CHAPTER 2
Revisions to the Draft EIR and Recirculated Portions of Draft EIR

2.1 Overview

This chapter presents revisions to the text, tables and figures to the Draft EIR and Recirculated Portions of Draft EIR. These revisions include both (1) revisions made in response to comments on the Draft EIR and Recirculated Portions of Draft EIR, as well as (2) County staff-initiated text changes to correct minor inconsistencies, to add minor updates to information or clarification related to the Project, and to provide updated information where applicable. None of the revisions or corrections in this chapter substantially change the analysis and conclusions presented in the Draft EIR and Recirculated Portions of Draft EIR.

The chapter includes all revisions to the Draft EIR and Recirculated Portions of Draft EIR (see Section 2.2) in the sequential order that they appear in those documents. Preceding each revision is a brief explanation for the text change, and the section/page number in the Draft EIR or Recirculated Portions of Draft EIR where the revision occurs. Deletions in text and tables are shown in strikethrough (~~strikethrough~~) and new text is shown in underline (<u>underline</u>).[1] The same revisions presented in this chapter are also incorporated in the consolidated Draft EIR in Part 1 of this Final EIR, which includes the full text of the integrated Draft EIR and Recirculated Portions of the Draft EIR, as revised.[2]

2.2 Revisions to the Draft EIR and Recirculated Portions of Draft EIR

Draft EIR List of Abbreviations and Acronyms

Draft EIR List of Abbreviations and Acronyms, page xv, reference to California Office of Emergency Management is revised to Office of Emergency Services, in response to Comment A-PA-85, as follows:

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1 Please note that the Recirculated Portions of Draft EIR had also presented text deleted from the Draft EIR as strikethrough and text added to the Draft EIR as underline. However, for clarity sake, in this chapter, those edits are now accepted, and only further edits made as County-initiated changes and in response to comments are shown as either strikethrough or underline.

2 Please note, however, that the consolidated Draft EIR incorporates all the revisions as clean edits (i.e., revisions in the consolidated Draft EIR are not indicated with underline or strikethrough). In addition, since the consolidated Draft EIR integrates the Draft EIR and Recirculated Portions of Draft EIR and incorporates revisions made in response to comments received, page numbering for the consolidated Draft EIR will differ from original Draft EIR and Recirculated Portions of Draft EIR.

OES~~OEM~~ ~~California~~ Office of Emergency Services ~~Management~~

Draft EIR Chapter 1, Summary

Draft EIR Summary Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, page 1-10, a change is made to correct the mitigation for Impact 5.2-8 to match the mitigation as presented in Section 5.2, Air Quality section in the Draft EIR, as revised (excerpt of table shown).

> **Mitigation:** Implement the following mitigation measures:
>
> > Mitigation Measure 5.15-2(a): *Mitigation through either a program of "no net new commute trips" or through contribution of fair share fees for the cost of improvements to fund transportation mitigation efforts.*
> >
> > Mitigation Measures 5.3-8(a)-(b): *Mitigation for native oak woodland.*
> >
> > Mitigation Measure 5.3-9(a)-(c): *Mitigation for wetlands.*
> >
> > Mitigation Measure 5.3-11(a)-(c): *Mitigation for protected trees.*

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, Mitigation Measure 5.3-9(c) on page 1-15 is revised in response to Comment RA-SCVWD-1 to clarify the permitting agencies (excerpt of table shown):

> **Mitigation Measure 5.3-9(c):** *Jurisdictional waters or wetland replacement.* If the County Planning Office determines that avoidance of jurisdictional waters or wetlands is not feasible, Stanford shall obtain all appropriate permits or approval for work in jurisdictional waters (i.e., Waters of the State or Waters of the U.S.), from applicable agencies, including but not necessarily limited to, ~~wetland work from~~ the U.S. Army Corps of Engineers, ~~or~~ San Francisco Bay Regional Water Quality Control Board, and California State Department of Fish and Wildlife. ~~As specified by the Corps or Regional Water Quality Control Board, a~~ Any jurisdictional waters or wetlands that are filled as a result of project development shall be replaced through the creation, preservation or restoration of jurisdictional waters or wetlands or through other measures that the agencies deem appropriate through permit requirements to adequately mitigate the impact. Potential measures may include the following:

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, on page 1-23, in the mitigation for Impact 5.7-2, reference to Mitigation Measure 5.15-2 is revised as Mitigation 5.15-2(a) (excerpt of table shown):

> **Mitigation:** Implement the following mitigation measures:
>
> > Mitigation Measure 5.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*
> >
> > Mitigation Measures 5.3-8(a)-(b): *Mitigation for native oak woodland.*

Mitigation Measure 5.3-9(a)-(c): *Mitigation for wetlands.*

Mitigation Measure 5.3-11(a)-(c): *Mitigation for protected trees*.

Draft EIR Summary Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, page 1-28, a change is made to correct Mitigation Measure 5.11-2 to match Mitigation Measure 5.11-2 as presented in Section 5.11, Noise and Vibration section in the Draft EIR, as follows (excerpt of table shown):

> **Mitigation Measure 5.11-2:** *Construction Noise Control Measures and Noise Control Plan for On-Site Receptors.* For~~If~~ construction activities over two weeks in duration, and ~~would be~~ within 150 feet of on-site sensitive receptors, Stanford shall identify noise attenuation measures to reduce the generation of construction noise to achieve a minimum performance standard of 80 dBA, Leq over an 8-hour period at the nearest on-site residential~~,~~ or day care ~~or instructional classroom~~ land use.[2] These measures shall be described in a Noise Control Plan that shall be submitted for review and approval by the County Planning and Development Department prior to issuance of a building permit to ensure that construction noise is consistent with the standards ~~set forth in the County Ordinance Code~~.
>
> If necessary to achieve the minimum performance standard stated above, ~~Additional~~ measures specified in the Noise Control Plan and implemented during project construction shall include, at a minimum, the following noise control strategies:
>
> - Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels to below 80~~75~~ dBA;
>
> - Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to approximately 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and
>
> - Stationary construction noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.
>
> [2] Consistent with noise criteria used by FTA for construction activities in vicinity of residential land uses (FTA, 2008)

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, pages 1-33 to 1-34, a number of revisions are made to Mitigation Measure 5.15-1. The first bulleted paragraph on page 1-33 is revised to reflect submittal and advance coordination per VTA's Bus Stop Relocation Policy, in response to Comment A-SCVTA-2. The fourth bulleted paragraph on page 1-33 is revised in response to Comment A-PA-85 to reflect the inclusion of informing the

Palo Alto Police Department of construction locations. The second bulleted paragraph on page is revised in response to Comment A-SMC-25 to include truck routes in San Mateo County if San Mateo County designates such routes. A number of other minor changes are also made to further clarify the measure (excerpt of table shown):

> **Mitigation Measure 5.15-1:** *Construction Traffic Control Measures.* The following traffic control measures are required to address impacts from construction of individual 2018 General Use Permit projects.
>
> - ***Protection and Maintenance of Public Transit Access and Routes***. Stanford and its contractors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, during project construction without prior approval from the VTA and~~or~~ other affected~~appropriate~~ jurisdictions. Such approvals shall require submittal and advance coordination per VTA's Bus Stop Relocation Policy~~approval~~ of a mitigation plan to reduce transit~~specific~~ impacts to a less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing public transit bus stops, limiting access to public transit bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.
>
> - ***Maintenance of Pedestrian Access***. Stanford and its contractors shall be prohibited from substantially limiting pedestrian access to properties or facilities ~~in those affected jurisdictions~~ during construction of the project, without prior approval from ~~those~~ the affected jurisdictions. Such approvals shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting p~~P~~edestrian~~s~~ access~~ limiting actions would~~ include, but are not ~~be~~ limited to, sidewalk closures, bridge closures, crosswalk closures, ~~or~~ pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians~~ during the construction period~~. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided if determined by the County to be needed for pedestrian safety.
>
> - ***Maintenance of Bicycle Access***. Stanford and its contractors shall be prohibited from substantially limiting bicycle access to properties or facilities ~~in those affected jurisdictions while~~ during construction~~g~~ of the project, without prior approval from those jurisdictions. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting b~~B~~icycle access~~ limiting actions would~~ include, but are not ~~be~~ limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists~~ during the construction period~~.
>
> - ***Protection and Maintenance of Emergency Service Access and Routes***. Stanford shall inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and shall designate alternate evacuation and emergency routes ~~shall be designated~~ to maintain response times during construction periods.

