of Palo Alto Traffic Division. This Traffic Study, >carried out by a firm on independent traffic consultants, concluded that >up to 70% of trips on neighborhood streets during commute hours were from >cars cutting through our neighborhood, using it as a short cut between >Middlefield Road and Alma Street, Palo Alto.

>The volumes of cars comprising cut-through traffic were also considerable.
>As a result of this traffic, one of our neighborhood, residential streets
>was 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.

>Although it is outside the scope of our Downtown North traffic study, I >believe that the reason most people are cutting through our neighborhood

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>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. These
>cars originate either in the East Bay, or close to 101, exit 101 at Willow
>Road and cut through Palo Alto's residential streets to reach Alma. This
>is self-evident to anyone trying that same route at commute hours.
>There is no discussion in the EIR of the specific effects on Palo Alto's
>residential neighborhoods (specifically Downtown North) in the EIR, as a
>result of Stanford's development plans. There are vague statements such as
>there will be an increase in residential cut-through traffic. There is no
>consideration of how people who use 101 will reach the Stanford campus
>area to get to their jobs.
>Let me fill in the gap: they will be cutting through our neighborhood
>because the residential arterial streets in Palo Alto are already at
capacity!
>A discussion of commute routes from 101 to the Stanford Campus is a
>glaring omission from the EIR.
>Another glaring omission is any mechanism for compensating such
>neighborhoods for the damage caused by all this extra commute traffic. In
>the case of Downtown North, we think that Stanford University should pay
>for traffic calming or other mitigations since they are undoubtedly the
>major cause of traffic increases.
>Please consider these omissions when deciding to ratify the EIR. I think
>it is very detailed on 280 / Stanford Campus commute routes, but extremely
>thin when considering 101/ Stanford campus commute routes, which is where
>Downtown North is directly affected.
>Sincerely,
>Sally-Ann Rudd
>Vice President, Downtown North Neighborhood Association
>204 Cowper Street
>Palo Alto CA 94301-1205
>650 323-5920
>sarudd@best.com
```

Dear Ms. Jones,

I would like to thank you and the rest of the County staff for the opportunity to comment on the DEIR for Stanford's GUP/CP application. Let me begin by saying that I am quite glad that the County is recognizing the importance of the housing component of this project. Although the housing shortage in this area is by no means all Stanford's responsibility, Stanford is planning an aggressive campaign to help address it, especially for its own people. The County's support in this campaign is, of course, absolutely necessary.

Below, I have outlined a number of comments and concerns with the DEIR. I will begin with a few of very technical points.

- My first technical point is in reference to the cordon line discussed in traffic mitigation TR-5B (pp. 4.4-93 4.4-97 and Figure 4.4-16). Specifically, cordon intersection number 12 has been placed on Escondido Road, just north of Stanford Avenue. This placement 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 Escondido Elementary School, and, thus, the only campus access is along Olmstead Road. If the cordon is moved to Olmstead Road, just east of Escondido Road, all of the campus trips will continue to be counted, but the trips from the elementary school and day care facilities will not be counted.
- 123-2 The second technical point that I would like to bring up is that, in Figure 7.2, many of the proposed changes are mislabeled on the map. For instance, the proposed change of the Foothills District to Open Space and Field Research comes from alternative LU-C, rather than LU-A. This is only one of the areas mislabeled on this map.
- 123-3 Finally, on the technical aspects, the evaluation of the reduction in traffic due to moving 1200 graduate students on campus seems to be questionable. The net reduction in peak-hour trips found by moving 1200 graduate students onto campus was only 65 peak-hour trips per day. This seems to make the assumption 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.
- In addition to these technical points, I do have a number of more general comments on the DEIR. Most of these relate to the housing component of the DEIR. First, I am concerned that, of the graduate housing sites listed, the DEIR recommends that one (the Lower Knoll area, housing site J) be eliminated from consideration because of concerns about California Tiger Salamander habitat. This is a loss of a site for 200 graduate housing spaces. In addition to the Lower Knoll site, two of the

component alternatives discuss not allowing housing on the El Camino frontage of Escondido Village (housing site D). I am concerned that, although the impacts of building on housing site D can be mitigated (as per mitigation OS-4), this site may have some opposition to it from the local community. Given the loss of one housing site already, it will be very difficult for Stanford to build all 1900 graduate student units if more sites are taken off the table. I would strongly encourage the County to find that housing site D, with the proposed mitigation, is an appropriate site for graduate housing. Along the same lines, housing site I, as mitigated, should be recognized as an appropriate site for medical resident and post-doctorate housing.

- The remainder of my comments will be on the housing mitigation PH-3 and the other references to these housing triggers. As the triggers are currently worded, there are a number of problems with them. First of all, the triggers, especially for the faculty/staff housing, are based on the absolutely most ambitious end of the spectrum that Stanford has proposed. It is not clear that all of this housing will be able to be built, especially given the objections to certain housing sites and the densities at other sites. Even 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 the faculty/staff housing must be looked at very carefully, so that they are not unrealistic, given Stanford's proposal.
