

CHAPTER 1

Introduction

1.1 Purpose of the Response to Comments Document

Stanford University (Stanford) has applied for a new General Use Permit governing development on its lands in unincorporated Santa Clara County. The proposed General Use Permit would authorize an additional increment of campus growth and land use development, anticipated to take place over a period that would extend from approximately 2018 through 2035. Stanford seeks County approval of the proposed General Use Permit and related amendments to the Stanford Community Plan and County Zoning Map. For ease of reference, all of these approvals are collectively referred to as the “2018 General Use Permit” or the “Project” in this EIR.

The County of Santa Clara, as lead agency responsible for the environmental review for private development projects in unincorporated Santa Clara County, determined that, under the California Environmental Quality Act (CEQA), an EIR is required for the proposed Project. CEQA requires that before a decision can be made to approve a project with significant environmental effects, an EIR must be prepared that fully describes the significant environmental effects of the project. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate environmental consequences of a proposed Project, and to identify feasible alternatives or mitigation measures to avoid or substantially lessen significant adverse impacts. The information contained in the EIR is reviewed and considered by the lead agency prior to the decision on whether to approve the proposed Project.

As described in greater detail under Section 1.2, Environmental Review Process, below, the County published a Draft EIR on the proposed Project on October 6, 2017, and the public review period for that document ended on February 2, 2018. The County published Recirculated Portions of Draft EIR on the proposed Project on June 12, 2018, and the public review period for that document ended on July 26, 2018. The Draft EIR and Recirculated Portions of Draft EIR, as revised (see consolidated Draft EIR in Part 1 of this Final EIR), together with this Response to Comments Document (Part 2 of this Final EIR), and appendices to these documents – see Section 1.2.4, below, constitute the Final EIR for the proposed Project in fulfillment of requirements of CEQA and consistent with CEQA Guidelines Section 15132. The Final EIR will be considered by decision-makers before deciding whether to approve the Project and reflects the Lead Agency’s independent judgment and analysis of the physical impacts of the Project on the environment (CEQA Guidelines, Section 15090).

This Response to Comments Document provides written responses to comments received during the public review periods for the Draft EIR and Recirculated Portions of Draft EIR. It contains a

list of agencies, organizations and persons that commented on the Draft EIR and Recirculated Portions of Draft EIR; copies of comments received on the Draft EIR and the Recirculated Portions of Draft EIR; and written responses to those comments. It also contains revisions to the Draft EIR and Recirculated Portions of Draft EIR to clarify or correct information in the Draft EIR and Recirculated Portions of Draft EIR. Section 1.3, Method of Organization, below, provides a description of the overall contents and organization of this Response to Comments Document.

1.2 Environmental Review Process

1.2.1 Notice of Preparation and Public Scoping

On January 10, 2017, the County of Santa Clara, as Lead Agency responsible for the EIR, sent a Notice of Preparation (NOP) to governmental agencies, organizations, and persons interested in the proposed Project to initiate the public scoping period for this EIR, which ended on February 17, 2017.¹ The NOP was included in Appendix NOP of the Draft EIR, and also in this Final EIR. The County also held a public scoping meeting at the Palo Alto Arts Center Auditorium in Palo Alto on February 8, 2017 to receive oral comments on the scope of the EIR. The comments received in response to the NOP, both written and oral, were included in Appendix NOP of the Draft EIR, and also in this Final EIR.

1.2.2 Draft EIR Public Review

On October 6, 2017, the County of Santa Clara released for public review the Draft EIR on the proposed 2018 General Use Permit. A 120-day public review and comment period on the Draft EIR began on October 6, 2017 and closed on February 2, 2018. During the public review, the County received 19 comment letters from governmental agencies, 13 comment letters from organizations, and 184 comment letters from individuals. The County also held five public meetings to receive oral public comment on the Draft EIR:

- Santa Clara County public meeting held at Palo Alto City Hall on October 12, 2017;
- Santa Clara County public meeting held at Palo Alto City Hall on October 19, 2017;
- Menlo Park City Council meeting held at Menlo Park City Hall on November 15, 2017;
- Santa Clara County Planning Commission Meeting held at Palo Alto Arts Center Auditorium on November 30, 2017; and
- Santa Clara County public meeting held at Palo City Alto City Hall on January 23, 2018.

¹ It should be noted certain public agencies requested and were granted an extension to the deadline, including the City of Palo Alto, City of Menlo Park, and the Palo Alto Unified School District.