- ***Parking for Construction-Related Vehicles***. Stanford shall ~~be required to~~ provide adequate on-campus parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the Stanford campus, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site.

- ***Restriction on Construction Delivery Hours***. Stanford shall make feasible attempts to avoid ~~limit the number of~~ construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between ~~the hours of~~ 4:30 PM and 6:00 PM.

- ***Construction Truck Routes***. Stanford shall ~~be required to~~ deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. Heavy construction vehicles shall be prohibited from accessing the site from ~~other~~ routes that the Cities of Palo Alto, Menlo Park or County of San Mateo have prohibited for use by such vehicles. Stanford shall provide written notification to all contractors regarding appropriate routes to and from construction sites and the weight and speed limits for local roads used to access construction sites. A copy of all such written notifications shall be submitted to the County Planning Office.

- ***Phone Number for Complaints***. Stanford shall post at least one sign no smaller than 1,296 square inches at all active construction sites. The sign shall contain the name, ~~and~~ telephone number and~~or~~ e-mail address of the appropriate Stanford person the public may contact to report alleged violations of this mitigation measure or to register complaints about construction traffic associated with building projects under the 2018 General Use Permit. Stanford shall keep a written record of all such complaints and shall provide copies of these records to the County Planning Office as part of the annual report process.

- ***Construction Impact Mitigation Plan***. In lieu of the above mitigation measures, Stanford may submit a detailed construction impact mitigation plan to the County for review and approval prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. If Stanford determines that it is not feasible to comply with the "Restriction on Construction Delivery Hours" above, then the plan shall also explain the basis for this infeasibility determination. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved.

- ***Construction During Special Events***. Stanford shall ~~implement a mechanism to~~ prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events~~, which~~ that attract a substantial number of visitors to the campus. This measure may require a special supplemental permit to be obtained to host such events during significant construction phases.

Significance after Mitigation: Less than Significant.

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, pages 1-34 to 1-38, a number of revisions are made to Mitigation Measure 5.15-2. This includes a number of staff-initiated changes made to clarify the original mitigation measure [revised as Mitigation Measure 5.15(a)]. In addition, a new Mitigation Measure 5.15-2(b) is added to address reverse commute impacts, in response to Comment A-MP-17. (Excerpt of table shown):

> **Mitigation Measure 5.15-2(a):** Stanford shall mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of fair share fees for the ~~funding equivalent to Stanford's proportionate share of the cost of~~ improvements for adversely affected intersections specified in Table 1 [minus the contribution to these improvements provided pursuant to Mitigation Measure 5.15-2(b), below], which funds shall be expended by the County to fund ~~transportation~~ mitigation efforts.
>
> 1. As specified on page 64 and Policy C-1 of the Stanford Community Plan, the no net new commute trips standard is defined as no increase in automobile trips during peak commute times in the peak commute direction, as counted at defined cordon locations around the central campus. The peak commute period is defined as the one-hour period in the morning (AM) and afternoon (PM) ~~of time~~ with the highest volume of traffic at the cordon locations, as determined by ~~the~~ traffic counts.
>
> 2. The reasonable cost of all traffic counts and other work conducted for determination of compliance with this mitigation measure shall be paid for by Stanford. The counts shall be performed by an independent consultant under the direction of the County Planning Office or provided to the County Planning Office through another County-approved methodology.
>
> 3. The baseline for measuring the no net new commute trips standard shall be the count that was established in 2001. However, during implementation of the 2018 General Use Permit, the County may modify, or approve Stanford-proposed modifications to ~~Stanford may propose to change~~ the monitoring methodology on new technology such as automation~~, subject to review and approval by the County Planning Office and in accordance with County requirements~~, so long as the basic principles underlying the no net new commute trips standard are still met. If the monitoring methodology is updated, testing and calibration of the new methodology or equipment will require coordination with the County. The County may adjust the 2001 baseline ~~data will be adjusted~~ as needed to reflect any such calibration. Monitoring counts shall be performed each year using the County-approved methodology.
>
> 4. Traffic counts and determination of traffic volumes shall occur as described below, unless modifications are approved by the County Planning Office.
>
>   a. Peak-hour traffic for a single year shall be determined through counts taken at two times during the year. All counts shall be conducted during the regular academic year, which does not include academic breaks or end-of-quarter finals. Homecoming or other irregular traffic patterns should be avoided. Specific dates for each count shall be determined by the County Planning Office. The two annual counts shall be averaged to determine the annual traffic level for each monitoring year.

i. During monitoring periods~~the AM peak hour and the PM peak hour~~, the total amount of traffic crossing the cordon line will be counted by travel direction. The cordon count monitoring will be conducted on a 24-hour basis~~from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM~~. The morning (AM) and afternoon (PM) peak hours within the 24~~two~~-hour count period will be calculated based on total volumes to determine the campus-wide peak hours.

ii. All counts shall be taken at the campus entry and exit points shown in Figure 5.15-2, which together form the defined cordon line. Additional cordon gateways may be added or the location of the cordon line may be modified as determined by the County.

a) Traffic counts shall include a methodology to determine the rate of cut-through traffic.

1) ~~All vehicles will need to be identified in order that cut-through trips can be removed from the total volume.~~ Cut-~~T~~through trips will be identified through license plates on each vehicle or other means. Entry and exit t~~T~~imes will be noted ~~in order~~ to determine when a vehicle crosses the cordon in either direction.

2) Matching license plates will be determined by comparing numbers that crossed both an entering and exiting cordon within a defined period (i.e.~~e.g.~~, 20 minutes or as updated), or through other means. Vehicles that enter and exit the cordon within the time period will be cut-through trips across the campus without a campus-related purpose. If data are available or it is feasible to measure, the County will include in the cordon counts all rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs.

b) Cordon volumes will be adjusted to account for use of parking lots within the cordon line by hospital-related traffic and use of lots outside the cordon line by campus-related traffic. Parking areas change due to the evolving needs of campus and hospital operations. The lots used for hospital and university parking shall be confirmed prior to annual surveys. The County reserves the right to change the methodology related to hospital parking or other parking factors in response to changing conditions.