- A second problem with the triggers as they are currently worded is that they assume that every housing site that is proposed will be available. In light of the concerns about CTS habitat on the Stable Site, as well as other housing sites, this assumption is probably 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.
- The final problem with the triggers as they are currently worded is that they will actually encourage people to oppose housing projects, either through the County's appeal process, through lawsuits, or both. Because the triggers hold Stanford responsible that the construction of the housing be completed for the academic space to be allowed, if a member of the community can hold up a housing project, they will be able to hold up a considerable amount of academic space, as well. For instance, if a lawsuit over a graduate housing project of 500 units is held up, roughly 500,000 square feet of academic space will have to be put on hold until the lawsuit is resolved. This would give the community an enormous lever to stop academic development, and it will make members of the community actually more likely to hold up the housing projects.

The solution for this problem lies in holding Stanford accountable for what Stanford has control over and not holding Stanford accountable for

things that Stanford cannot control. Stanford certainly can control their application for the project, and it can control the funding for projects. It can also, to some extent, control the construction time-line. Stanford cannot control some types of construction delays, such as weather delays and the like. Stanford also cannot control either the County's approval process or any lawsuits that might be filed against Stanford. As long as Stanford is acting in good faith in their applications, construction of academic space should not be delayed because of housing delays outside of Stanford's control.

123 -8

One way to do this would be to require Stanford to apply for the housing and to show that it has the funding for the housing. Delays caused by lawsuits or appeals in the housing application should not cause the triggers to hold up academic space, however, unless the Board of Supervisors (or whatever agency would be most appropriate) rules that Stanford is at fault for the delays. Construction delays could be treated similarly. If the construction falls off schedule because of something outside of Stanford's control, the triggers should not take effect. If the delays are under Stanford's control, then the triggers should be able to take effect. By holding Stanford accountable only for what Stanford can control, the incentive for members of the community to hold up housing in order to delay academic construction would be removed.

Triggers such as these are an essentially untried method for assuring that Stanford will construct these housing units. If the County is going to use this method, both for Stanford and for other entities in the future, it must make sure that the triggers will not have any unintended consequences. Making these proposed changes to the triggers will go a long way to accomplishing this goal.

I would again like to thank you for this opportunity to address these issues, and I look forward to the response in the final EIR.

Sincerely,

Chris Stromberg Graduate Student Stanford University 408 288 9198 ;

TEL:510 835 4855 Aug-14-00 10:30AM;

Letter 124

State of California

RECEIVED PLANE OF THE Resources Agency

Date: August 7, 2000

Phone 4

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MEMORANDUM

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To:

Project Coordinator

Resources Agency

Ms. Sarah Jones, Associate Planner Santa Clara County Planning Office 70 West Hedding Street, East Wing,

San Jose, CA 95110

From:

Department of Conservation

Office of Governmental and Environmental Relations

Draft Environmental Impact Report (DEIR) for the Community Plan and

General Use Permit Application, Stanford University Campus, Palo Alto.

Santa Clara County - SCH #999112107

The California Department of Conservation's Division of Mines and Geology (Division) has reviewed the geology and seismology issues of the DEIR for Draft Community Plan. The Division studies and prepares maps and reports for land use planners on geologic hazards in California. We offer the following comments on Section 4.6 of the DEIR with respect to the geologic hazards of liquefaction and strong earthquake ground motion.

124 -1 Section 4.6 does not state what the earthquake ground motion for the plan area is predicted to be. The document does include a description of the Modified Mercalli Scale (Table 4.6-2), but the Mercalli Scale is not a factor for the engineering calculations required in the Uniform Building Code and otherwise has no value for structural design. We therefore recommend that it be replaced with specifically calculated ground motion.

> The ground motion for the Design Basis Earthquake (DBE) (which we estimate to be Peak Ground Acceleration of PGA_{DBE} = 0.79g) can be roughly correlated with the descriptive shaking terms of the Modifed Mercalli Scale. This can be done using the formula published in the August 1999 issue of EERI Earthquake Spectra (v. 15, no. 3, by Wald, Quitoriano, Heaton, and Kanamori). In general, PGAs in the realm of 0.65g to 1.16g are correlated with a Modified Mercalli Index of MMI ™ IX. (Note that the DEIR reports a MMI of VIII. We believe that this should be corrected to a MMI of IX.)