1.2.3 Recirculated Portions of Draft EIR and Public Review

On June 12, 2018, the County of Santa Clara released for public review the Recirculated Portions of Draft EIR on the proposed 2018 General Use Permit. A 45-day public review and comment period on the Recirculated Portions of Draft EIR began on June 12, 2018 and closed on July 26, 2018. During the public review, the County received eight comment letters from governmental agencies, three comment letters from organizations, and 38 comment letters from individuals. The County also held two public meetings to receive oral public comment on the Recirculated Portions of Draft EIR:

- Menlo Park City Hall on June 27, 2018; and
- Palo Alto Arts Center Auditorium on July 10, 2018.

1.2.4 Final EIR: Consolidated Draft EIR and Response to Comments Document

This Final EIR consists of two parts (Parts 1 and 2):

- Part 1 of this Final EIR is a consolidated Draft EIR that integrates the Draft EIR and the Recirculated Portions of Draft EIR, incorporates staff-initiated changes and revisions made in response to comments that were received on the Draft EIR and the Recirculated Portions of Draft EIR; and includes associated appendices.
- Part 2 of this Final EIR consists of this Response to Comments Document, as described under Section 1.1, above, and Section 1.3, below; and includes associated appendices.

The County of Santa Clara Planning Commission will hold an advisory public hearing on the adequacy of the Final EIR and whether to approve the Project, following which the County of Santa Clara Board of Supervisors will hold a public hearing to consider whether to certify the Final EIR as complying with the requirements of CEQA, and whether to approve the Project. The County will provide a copy of comment responses to all agencies that submitted comments on the Draft EIR and Recirculated Portions of the Draft EIR at least 10 days prior to the Planning Commission hearing on the Final EIR (CEQA Guidelines, Section 15088(b)).

The County Board of Supervisors must certify the Final EIR before deciding whether to approve the Project. Prior to approval of a project for which the EIR identifies significant environmental effects, CEQA requires the adoption of Findings of Fact (CEQA Guidelines, Sections 15091 and 15092). If the Findings of Fact identify significant adverse impacts that cannot be avoided or substantially lessened, the County must adopt a statement of overriding considerations for those impacts (CEQA Guidelines, Section 15093(b)).

1.3 Method of Organization

This Response to Comments Document is organized as follows:

- Chapter 1, *Introduction*, describes the purpose of the Response to Comments Document, the environmental review process, and the organization of this document.
- Chapter 2, *Revisions to the Draft EIR and Recirculated Portions of Draft EIR*, presents changes and revisions to the Draft EIR and Recirculated Portions of Draft EIR. The County made changes and revisions to the Draft EIR and Recirculated Portions of Draft EIR either in response to comments received on these documents, or as necessary to clarify statements and conclusions made in these documents. None of the changes and revisions in Chapter 2 substantially affect the analysis or conclusions presented in the Draft EIR or the Recirculated Portions of Draft EIR.
- Chapter 3, *Agencies, Organizations and Individuals Commenting on the Draft EIR and Recirculated Portions of Draft EIR*, lists all agencies, organizations, and persons that submitted written and/or spoken comments on the Draft EIR and Recirculated Portions of Draft EIR during the public review periods.
- Chapter 4, *Master Responses*, contains comprehensive responses on topics that were discussed frequently in public comments on the Draft EIR and Recirculated Portions of Draft EIR.
- Chapter 5, *Written and Spoken Comments on the Draft EIR, and Responses to Comments*, contains all comment letters received, and copies of applicable public meeting transcripts held, during the Draft EIR public review period and the County's responses to significant environmental points raised in these letters and public meetings.
- Chapter 6, *Written and Spoken Comments on the Recirculated Portions of Draft EIR, and Responses to Comments*, contains all comment letters received, and copies of applicable public meeting transcripts held, during the public review period for the Recirculated Portions of Draft EIR, and the County's responses to significant environmental points raised in these letters and public meetings.

1.4 Further Draft EIR Recirculation Not Required

CEQA Guidelines Section 15088.5 requires Draft EIR recirculation when “significant new information” is added to an EIR because the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a project’s significant environmental effects or feasible mitigation measures or alternatives to reduce or avoid such effects that are not proposed for adoption. The comments, responses, Draft EIR revisions, and Recirculated Portions of Draft EIR revisions presented in this document do not constitute such “significant new information;” instead, they clarify, amplify, or make insignificant modifications to the Draft EIR and Recirculated Portions of Draft EIR. For example, none of the comments, responses, and Draft EIR or Recirculated Portions of Draft EIR revisions disclose new or substantially more severe significant environmental effects of the proposed Project, or new feasible mitigation measures or alternatives considerably different than those analyzed in the Draft EIR or Recirculated Portions of Draft EIR that would clearly lessen the proposed Project’s significant effects.