1) Hospital trips will be subtracted from the count and campus trips will be added to the count. The count adjustment will also ~~need to~~ factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hours, data will need to be collected from each lot. If campus parking occurs in lots outside the cordon, trips associated with those vehicles will be added back into the count. If hospital parking occurs inside the cordon, trips associated with those vehicles will be subtracted from the count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots, unless the County approves an alternate protocol for assigning such parking.

c) Based on the 24-hour counts, the AM and PM ~~a~~ peak hours will be identified for the campus. Peak hour traffic volume will be determined for the campus based on the count, adjusted for cut-through traffic and hospital parking as described above.

1) Total entering and exiting traffic will be summed for the 16 campus gateways. A single AM and PM peak hour will be determined for the entire campus based on the ~~traffic volumes~~peak inbound traffic in the AM period and the peak outbound traffic in the PM period. The percent of cut-through trips calculated by the license plate matching (or other technology) described above will be removed. With the exception of rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs, ~~T~~the cut-through vehicles will be removed from both the inbound and the outbound traffic since they will have been observed crossing both an entering and exiting cordon boundary. Finally, the entering and exiting traffic for hospital uses inside the cordon boundary and the campus uses outside the cordon boundary calculated as described above will be subtracted from or added to the counts.

5. As specified by Community Plan Policy C-8, the County Planning Office will recognize participation by Stanford in off-campus trip reduction efforts and credit those reduced trips towards Stanford's attainment of the no net new commute trips standard. Stanford shall receive credit commensurate with the actual number of trips reduced outside the cordon due to Stanford's direct efforts, ~~and~~or the proportion of the cost of the program ~~that~~to which Stanford is contributing. A reduction of an off-campus trip ~~can~~may be recognized as long as at least one terminus for the trip is within the area shown on **Figure 5.15-8**. The County Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate. Such proposals shall be submitted by Stanford to the County Planning Office for review, modification and ~~consideration of~~potential approval. The proposals shall be presented to the Community Resource Group prior to any determination by the County Planning Office. Once the County Planning Office has accepted the proposal and the program implementation begins, the County Planning Office will identify, at Stanford's cost, the number of trips reduced outside the cordon and ~~factor a~~ calculate~~ion of the~~ a trip reduction credit ~~into its~~ for application toward attainment of ~~Stanford's annual compliance with~~ the no net new commute trips standard, with the continuing requirement that Stanford provide evidence of its participation in the ongoing program in a manner that can be independently verified. The County reserves the right to further regulate Project-generated trips and the use of trip credits through the Conditions of Approval for the General Use Permit.

Funding of off-campus circulation infrastructure improvements may also ~~will~~ qualify for trip credits if ~~as long as~~ the improvements will enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area, and thereby remove vehicular trips from the local impact area. For example, funding roadway widening or modifications to add transit vehicle or bicycle lanes or to add signals to improve pedestrian or bicycle safety could qualify for trip credits under this approach if approved by the County. Any proposal for such credits shall be

accompanied by substantial evidence demonstrating thathow the infrastructure project would remove vehicular trips from the local impact area. Once the County Planning Office has approved infrastructure improvement project for a trip reduction credit, the project has been implemented, and the trip reductions have been verified, the trip reduction credit will be factored into the County's conclusion regarding Stanford's annual compliance with the no net new commute trips standard in each subsequent year.

Each year, the County will report Stanford's trip credits in its annual monitoring report. The County will track and calculate trip reduction credits in a manner designed to ensure that credits benefit the three geographic sub-areas surrounding the Stanford campus (north, east, and south/southwest) in rough proportion to the 2018 General Use Permit trip assignment forecasted in the Draft EIR. Trip reduction credits with area-wide benefit will be tracked separately from trip reduction credits with sub-area geographic benefits.

6. The County Planning Office shall monitor the cordon counts using the procedures described above. If the cordon counts, as modified by trip reduction credits, exceed the baseline volume by 1% or more for any two out of three consecutive years, mitigation of impacts to intersections in the form of fair share payments will be required, implementing Stanford Community Plan Implementation Recommendation C(i)(9). Table 1 identifies the intersection impacts that could occur if the no net new commute trips standard is not achieved, and the physical improvements that would substantially reduce each impact.

   a. Prior to the first year of cordon count monitoring under the 2018 General Use Permit, the County Planning Office will: 1) determine, in consultation with the affected jurisdictions, the cost of the intersection improvements identified in Table 1; 2) identify Stanford's fair share contributions to those improvements based on Stanford's proportionate contribution to the impact from development under the 2018 General Use Permit as compared to the contributions to the impact from background and cumulative traffic at the intersections; and 3) establish a cost-per-trip fee. This fee shall be increased annually to reflect changes in California construction costs (e.g., by applying the relevant Saylor or RS Means construction cost index).

      i. Upon the County's its determination that the no net new commute trips standard has been exceeded by 1% or more in two out of three consecutive years, the County will require Stanford to paymake its fair share the cost-per-trip fee for each peak hour trip that exceeded the established no net new commute trips standard during the applicable two to three-year time period.

      ii. To calculate the annual cost-per-trip fee, the total amount of Stanford's fair share contribution to all intersection improvements will be divided by 17, to reflect the number of years that the 2018 General Use Permit is expected to be in effect. The resulting quotient will then be divided by the total number of peak hour, peak direction vehicle trips anticipated in the EIR to occur absent the no net new commute trips standard.

      iii. The annual cost-per-trip fee times the number of trips exceeding the no net new commute trips standard in each of the applicable years (i.e., calculated

~~over two years if the goal is exceeded two out of three years) will constitute the trip payment that Stanford must provide to the County.~~

~~iv. In no event would Stanford be required to pay cumulatively over the time period of the 2018 General Use Permit more than the total amount of its fair share~~ contribution toward improvements at adversely affected intersections and roadways based on all exceedances of the "no net new commute trips" standards.

~~b.~~ The County Planning Office will use the intersection improvement ~~trip~~ fees collected from Stanford as follows:

a. The fees shall be used to fund the intersection improvements identified in Table 1. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the fees are used to fund an intersection improvement in another jurisdiction, the County will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.

b. Substitute Mitigation:

~~i. The County Planning Office may elect~~ If the County Planning Office determines that it is not feasible to use the fees for the specified intersection improvements (e.g., it does not appear that there will be full funding for the improvements within a reasonable time; the public agencies with authority or jurisdiction over the improvement projects will not approve the projects), then the fees may be used to fund off-campus projects that encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area, including but not limited to transit improvements that would directly or indirectly ~~would~~ benefit the local impact area. This fund also could be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users provided there is substantial evidence demonstrating how the improvements would remove vehicular trips from the local impact area.

~~ii. The County Planning Office may elect to fund one or more of the intersection improvements identified in Table 1. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the County elects to fund an intersection improvement in another jurisdiction, it will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.~~

Mitigation Measure 5.15-2(b): Stanford shall mitigate the transportation impacts of its additional development and population growth with respect to reverse-commute impacts through the contribution of fair share fees for the cost of improvements for adversely affected intersections specified in Table 2 (a subset of the adversely affected intersections

specified in Table 1), which funds shall be expended by the County to fund transportation mitigation efforts in the same manner as provided in Mitigation Measure 5.15-2(a)(6)(a) and (b).

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, page 1-38, to correlate with the previously described revisions to Mitigation Measure 5.15-2, the mitigation for Impact 5.15-3 is revised from Mitigation Measure 5.15-2 to Mitigation Measure 5.15-2(a) (excerpt of table shown):

Mitigation: Implement Mitigation Measure 5.15-2(a).