2. The earthquake ground motion for the Stanford campus is high because of the 124 -2 active faults on both sides of the San Francisco Peninsula. About 6.7 km southwest is the San Andreas Fauit, with maximum moment magnitude Mmax ≅ 7.2 Mw and ♣

t By: SANTA CLARA COUNTY PLANNING;

408 288 9198 ;

Ms. Sarah Jones August 7, 2000 Page 2

slip-rate of 17[±]4 mm/year (Reference: Working Group on California Earthquake Probabilities, 1999, Earthquake Probabilities in the San Francisco Bay Region: 2000-2030, U.S. Geological Survey (USGS) Open-File Report 99-517, 36 pages). This segment of the San Andreas Fault is a 1997 UBC Type "A" seismogenic source (refer to Table 16-U of 1997 UBC), and has a 21 percent chance of an earthquake before the year 2030.

- 124-3 3. For seismically induced liquefaction and strong ground motion, it is suggested that the Stanford University Community Plan refer to the Division's Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 74 pages, 1997. This document can be downloaded from our website at www.consrv.ca.gov/dmg.
- 124 -4 4. The Stanford campus is subject to high earthquake ground motion at the following two levels:

As noted above, Peak Ground Acceleration, PGA ≅ 0.79g for the DBE, 10 percent chance of exceedance in 50 years, with a statistical return period of 475 years. This applies to private residences and commercial buildings. The term is from Chapter 16 of the 1997 Uniform Building Code, Sections 1627, 1629.1 and 1631.2.

Peak Ground Acceleration, PGA \cong 1.02g for the Upper-Bound Earthquake (UBE), 10 percent chance of exceedance in 100 years, with a statistical return period of 949 years. This applies to public schools, hospitals (notably the Stanford Hospital), and essential services buildings. The term is from California Code of Regulations, Title 24, 1998 California Building Code, Section 1631.2.6.

The draft text does not use the correct terminology from building code regarding levels of earthquake ground motion. The UBE ground motion applies to the Stanford Hospital because it is under permit from OSHPD, not Santa Clara County. The Hospital is required to meet the same design requirements for earthquake ground motion, as are public schools of the Peninsula. Therefore, the DEIR should be clear (relying on proper code citations) that PGA 1.02g, not PGA 0.79g will be used for design of the Hospital.

- 124 -5 5. Please note that the DEIR uses antiquated seismological terms (example: maximum "credible" earthquake). Please refer to the Uniform Building Code for the correct terminology to be used in the final EIR.
- 124-6 6. The problem of liquefaction on the Stanford campus needs to be adequately quantified. Campus buildings will suffer vertical settlements (total and differential)

AUG. -14' 00 (MON) 09:54

PARSONS ENGINEERING SCIENCE

408 288 9198 ;

TEL:510 835 4855 Aug-14-00 10:31AM;

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Ms. Sarah Jones August 7, 2000 Page 3

IT BY: SANTA CLARA COUNTY PLANNING;

during a seismically-induced event that includes liquefaction. We refer you to Chapter 5 of the Division's Special Publication 117 with respect to liquefaction assessments.

In summary, we disagree 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. We recommend 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.

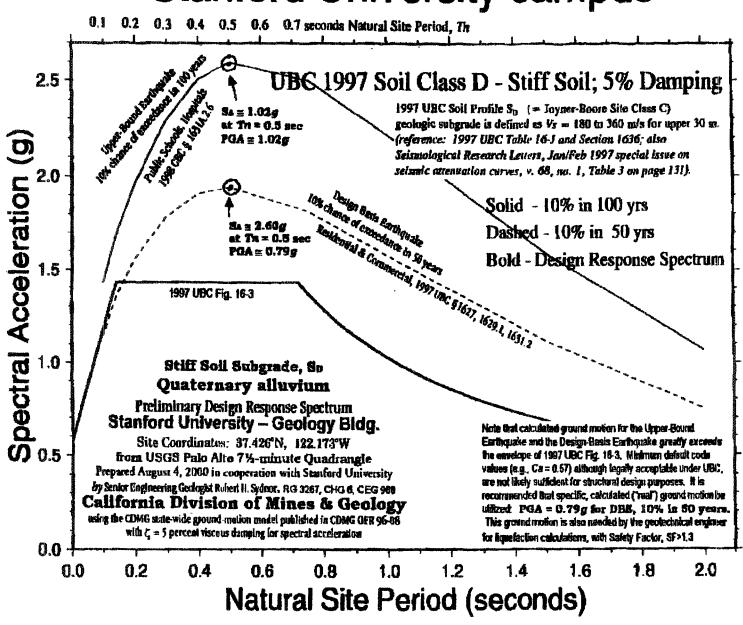
Thank you for the opportunity to review and comment on the DEIR. If you have questions on our comments, or required technical assistance or information on geologic hazards, please contact Division Senior Engineering Geologist Robert H. Sydnor:at (916) 323-4399. You may also call me at (916) 445-8733.

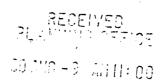
Lason Marshall
Assistant Director

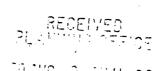
Attachment

cc: Robert H. Sydnor

Stanford University campus









V oilaforative affort between Bay Area Action and the vary of Palo Alto

RAY AREA ACTION 715 COLORADO AVENUE, SUITE 1 PALO ALTO, CALIFORNIA 94303-3

TELEPHONE 550.321.1994 F4X 650.321.1995

EMAIL BAACTIONING ORG WWW.BAACTION.ORG/ARASTRADEP

August 5, 2000

Ms. Sarah Jones, Planner County of Santa Clara Planning Office 70 W. Hedding St. E. Wing 7th Floor San Jose, CA 95110

RE: Stanford Community Plan, General Use Permit and Draft EIR

Dear Ms. Jones,

Due to the significant environmental impacts identified in the draft Environmental Impact Report for Stanford University's General Use Permit application I believe the County should exercise their full authority in regulating the proposed developments.

Specifically the County should:

- 1. Reduce the total square footage of development allowed under this permit. 125 -1
- 125 -2 2. Require long-term (25 year minimum) or permanent dedication of open space.
- 125 -3 3. Withhold determination on the Carneige Institute application until the GUP/CP are completed.
- 125 -4 4. Require dedication of public trail easements through the Stanford foothills, connecting the core campus to the Arastradero Preserve. These trail corridors would serve both recreational and commute purposes, possible serving as mitigation for the unavoidable traffic impacts.
- 5. Ensure that the housing components include affordable (as distinct from below market rate) 125 -5 units made available to Stanford and other local service employees (teachers, fire fighters, nonprofit employees, etc.)
- 6. Require specific traffic demand management programs, including no net new trips, intersection 125 -6 mitigation money, residential impact study and avoidance plans, improvements to regional bicycle commute corridors including #4 above.
- 125 -7 Change 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. This should include a legally binding Open Space, Research and Academic reserve zoning designation.
- 125 -8 8 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.
- 125 -9 9. Require full compliance with Federal and State laws protecting species such as the Tiger

Salamander and Red-legged frog. Current plans to replace Tiger Salamander habitat need to be carefully evaluated, and should include a component to require successful relocation <u>prior to</u> removing habitat at Lake Lagunita

- 125 -10 10. Extend the open space mitigation aspects to include all Stanford foothills property, including current agriculture and grazing leases.
- 125-11 II. Require the University to engage in a foothills master planning process prior to changes in policies regarding public access. The master plan should include inventory and analysis of all biological resources, trails and public access issues.
- 125-12 Over the past several decades the County has not done a sufficient job requiring mitigation for the growth of Stanford University. As an alumni, and land manager on adjacent property, I believe the University should be held to the same standards as any County applicant. The significant impacts of the proposed general use permit, and the long-term impacts of Stanford growth on surrounding communities must be taken into consideration during review of this draft EIR. The County should be aware that they can say no to this permit and require a more thoroughly mitigated proposal to be put forth. Alternatively the County can work with the University to ensure that the mitigations for the current proposal adequately address community concerns and protect the integrity of our local ecosystems and ensure a high quality of life for current and future generations.

Sincerely.

David T. Smernoff, Ph.D.

Project Director

Class of 1993

MARY DAVEY
12645 LA CRESTA DRIVE OL MARTINET
LOS ALTOS HILLS, CALIFORNIA 94022-2512

Juguet 6, 2000

Sara Jones
Planning Dept.
Shuta Clara Charaty
Government Center
East Wing, 7th floor
To W. Hedding St., San Jos

Sara

126 -1

The Draft EIR talks much about The impact for all propose development— happie. It possible to teace out The impact/mitigation for all The Bord honsing units only? What happie, etc.

Maulis,

Mary Daney

Environmental Services Agency



Planning and Building Division

County of San Mateo

Mail Drop PLN122 - 455 County Center - 2nd Floor - Redwood City California 94063 - Telephone 650/363-4161 - Fax 650/363-4849

Board of Supervisors
Rose Jacobs Gloson
Richard S. Gordon

Richard S. Gordon Mary Griffin Jerry Hill Michael D. Nevin

Planning Administrator Terry L. Burnes

August 9, 2000

Sarah Jones Santa Clara County Planning Department 70 West Hedding Street East Wing, 7th Floor San Jose, CA 95110

Dear Sarah:

SUBJECT: Stanford Community Plan DEIR

I apologize for not responding sooner concerning the Draft EIR for the Stanford Community Plan. The cumulative impact analysis fails to account for two projects in San Mateo County that might be relevant:

- The Hewlett Foundation headquarters office building on the Buck Estate at the southwest corner of Sand Hill Road and Santa Cruz Avenue. The Planning Commission recently approved a use permit for this project. We expect construction to proceed within the next six months or so.