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, page 1-39, to correlate with the previously described revisions to Mitigation Measure 5.15-2, the mitigation for Impact 5.15-9 is revised from Mitigation Measure 5.15-2 to Mitigation Measure 5.15-2(a)-(b) (excerpt of table shown):

Mitigation: Implement Mitigation Measure 5.15-2(a)-(b).

Draft EIR Section 1.9, Table 1-2, Summary of Impacts and Mitigation Measures, page 1-39, to correlate with the previously described revisions to Mitigation Measure 5.15-2, the mitigation for Impact 5.15-10 is revised from Mitigation Measure 5.15-2 to Mitigation Measure 5.15-2(a) (excerpt of table shown).

Mitigation: Implement Mitigation Measure 5.15-2(a).

Draft EIR Chapter 3, Project Description

Draft EIR Chapter 3, Project Description, Section 3.11, page 3-31, the approvals are revised as a staff-initiated change:

Approval and implementation of the proposed project would require the following approvals from the County:

- Certification of the 2018 General Use Permit EIR;
- Adoption of a 2018 General Use Permit;
- Approval of corresponding amendments to the County Zoning Ordinance Maps (zoning designation changes are proposed for specific parcels within the campus); ~~and~~
- Approval of corresponding amendments to the Stanford Community Plan component of the County General Plan, including figures, tables and text ~~(no modifications are proposed to the Community Plan strategies, policies or implementation measures).~~; and
- Approval of the Water Supply Assessment.

> In addition to the project approvals listed above, the Board of Supervisors may consider approval of a development agreement (pursuant to Government Code Section 65864 et seq.) between the County of Santa Clara and Stanford. A public hearing on such a development agreement would be held by the Planning Commission and the Board of Supervisors per Section 5.20.230 of the County's Zoning Ordinance, and the Board of Supervisors may approve the development agreement only by ordinance.

Draft EIR Section 5.2, Air Quality

The Air Quality Technical Report that was prepared by Stanford's air quality consultant (Ramboll) in support of the 2018 General Use Permit (included as Appendix AQT in the Draft EIR) was revised as a result of County-initiated changes, and in response to comments received on the Draft EIR. The revised Air Quality Technical Report (dated July 24, 2018, and included as Appendix AQT-REV in this Final EIR) was independently peer reviewed by ESA. The revised Air Quality Technical Report included as Appendix AQT-REV replaces the original Air Quality Technical Report in its entirety.

Draft EIR Section 5.2 Air Quality, page 5.2-1, first paragraph, ninth sentence, is revised as follows to reflect Appendix AQT-REV.

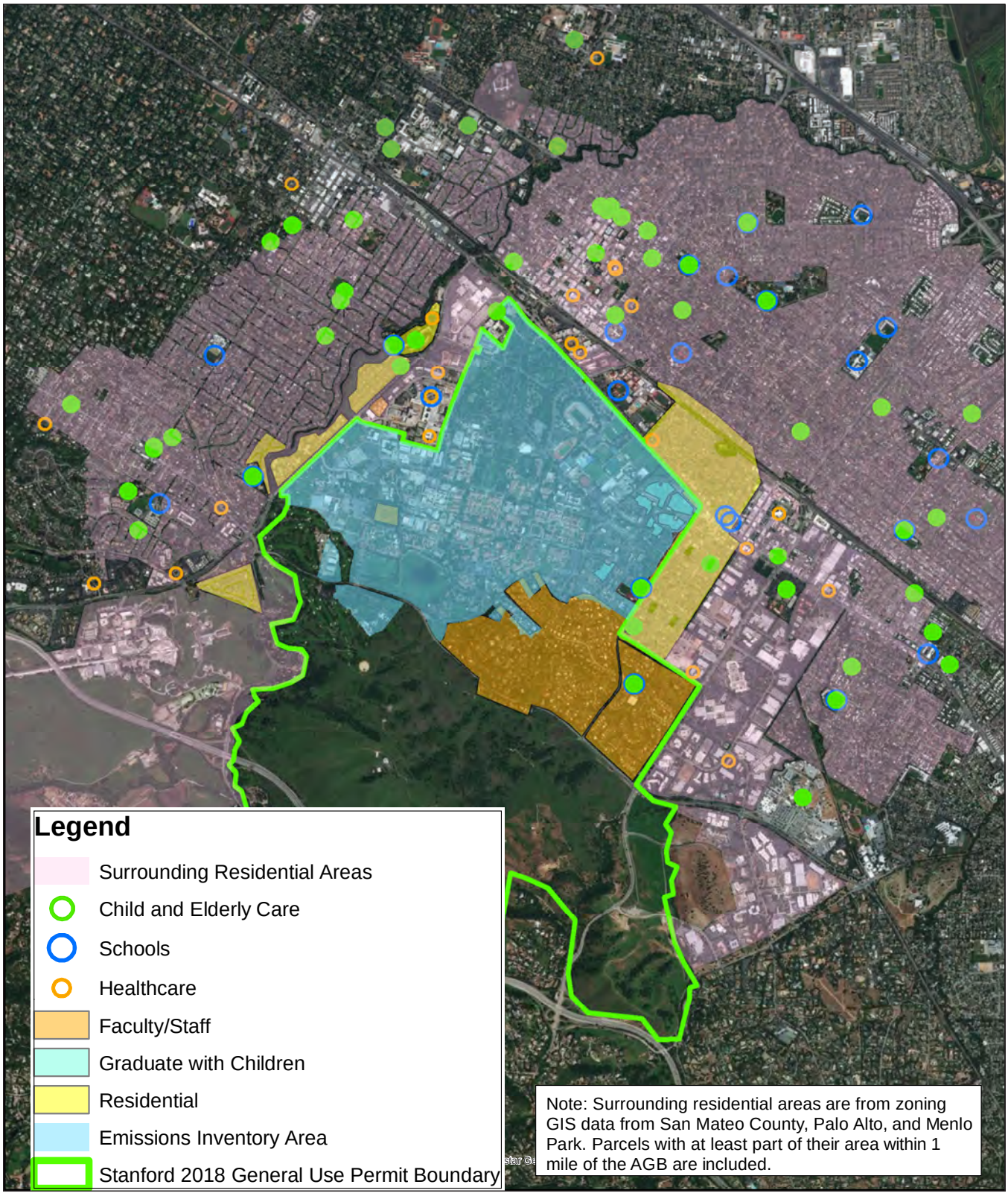
> The section relies in part on an Air Quality Technical Report prepared by Stanford in support of its 2018 General Use Permit application (see Appendix AQT-REV), which was independently peer reviewed by ESA.

Draft EIR Section 5.2 Air Quality, page 5.2-9, last paragraph, first sentence, is revised as follows to reflect Appendix AQT-REV.

> The Air Quality Technical Report (see Appendix AQT-REV) estimated the criteria air pollutant and TAC emissions inventories in the study area for the 2018 environmental baseline condition, including from both building operations and mobile sources, and construction emissions.

Draft EIR Section 5.2 Air Quality, Figure 5.2-1 on page 5.2-10 is replaced with a new figure (see following page), in response to Comment A-MP-42, that illustrates both on- and off-site sensitive receptors.

The primary changes reflected in the revised Air Quality Technical Report involved the inclusion of entrained road dust (localized Santa Clara County-specific emission factors were applied using Method 7.9 of the California Air Resources Board) for both the 2018 Baseline, and buildout of the proposed Project scenarios. Consequently, the correlating revised values for PM_{10} and $PM_{2.5}$ in Section 5.2 of the Draft EIR with the inclusion of entrained road dust have increased compared to what was reported in the Draft EIR.