- 2. The Chargin office project at the northwest corner of Sand Hill Road and Santa Cruz Avenue. This involves a general plan and zoning amendment from residential to office commercial. We recently circulated a negative declaration for review. The future of this proposal is less certain, as it requires hearings and approvals by the Planning Commission and Board of Supervisors and there seems to be considerable opposition.

You may obtain information about both of the above projects from David Holbrook, project planner, at 650-363-1837.

In addition, Stanford has proposed some minor improvements to facilities at Jasper Ridge (contact Damon DiDonato, project planner, at 650-363-1852).

Sincerely

Terry Burnes

Planning Administrator

TB:kd

11bk 1207_km.doc

ce:

David Holbrook Damon DiDonato



PALO ALTO UNIFIED SCHOOL DISTRICT

25 Churchill Avenue • Palo Alto, CA 94306 Telephone: (650) 329-3737 • FAX: (650) 321-3810

OFFICE OF THE SUPERINTENDENT

September 15, 2000

Santa Clara County Department of Planning and Development 70 West Hedding Street San Jose, CA 95110

RE:

Stanford University Draft Community Plan and General Use Permit Application Draft Environmental Impact Report State Clearing Housing Number 1999112107

Dear Ladies & Gentlemen:

On August 7, 2000, the Palo Alto Unified School District submitted to you a letter commenting on the above-referenced EIR. PAUSD and Stanford University have reached an agreement that mitigates in full the impacts of the General Use Permit on PAUSD. Therefore, PAUSD withdraws the August 7th letter.

PAUSD proposes the following corrections to the DEIR:

- 1. Correct the information in Table 4.10-1 per the August 7, 2000 letter to reflect that it is year 2003 projections.
- 2. Correct the date of the Lapkoff and Gobalet study on page 4.10-16 to September 28, 1999.
- 3. Correct the last partial paragraph on page 4.10-17 as noted below:

Projected enrollment through 2010 under the District's Medium forecast is 5,082 for elementary schools, 2,680 for middle schools, and 4,202 for high schools, or 11,985 students total. (delete next sentence in original test: "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.") Enrollments are expected to peak between 2010 and 2011. The addition of 239 to 584 students from planned University housing will increase total enrollment by 2.0 to 4.9 percent by 2010. Enrollment projections...

 Correct the statement that the Stanford/PAUSD agreement will replace school impact fees to be paid by Stanford. The agreement with Stanford provides that it will pay school impact fees. County Planning Department September 15, 2000 Page 2

Thank you for your consideration of these matters.

Regards,

Donald A. Phillips, Ed.D. Superintendent of Schools

DAP/ldw

cc: PAUSD Board of Education Larry Horton, Stanford University



STANFORD UNIVERSITY UNIVERSITY ARCHITECT/PLANNING OFFICE

September 27, 2000

Sarah Jones
Santa Clara County Department of Planning & Development
County Government Center, East Wing
70 West Hedding Street
San Jose, CA 95110

Subject:

Possible golf course reconfiguration

Dear Ms. Jones:

The purpose of this letter is to describe how we intend to conduct reconfiguration of the golf course. You have received a map showing a possible configuration, but you should also know the following:

- 1) The concrete instream crossing will be removed during the dry season only, so as to not affect the steelhead or red-legged frog during the rainy season.
- 2) Stanford will retain a qualified biologist to conduct focused surveys for specialstatus plants in the proposed construction zone.
- 3) The project will be designed to provide, to the extent feasible, an exclusionary buffer zone from any special-status plant resources that are discovered (a minimum 30-feet buffer).
- 4) If any special-status plants cannot be avoided, Stanford will submit a site-specific mitigation and compensation program for the affected resources, in consultation with CDFG and/or USFWS.
- Any special-status plants within the construction zone will be transplanted on Stanford lands in consultation with the CDFG and USFWS. Lost plant habitat will be replaced at a ratio of 2 acres of replacement habitat for each acre of special-status plant habitat lost.
- 6) If mitigation sites are developed, Stanford will provide funding for the County to retain a qualified biologist to monitor the sites for 5 years, using success criteria developed in coordination with the CDFG and USFWS. The success of the transplantation program will be considered to have been achieved if 80% or more of the transplanted plants have survived 5 years after transplantation.
- Stanford will provide funding for the County to retain a qualified biologist to conduct pre-construction surveys for breeding raptors and migratory birds to determine the location of active nest sites. If active nest sites are located, Stanford will consult with the CDFG to determine appropriate construction setbacks from the nest sites. No construction activities will occur within the construction setback during the nesting season of the affected species.

- Stanford will compensate for the net loss of oak woodland and riparian oak woodland habitat through the creation or restoration and long-term preservation of comparable habitat. Restoration of oak woodland habitat will be conducted at a ratio of at least 1.5:1. A restoration plan will be prepared and implemented if the project would result in a loss of oak woodland or riparian oak woodland habitat. Restoration design, compensation ratios, and monitoring requirement will be determined in consultation with CDFG to ensure that comparable habitat values are attained in the replacement habitat.
- 9) The golf course reconfiguration project will be sited and designed to minimize the loss of trees protected by the Santa Clara tree preservation ordinance.
- 10) If protected trees will be removed or impacted by project activities, Stanford will implement the construction management practices and tree replacement requirements set forth in the County's tree ordinance. The replacement ratio will be 3:1 for oaks and 1:1 for other protected trees, or
- Stanford may submit a Vegetation Management Plan to the County Planning Office for acceptance, which provides the same or greater level of tree replacement as that required by the County's tree ordinance.
- Prior to application for the golf course reconfiguration project, Stanford will retain a qualified biologist to conduct a delineation of potential jurisdictional wetlands and other waters of the U.S. present on the site.
- 13) The project will be sited and designed to minimize impacts to jurisdictional wetlands and other waters of the U.S.
- If jurisdictional wetlands or other waters of the U.S. will be unavoidably lost as a result of project activities, Stanford will 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 the golf course reconfiguration project will 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.

Please call me if you have any questions.

Sincerely,

David J. Neuman
University Architect and

Associate Vice Provost for Planning

CC:

Ted Leland Jeff Wachtel

COUNTY OF SANTA CLARA COUNTY PLANNING COMMISSION HEARING MINUTES STANFORD CP/GUP DRAFT EIR AUGUST 3, 2000



RECONVENE

The meeting was called to order by Secretary Lopez at 6:45 P.M. in the City of Palo Alto Council Chambers, 250 Hamilton Avenue, Palo Alto.

ATTENDANCE

COMMISSIONERS PRESENT TRUMBULL, PETERSON, BOHAN, BARKE, VOSS

ACTING DIRECTOR, ERA PAUL ROMERO

PLANNING DIRECTOR ANN DRAPER

PLANNING SECRETARY MICHAEL M.LOPEZ

RECORDING SECRETARY BARBARA V. LASKIN

ADVISORY STAFF HUGH GRAHAM, PRINCIPAL PLANNER

SARAH JONES, ASSOCIATE PLANNER

LIZANNE REYNOLDS, DEP. COUNTY COUNSEL

GARY RUDHOLM, ASA SECRETARY

5. 7165-07-81-99EIR-99GP-99P - STANFORD UNIVERSITY

Public hearing to accept comments on the Draft Environmental Impact Report for Stanford University Community Plan and General Use Permit. Location: Stanford University Lands in unincorporated Santa Clara County. Zoning: A1, A1-20s and R1E-10. Supervisorial District: 5.

Secretary Lopez introduced the item and turned the meeting over to Chairman Bohan. Chairman Bohan announced that the purpose of the meeting was to discuss comments on the Draft Environmental Impact Report (DEIR) on the Stanford University Community Plan and General Use Permit. He requested that testimony be limited to comments on the DEIR only and that there would be no discussion about the project itself. Due to the large number of people who wished to speak, Chairman Bohan announced that groups would be limited to five minutes and individuals to three minutes of time. He also asked everyone to respect the time limit. He said that group representatives would speak first. Chairman Bohan welcomed everyone and stated he

was pleased to see such a good turnout. He reiterated that comments should be limited to the DEIR itself and that comments on the project would be heard September 7, 2000. Chairman Bohan then acknowledged the presence of Kristina Loquist, chief of staff for Supervisor Simitian, and representatives of Stanford University.

Sarah Jones, the project planner, gave a brief presentation regarding the draft report and some of the issues. She said the purpose of this meeting was to take testimony on the draft Environmental Impact Report (EIR). Ms. Jones said this General Use Permit was submitted in November 1999, and that this was the first of several hearings set to culminate in October this year. Ms. Jones stated that written comments on the report would be received and noted until 5:00 P.M. August 7 and that the final EIR would address those issues.

She said she wanted to clarify the issue about the golf course. The proposed project, she said, includes housing on the existing Hole One of the golf course. Ms. Jones stated that the draft EIR included an alternative in response to concerns about other housing sites which involved housing development on the golf course holes two through seven; however, this alternative was found to not be desirable. She said she could answer any questions anyone might have or move to testimony.

Chairman Bohan opened the public hearing at 6:50 P.M.

Secretary Lopez indicated that he would be announcing prospective speakers who had completed speaker cards. He repeated the time limitations established by Chairman Bohan and reminded speakers that testimony should focus on the draft EIR. Testimony by speakers proceeded as follows:

Walter Hays, Peninsula Conservation Center Foundation, was concerned about the following:

- 1. open space he agreed with the report stating that academic growth boundary should be modified;
- 2. Transportation traffic impacts. He felt there should be no net increase in commuter trips;
- 3. Housing He addressed the amount of housing for faculty and students and the new jobs created by the plan.