SOURCE: Ramboll Environ, 2018

Stanford 2018 General Use Permit . 160531

Figure 5.2-1 (Revised)
Sensitive Receptor Locations

The Draft EIR Section 5.2 Air Quality page 5.2-11, Table 5.2-3 is revised to reflect the inclusion of entrained road dust in the 2018 Baseline calculations.

TABLE 5.2-3
CRITERIA AIR POLLUTANT EMISSIONS—2018 BASELINE

Source	ROG	NOx	PM_{10}	$PM_{2.5}$
	Maximum Annual Emissions (Tons Per Year)			
Mobile Sources	29	54	~~10.0~~31	~~4.4~~7.7
Hot Water Generators	0.33	0.61	0.38	0.38
Steam Plant	0.24	0.82	0.33	0.33
Natural Gas Boilers	1.0	19	1.4	1.4
Emergency Generators	0.38	7.3	0.21	0.21
Laboratories	15	--	--	--
Fuel Stations	0.07	--	--	--
Total[b]	47	82	~~12~~33	~~6.5~~10

NOTES:
[a] $PM_{2.5}$ from non-mobile sources conservatively assumed to be equivalent to PM_{10}.
[b] Emission totals may not appear to total due to rounding.

SOURCE: Ramboll Environ, 2018~~7~~

Draft EIR Section 5.2 Air Quality, page 5.2-31, fourth paragraph, second sentence, is revised as follows to reflect Appendix AQT-REV.

> All other emissions for the average and peak construction scenarios are quantified using the CalEEMod emissions estimator model (see Appendix AQT-REV).

Draft EIR Section 5.2 Air Quality, page 5.2-34, second paragraph, first sentence, is revised as follows to reflect Appendix AQT-REV.

> The screening tool is based on a HRA described in the Air Quality Technical Report (see Appendix AQT-REV) based on the EV Graduate Residences project, which reflects the largest quantity of earth moving and the largest amount of above and below ground construction that Stanford has undertaken for a single project under the 2000 General Use Permit.

Draft EIR Section 5.2 Air Quality, page 5.2-35 last paragraph, second sentence, is revised as follows to reflect Appendix AQT-REV.

> The Air Quality Technical Report included in Appendix AQT-REV contains a detailed inventory of operational emissions under the proposed Project.

Draft EIR Section 5.2 Air Quality, Impact 5.2-4 page 5.2-35 last paragraph fourth sentence and page 5.2-36 first paragraph first sentence is revised to reflect the inclusion of entrained road dust in the calculations.

> Vehicle trip emissions were calculated using EMFAC2014 and entrained roadway dust emissions factors from CARB, based on vehicle trip generation rates developed for the proposed Project described in Section 5.15, Transportation and Traffic.

Draft EIR Section 5.2 Air Quality, Impact 5.2-4 page 5.2-36 first full paragraph, a text correction is made to remove references to average daily emissions in Table 5.2-9.

> **Table 5.2-9**, below, presents the total maximum annual emissions ~~and average daily emissions~~ of criteria air pollutants in the study area in 2035 with buildout of the proposed 2018 General Use Permit.

Draft EIR Section 5.2 Air Quality page 5.2-36, Table 5.2-9 is revised to reflect the inclusion of entrained road dust in the 2035 with Buildout of the 2018 General Use Permit calculations, as shown below.

TABLE 5.2-9
TOTAL OPERATIONAL CRITERIA AIR POLLUTANT EMISSIONS IN 2035 WITH BUILDOUT OF THE 2018 GENERAL USE PERMIT

Source	ROG	NOx	PM10	PM2.5[a]
	Maximum Annual Emissions (Tons Per Year)			
Mobile Sources	19	15	~~12~~39	9.5~~5.2~~
Hot Water Generators	0.40	0.74	0.47	0.47
Steam Plant	0.29	1.0	0.40	0.40
Natural Gas Boilers	1.3	23	1.8	1.8
Emergency Generators	0.47	9.0	0.26	0.26
Laboratories	19	--	--	--
Fuel Stations	0.04	--	--	--
Total[b]	40	49	~~15~~42	~~8.1~~12

NOTES:
[a] $PM_{2.5}$ from non-mobile sources conservatively assumed to be equivalent to PM_{10} value.
[b] Emission totals may not appear to total due to rounding.

SOURCE: Ramboll Environ, 2018~~7~~

Draft EIR Section 5.2 Air Quality, Impact 5.2-4 page 5.2-36 second to last paragraph, third sentence is revised to reflect the inclusion of entrained road dust in the calculations.

> Emissions of PM_{10} and $PM_{2.5}$ are predicted to increase due primarily to exhaust and entrained roadway dust emissions that would result from increased VMT that would not be reduced as much as ROG or NOx by predicted emission improvements in tailpipe emissions or proposed electrification.

Draft EIR Section 5.2 Air Quality, page 5.2-37, Table 5.2-10 is revised to reflect the inclusion of entrained road dust in the 2018 Baseline and 2035 with Buildout of the 2018 General Use Permit calculations, as shown below.

TABLE 5.2-10
NET CHANGE IN MAXIMUM ANNUAL AND AVERAGE DAILY OPERATIONAL CRITERIA AIR POLLUTANT EMISSIONS

Pollutant:	ROG	NOx	PM_{10}	$PM_{2.5}$[a]
Maximum Annual Emissions (Tons Per Year)				
Total 2018 Baseline Emissions	47	82	~~12~~33	~~6.5~~10
Total Emissions in 2035 with Buildout of 2018 General Use Permit	40	49	~~15~~42	~~7.8~~12
Net Change in Emissions[b]	-7	-32	~~+3~~9.4	~~+0.5~~2.3
Threshold	10	10	15	10
Above Threshold?	No	No	No	No
Average Daily Emissions (Pounds Per Day)				
Total 2018 Baseline Emissions	256	447	~~68~~181	~~36~~55
Total Emissions in 2035 with Buildout of 2018 General Use Permit	220	270	~~84~~232	~~43~~68
Net Change in Emissions	-36	-178	~~+16~~52	~~+7~~13
Threshold	54	54	82	54
Above Threshold?	No	No	No	No

NOTES:
[a] $PM_{2.5}$ from non-mobile sources conservatively assumed to be equivalent to PM_{10} value.
[b] Emission totals may not appear to total due to rounding.

SOURCE: Ramboll Environ, 2018~~7~~

Draft EIR Section 5.2 Air Quality, page 5.2-38 fourth paragraph, first sentence, is revised as follows to reflect the revised air quality appendix (Appendix AQT-REV).

> TAC emissions dispersion was predicted in a model accounting for local meteorological conditions. Further details on the methods for risk estimation for laboratories can be found in the Appendix AQT-REV.

Draft EIR Section 5.2 Air Quality, page 5.2-45, to correlate with the previously described revisions to Mitigation Measure 5.15-2, in the mitigation measure for Impact 5.2-8, Mitigation Measure 5.15-2 is revised as Mitigation Measure 5.15-2(a).