Laura Stuchinsky, Silicon Valley Manufacturing Group and the Housing Action Coalition, said she supported higher density housing on campus because more campus housing will reduce traffic.

Mark Sabin, Palo Alto Chamber of Commerce and the Government Action Council, expressed his concern about the conservation of sensitive biological resources and the impact of diminished public service to people in the community.

Roger Smith, President, Men's Section, Stanford Golf Club, commented that there is no indication in the study of other alternatives particularly with respect to high density housing. Mr. Smith stated that the Men's Club wanted to keep the course in its present status and configuration, designated as an open space.

Tom Jordan, Committee for Green Foothills, said that (1) the population cap on Stanford is between 34,000 to 36,000, and that the General Plan must indicate the population density; (2) the zoning is not sufficient and does not indicate where the density will be; (3) academic growth boundary is A-1 and A-120 zone and that is the line that should have been studied. Stanford did not indicate why it was not included; (4) the General Plan does not define open space or space for research; (5) alternative project insufficient; (6) doesn't mitigate school development.

Mary-Lee Kimber, Stanford Graduate Student Council, stated their concern was more affordable housing. She said there was a personal side regarding the quality of life for graduate students and where they will spend their life.

Pria Graves, College Terrace Residents Association, stated she lived in an area most impacted by the Stanford development and the traffic was not accurately predicted, particularly parking and circulation. She was also concerned about the loss of wildlife and flooding.

Peter Drekmeier, Stanford Open Space Alliance, expressed concern about the red legged frog, the tiger salamander and wildlife habitat. He stated that Stanford should concentrate on higher density with new development later on. Mr. Drekmeier added that the golf course should be protected in perpetuity and that housing should be affordable for Stanford staff and students.

Sally Probst, League of Women Voters of Palo Alto, stated the concern should be affordable housing, reduction of traffic congestion and on-campus childcare. She said she supported dialogue between the University and the Palo Alto School District.

Betty Koski, Stanford Women's Golf Club, said the University should stay with the current plan utilizing the principle of high-density housing within the core campus.

Gerry Plunkett, Stanford Women's Golf Club, stated she neither supported the proposal from open space to academic campus nor did she support housing on Hole One. she said this area is unique and should not be altered in any way.

Jan LaFetra, Stanford Women's Golf Club, said Hole One should be not redesigned and that housing will introduce more litter and traffic.

Diana Sworakowski, Stanford Women's Golf Club, stated that the golf course was an example of a work of art and that removal of the first hole would remove the integrity of the other holes. She suggested the University consider other alternatives and a more intensive use of present facilities.

Mary Shaw, Stanford Women's Golf Club, asked that the golf course not be destroyed because it is a treasure for students, alumni and the community.

Louis Spain, Stanford Women's Golf Club, did not appear when called.

Hank Lawrence stated that Stanford is a city that has not created an infrastructure with enough roads. He said the university will continue to grow and it must have a balanced infrastructure.

Archie Robinson, Committee to Save Stanford Golf Course, said while he was sympathetic to the university, the question was whether or not the DEIR betrayed modern urban principles and that the golf course should not be treated lightly because of its historical significance.

Eric Jones, Committee to Save Stanford Golf Course, commented on the historical significance of the course. He said it was the creative work of a unique individual and moving Hole One would destroy the habitat for the tiger salamander.

Dr. Lyman Van Slyke, Committee to Save Stanford Golf Course, said he supported much of the plan except for moving Hole One of the golf course. Dr. Van Slyke stated that (1) the golf course preserves two endangered species, the tiger salamander and the red legged frog; (2) the DEIR does not fully realize the environmental damage that will occur to the site.

Mark Harrison, Committee to Save Stanford Golf Course, asked the Commission to make the right choice. He said removal of Hole One will require reworking the other holes and, there are heritage oak trees, so there could be a loss of trees.

Walter Stewart, Committee to Save Stanford Golf Course, said that growth should not be at the expense of the golf course. He said the University could not continue spiraling growth and that it should make better use of the land by proposing fixed development within a core area.

Robert Hoover, East Palo Alto Junior Golf Program, said the Stanford course was a championship golf course and it was a wonderful opportunity for young people to play on a course of this kind. This program accelerated their progress to compete because it emphasized personal development.

Rick Stultz, Committee to Save Stanford Golf Course, yielded to the following speaker.

Rich Berra, Committee to Save Stanford Golf Course, yielded to the next speaker.

Rich Harris, Committee to Save Stanford Golf Course, stated that the university is badly served by its planners who should know the difference between its shrine and its parking lots. He said it was the job of the community to help Stanford focus on infill development on the transportation corridors.

Larry Taylor resident of Palo Alto, stated that the DEIR addresses the negative impact of housing while it ignores putting residents where they work.

Stan Christensen, said that the County has the negotiating ability for permanent open space. He said the alternatives presented were lacking.

Edward Roger Holland stated that uncontrolled growth causes problems and that transportation to the campus is needed.

Gordon Newell, stated he supported research and education and cautioned about losing the opportunity to bring in younger faculty members and graduate students.

Ken Imatani, did not speak, but submitted written comments stating his disappointment that the Stanford plan called for building housing on the golf course rather than other sites.

Jeffrey Segall expressed concern about graduate student housing. He said the EIR states there are no significant impacts on adjacent lands but that golf course could not serve as a buffer if it is relocated.

Paul Lomio stated the university generated 50% of the traffic in College Terrace and this would increase. He requested a traffic study of the impact on their neighborhood.

Kathy Durham expressed her concern about increased traffic between the College Terrace neighborhood and the Stanford campus. She said the report did not include monitoring speed. Ms. Durham said there has been increased traffic volumes not included in the DEIR. She stated

it was important the County address the specific mitigation of no net increase in commute trips. Ms. Durham said she would submit written comments.

Paul Hartke, a graduate student, commented that there were no easy answers to a complex issue. His concern was housing for graduate students.

Lynn Orr, Dean of the School of Earth Science, stated that the DEIR deals with complex issues and mitigations for housing should reflect any restrictions placed on the sites. She said there are no restrictions to prevent Stanford from completing the plan.

Neil Struthers, the Santa Clara and San Benito County Building and Construction Trades Building Council, said he believed Stanford has addressed community concerns in that the academic growth boundary goes above and beyond.

Dennis Reinhardt, Sand Hill Enterprises, stated he sought a solution, a win-win alternative. He suggested considering the arboretum and that was only one possible infill opportunity.

Mary Davey spoke both as an individual and as a member of the Mid Peninsula Regional Open Space District. She said it was important that the County adhere to the Palo Alto urban service boundary along Junipero Serra and that there should be no development beyond this boundary, particularly on the golf course. Ms. Davey stated that the foothills should be a prominent regional asset for the community, that new housing should be built within the core campus with the village concept in mind. She added that there should be no net new commute trips and that housing should come before anything else.

Edie Keating said that Stanford should be given the opportunity to be creative in order to protect the community from too much development. In addition, she said:

- 1. There should be no net commute trips
- 2. Stanford should reduce new parking, no surface parking but parking structures
- 3. Stanford should reduce the project
- 4. Stanford should preserve habitat on the core campus
- 5. Stanford should respect Palo Alto's urban growth boundary
- 6. Stanford should look to options that protect the foothills permanently

Stanley Peters, resident of Menlo Park and a member of the Stanford faculty, stated that the inevitable impacts were modest and the social cost was small. He thought the plan should be emulated and that the County should accept the DEIR and the Stanford Community Plan.

Kathleen Much said that Stanford has been responsible in its planning more than any other employer. She said that housing is in the central campus in an infill area in response to graduate and faculty needs and that development will not destroy the foothills.

Robert Augsburger said that there should be linkage with respect to housing and that the mitigation in the DEIR is inadequate because more housing is needed.

Christopher Stromberg, a graduate student, stated that the County should be careful regarding the required housing. He said the requirements must be workable because tying academic building to housing could cause difficulty. Ms. Stromberg added that the chosen sites are critical but that alternative sites should be considered.

Jack Bunzel did not respond when his name was called.

Herb Borock expressed concern about the location of the golf course and protection of the open space.

Tom Wyman commented there were serious energy shortages, such as water from the Hetch Hetche, and that further development will drain those resources.

Nick Spaeth stated his support of the plan. He said Stanford has done what no one else has done and that everyone should appreciate the needs of the university.

Matthew Lacey, graduate student, stated that the golf course provided solace on the campus, it was a place to bring friends and meet new people where you could learn a new game that will last a lifetime.

Gail Sredanovic commented on transportation and housing, saying there was no place for retired professors to live, and that the Use Permit should be consistent with community standards.

Jill Clay did not speak, however, she did submit written comments expressing her sympathy with graduate students need for housing and noted that it was irresponsible of a university to accept money from students it could not house.

Cal Lindell was not present when his name was called.

Jeannie Siegman, a campus resident, stated that it was good that the stakeholders were trying to find solutions to the traffic problems.

Hunter Tart stated that he supported student-housing alternatives because construction will affect lines of sight and will displace some species. He favored all six sites of proposed graduate housing.

Noting that there were no more speakers, Chairman Bohan thanked everyone for their participation and reminded everyone present that comments could be submitted in writing until 5:00 PM. August 7, 2000. The meeting was adjourned at 9:40 P.M.