> **Mitigation:** Implement the following mitigation measures:
>
> > Mitigation Measure 5.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*
> >
> > Mitigation Measures 5.3-8(a)-(b): *Mitigation for native oak woodland.*

Mitigation Measure 5.3-9(a)-(c): *Mitigation for wetlands.*

Mitigation Measure 5.3-11(a)-(c): *Mitigation for protected trees.*

Draft EIR Section 5.3, Biological Resources

Draft EIR Section 5.3 Biological Resources, Mitigation Measure 5.3-9(c) on page 5.3-44, is revised in response to Comment RA-SCVWD-1 to clarify the permitting agencies:

> **Mitigation Measure 5.3-9(c):** *Jurisdictional waters or wetland replacement.* If the County Planning Office determines that avoidance of jurisdictional waters or wetlands is not feasible, Stanford shall obtain all appropriate permits or approval for work in jurisdictional waters (i.e., Waters of the State or Waters of the U.S.), from applicable agencies, including but not necessarily limited to, ~~wetland work from~~ the U.S. Army Corps of Engineers, ~~or~~ San Francisco Bay Regional Water Quality Control Board, and California State Department of Fish and Wildlife. ~~As specified by the Corps or Regional Water Quality Control Board, a~~Any jurisdictional waters or wetlands that are filled as a result of project development shall be replaced through the creation, preservation or restoration of jurisdictional waters or wetlands or through other measures that the agencies deem appropriate through permit requirements to adequately mitigate the impact. Potential measures may include the following:
>
> - For creek projects, remove hardscape features from the stream channel and stream banks.
> - Stabilize exposed slopes or streambanks immediately upon completion of construction activities.
> - To restore disturbed aquatic sites, a wetland mitigation and monitoring plan will be prepared that outlines the objectives to mitigate for construction impacts. At a minimum the plan will include thresholds of replanting success (e.g., 90 percent plant survival after one year, 80 percent second year, and 70 percent third year), monitoring requirements (e.g., at least once each year to confirm site stability, plant viability, and to schedule weeding, as needed), and shall specify resource agency reporting requirements.

Draft EIR Section 5.4, Cultural Resources

Draft EIR, Section 5.4, page 5.4-1, first paragraph fourth sentence is corrected to refer to Appendix HIS (it was incorrectly referred to an Appendix CUL):

> The section relies in part on an Historic Resources Report prepared by Stanford in support of its 2018 General Use Permit application (see Appendix HIS~~CUL~~), and an archaeological resources map for Stanford that is on file at the County of Santa Clara Planning Office.

Draft EIR, Section 5.4, page 5.4-5, third paragraph fourth sentence is corrected to refer to Appendix HIS (it was incorrectly referred to an Appendix CUL):

> A detailed description of the evolution of the campus design and each of the buildings is included in the Historic Resources Report (Appendix HIS~~CUL~~).

Draft EIR Section 5.7, Greenhouse Gas Emissions

Draft EIR Section 5.7, on page 5.7-33, to correlate with the previously described revisions to Mitigation Measure 5.15-2, in the mitigation for Impact 5.7-2, reference to Mitigation Measure 5.15-2 is revised as Mitigation 5.15-2(a).

> **Mitigation:** Implement the following mitigation measures:
>
> > Mitigation Measure 5.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*
> >
> > Mitigation Measures 5.3-8(a)-(b): *Mitigation for native oak woodland.*
> >
> > Mitigation Measure 5.3-9(a)-(c): *Mitigation for wetlands.*
> >
> > Mitigation Measure 5.3-11(a)-(c): *Mitigation for protected trees*.

Draft EIR Section 5.8, Hazards and Hazardous Materials

Draft EIR Section 5.8 Hazards and Hazardous Materials, on page 5.8-30, fifth paragraph, first sentence, revises reference to the Office of Emergency Management (OEM) to the Office of Emergency Services (OES) in response to Comment A-PA-85:

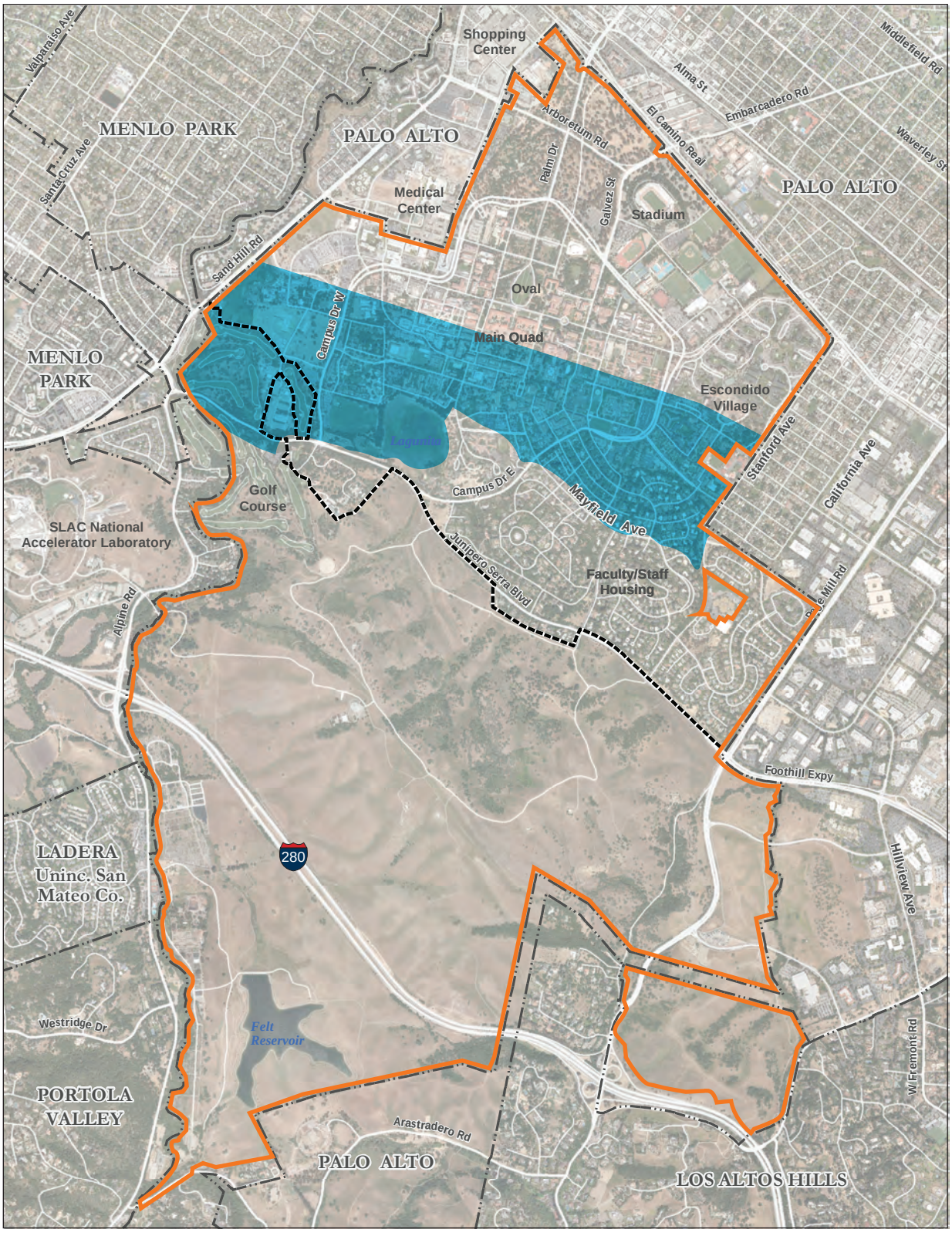
> Under the Project, Stanford would continue to operate its Office of Emergency Services~~Management~~ (OES~~M~~) and coordinate emergency response planning efforts with applicable jurisdictional emergency response providers, including County OES~~M~~.

Draft EIR Section 5.9, Hydrology and Water Quality

Draft EIR Section 5.9 Hydrology and Water Quality, page 5.9-8, last paragraph, second sentence is revised in response to Comment A-SCVWD-3 to acknowledge that the SCVWD is designated by DWR as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin, as follows:

> The Santa Clara Valley Water District (SCVWD) is designated by~~has submitted an application to~~ the DWR ~~to serve~~ as the exclusive Groundwater Sustainability Agency for the Santa Clara ~~this~~ Subbasin.

Draft EIR Hydrology and Water Quality, in response to Comment A-SCVWD-5, and as a result of subsequent coordination that has occurred between the County, SCVWD and Stanford regarding the limits of the Unconfined Zone within the 2018 General Use Permit Boundary, Figure 5.9-4: Groundwater Recharge Zone on page 5.9-12 in the Draft EIR is replaced with a new figure on the following page.



SOURCE: SCVWD, 2018; Stanford LRBE LUEP, 2017

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Figure 5.9-4 (Revised)
Groundwater Recharge Zone

Draft EIR Section 5.9 Hydrology and Water Quality, page 5.9-16, first paragraph, second sentence is revised in response to Comment A-SCVWD-6 to note that local agencies had until June 30, 2017 to elect to become or form a groundwater sustainability agency, as follows:

> Local agencies had until June 30~~January 1~~, 2017 to elect to become or form a groundwater sustainability agency.

Draft EIR Section 5.9 Hydrology and Water Quality, page 5.9-16, the following text is added at the end of the first paragraph in response to Comment A-SCVWD-6 to acknowledge that the SCVWD is designated by DWR as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin, as follows:

> As discussed previously, the SCVWD is designated by the DWR as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin.

Draft EIR Section 5.9 Hydrology and Water Quality, Impact 5.6-6, page 5.9-28, last paragraph, last full sentence, the 2018 environmental baseline estimate for Stanford remaining detention capacity in the Matadero Creek watershed is revised from 8.52 million square feet to 8.48 million square feet to correct an error:

> As discussed under 2018 Baseline Environmental Setting, by 2018, the existing detention facilities are estimated to have the capacity for accommodating an additional approximate 57.0 acres (2.48 million square feet) of impervious surfaces in the San Francisquito watershed, and an additional approximate 194.8 acres (8.48~~52~~ million square feet) of impervious surfaces in the Matadero watershed.

Draft EIR Section 5.9 Hydrology and Water Quality, Impact 5.9-8 on page 5.9-30, in response to additional information provided in Comment A-SCVWD-10, the supporting impact discussion is revised as follows:

> Construction and operation of the proposed development under the 2018 General Use Permit, together with past, present and other reasonably foreseeable future projects in the vicinity could cumulatively decrease groundwater supplies and interfere with groundwater recharge. As discussed in the Environmental Setting, the Santa Clara Valley Groundwater Basin is not currently in an overdraft condition and is actively managed by the SCVWD. The SCVWD is designated by the DWR as the exclusive Groundwater Sustainability Agency (GSA) for the Santa Clara Subbasin, which comprises a portion of the larger Santa Clara Valley Basin. ~~which has recently submitted an application to serve as the Groundwater Sustainability Agency (GSA) for the basin in accordance with the Groundwater Sustainability Management Act.~~ A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. A GSA must submit and implement a GSP or prescribed alternative under the Sustainable Groundwater Management Act of 2014. The SCVWD submitted the 2016 Groundwater Management Plan for the Santa Clara and Llagas Subbasins to DWR as an Alternative to a GSP in December 2016. Stanford will also continue

implementation of the Campus-wide Plan for Groundwater Recharge, as specified in Mitigation Measure 5.9-4, above, to ensure that any loss of recharge areas due to new Project development is addressed through management of Lagunita reservoir as described above. Therefore, considering the projected use of groundwater for the Project, the proposed landscaping vegetation, current and future management of the groundwater basin and continued adherence to the groundwater recharge plan as overseen by SCVWD, there would be a less than significant cumulative impact to groundwater levels or supplies.

Draft EIR Section 5.11, Noise and Vibration

Draft EIR Section 5.11 Noise and Vibration, page 5.11-20, third paragraph, first sentence, is revised with a footnote, as follows:

Increases in traffic noise along roadways are assessed using the traffic noise model of the Federal Highway Administration and traffic volumes estimated in the Transportation Impact Analysis (Appendix TIA).[3A]

[3A] It should be noted that while certain 2035 Cumulative Baseline and 2035 Cumulative Baseline with Project traffic volumes were modified in the revised TIA in Appendix TIA-REV and reflected in Section 5.15 Transportation and Traffic as revised, these revisions did not affect any roadside noise level conclusions in Section 5.11, Noise and Vibration, and consequently no revisions to the traffic volumes in this section were required.

Draft EIR Section 5.12, Population and Housing

Draft EIR Section 5.12 Population and Housing, page 5.12-16, Table 5.12-10, the following change is made to correct a typographical error in the number of family members associated with faculty/staff/ postdoctoral students within the Project site boundary in 2035, and the correlating change in this residential population category between 2018 and 2035:

TABLE 5.12-10
STANFORD POPULATION RESIDING ON PROJECT SITE – 2035

Affiliation	Residential Population Within Project Site Boundary 2018	Residential Population Within Project Site Boundary 2035	Change in Residential Population
Undergraduate Students	6,617	8,317	1,700
Graduate Students	5,205	8,183	2,978
Non Student Spouses	660	894	234
Children	420	420	0
Faculty/Staff/Postdoctoral Students	965	1,515	550
Other Family Members	1,471	2,335~~2,535~~	864~~1,064~~
Total	**15,338**	**21,664**	**6,326**

SOURCE: Stanford University Land Use and Environmental Planning Office, in consultation with the Stanford University Residential and Dining Enterprises

Draft EIR Section 5.13, Public Services

Draft EIR Section 5.13 Public Services, page 5.13-2, fourth and fifth bullets are revised in response to Comment A-PA-85, as follows:

- ~~one Rescue truck (at Station 2) for vehicle accidents, hazardous materials and technical rescues, and search and rescue at fires; and~~
- two advanced life support ambulances (at Stations 1 and 2) that respond to all medical incidences, and are also included in fire, rescue, and vehicle accidents and hazardous materials incidents, and one cross-staffed ambulance (at Station 4) that responds to medical incidents when the ambulances from Stations 1 and 2 are not available (City of Palo Alto, 2015).

Draft EIR Section 5.13 Public Services, page 5.13-3, first paragraph, second full sentence is revised in response to Comment A-PA-85, as follows:

> In FY 2016, PAFD arrived at 89 percent of fire emergencies within eight minutes, 92 percent of EMS calls within eight minutes, and ~~99 percent of~~ placed a paramedic at EMS calls within 12 minutes, 99 percent of the time.

Draft EIR Section 5.13 Public Services, page 5.13-4, the following sentence is added after the third paragraph in response to Comment A-PA-85:

> In Palo Alto, the PAPD funds 29 crossing guards for the City on school commute routes.

Draft EIR Section 5.13 Public Services, Table 5.13-1, page 5.13-5, 2016/17 enrollments at two elementary school schools (Barron Park and Duveneck) are revised in response to Comment A-PAUSD1-19 (in "Note" above comment). (Please note the elementary school enrollment subtotal did not change, however). In addition, Table 5.13-1 reflects revisions for 2016/17 enrollments at two high schools (Gunn and Palo Alto), as shown on the following page.

Draft EIR Section 5.13 Public Services, page 5.13-6, first paragraph is revised to reflect the revised high school enrollment total from 3,848 to 3,911, correcting an error:

> As shown in Table 5.13-1, during the 2016/17 school year, PAUSD elementary schools had 5,214 students in attendance and a capacity of approximately 5,521 students, PAUSD middle schools had 3,094 students in attendance and a capacity of approximately 2,950 students, and PAUSD high schools had 3,911~~3,848~~ students in attendance and a capacity of approximately 4,500 students (California Department of Education [DOE], 2017; and PAUSD, 2017).

TABLE 5.13-1
2016 / 17 PAUSD CAPACITY AND ENROLLMENT

Schools	2016/17 Enrollment	Capacity[a]
Elementary		
Addison	437	405
Barron Park	285~~442~~	380
Juana Briones	319	392
Duveneck	442~~492~~	595
El Carmelo	359	370
Escondido	535	595
Fairmeadow	496	572
Herbert Hoover	392	405
Lucille Nixon	457	460
Ohlone	576	617
Palo Verde	389	360
Walter Hays	428	560
Greendell	99	101
Total	**5,214**	**5,521[b]**
Middle Schools		
David Starr Jordan	1,176	1,100
Jane Lathrop Stanford	1,203	1,100
Terman	715	750
Total	**3,094**	**2,950**
High School		
Gunn	1,919~~1,904~~	2,200
Palo Alto	1,992~~1,944~~	2,300
Total	**3,911~~3,848~~**	**4,500**
District-wide Total	**12,219~~12,156~~**	**13,777**

NOTES:
[a] PAUSD indicates the following:
- The school capacities are interim projections, pending results of its in-progress 2018 Facilities Master Plan.
- The school capacities include rooms planned to be built out with current bond funds.
- The individual elementary school capacities assume all elementary classrooms are fully loaded.

[b] PAUSD indicates that utilizing all PAUSD building space would require numbers of elementary school children to be transferred from their neighborhood school to fill vacant classroom space in other PAUSD schools. Consequently, PAUSD discounted the total of the individual school capacities by 5 percent to estimate the total elementary school capacity.

SOURCE: California Department of Education, 2018~~2017~~; and PAUSD, 2017

Draft EIR Section 5.13 Public Services, Impact 5.13-1, page 5.13-13, second to last paragraph is edited in response to Comments A-PA-10 and A-PA-58:

> As under the 2000 General Use Permit, during the proposed 2018 General Use Permit, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for ~~PAFD~~ fire protection/EMS services from the service provider(s) ~~PAFD~~ and for communication and emergency dispatch services from the PAPD.

Draft EIR Section 5.13 Public Services, Impact 5.13-2, page 5.13-14, the last paragraph is edited in response to Comments A-PA-10 and A-PA-58, and to recognize a new contract executed between the City of Palo Alto and Stanford for PAFD to provide fire protection and EMS services to Stanford, with automatic renewal:

> As under the 2000 General Use Permit, during the proposed 2018 General Use Permit, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for fire protection/EMS services from the service provider(s)~~PAFD~~. The City of Palo Alto and Stanford are currently under a five-year ~~in negotiation for a 3-5 year~~ contract for PAFD to provide fire protection and EMS services to Stanford, with automatic renewal.

Draft EIR Section 5.13 Public Services, Impact 5.13-5, page 5.13-18, fourth to last paragraph, last sentence is edited in response to Comments A-PA-10 and A-PA-58:

> Furthermore, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for fire protection/EMS services from the service provider(s)~~PAFD~~.

Draft EIR Section 5.13 Public Services, page 5.13-20, under Subsection 5.13.6 References, the following reference which was omitted in the Draft EIR is added as the fifth reference:

> City of Palo Alto, 2017b. City of Palo Alto Fiscal Year 2018 Proposed Operating Budget, April 2017.

Draft EIR Section 5.15, Transportation and Traffic

A Transportation Impact Analysis (TIA) - Part 1 and Part 2 - was originally prepared by Stanford's transportation consultant (Fehr & Peers Transportation Consultants) in support of the proposed 2018 General Use Permit (included as Appendix TIA in the Draft EIR). Appendix TIA was revised by Fehr and Peers Transportation Consultants in August 2018 for Part 1 and in September 2018 for Part 2, as a result of County-initiated changes, and in response to comments received on the Draft EIR, as described below. As with the original TIA, the revised TIA was independently peer reviewed by ESA and AECOM. The revised TIA replaces the original TIA in its entirety. For convenience, the original Appendix TIA is deleted, and the revised TIA is included in this Final EIR as Appendix TIA-REV.

A Transit and Bicycle Capacity Analysis was originally prepared by Stanford's transit and bicycle consultant (Arup) in support of the proposed 2018 General Use Permit (included as Appendix TBC in the Draft EIR). An addendum to the Transit and Bicycle Capacity Analysis was prepared by Arup in April 2018 providing supplemental analysis in response to comments received on the Draft EIR, as described below. As with the original Transit and Bicycle Capacity Analysis, the Transit and Bicycle Capacity Analysis - Addendum #1 was independently peer reviewed by ESA. The Transit and Bicycle Capacity Analysis - Addendum #1 supplements, but does not replace, the original

Transit and Bicycle Capacity Analysis. The Transit and Bicycle Capacity Analysis - Addendum #1 is included in Appendix TBC-REV in this Response to Comments Document.

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-1 first paragraph, sixth sentence is revised to reflect the new technical reports described above:

> The section relies in part on four technical reports prepared by Stanford in support of the proposed 2018 General Use Permit: (1) a Transportation Impact Analysis (TIA) (see Appendix TIA-REV); (2) a Vehicle Miles Traveled (VMT) Analysis (see Appendix VMT); a Transit and Bicycle Facility Analysis and Addendum (see Appendix TBC and Appendix TBC-ADD); and a Parking Analysis (see Appendix PKG).

Draft EIR, Section 5.15 Transportation and Traffic, the table source date at the end of Tables 5.15-1, 5.15-2, 5.15-5, 5-15-6, 5.15-7, 5-15-8, 5.15-11, 5-15-12, 5.15-13, 5-15-14, 5.15-15, 5.15-17, 5.15-19, 5.15-21, 5.15-22, 5.15-23, 5.15-24, 5.15-25, 5.15-26, 5.15-27, 5.15-28, 5.15-29, 5.15-31, 5.15-32, 5.15-33, 5.15-34, 5.15-35, and 5.15-36 is revised from "August 2017" to "September 2018" to reflect the date of the revised TIA.

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-8, first paragraph, the reference to Appendix TIA is revised to Appendix TIA-REV, as follows.

> For analysis of potential impacts of the proposed Project based on the traditional congestion-based methodology used in the Transportation Impact Analysis (TIA), study intersections, freeway segments, and freeway ramps were selected by identifying locations where the Project would contribute a noticeable amount of traffic, using a three-step screening process summarized below (a detailed description is provided in Section 1.2.1 of the TIA in Appendix TIA-REV).

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-13, first paragraph, first sentence under the heading Methodology for Identifying Residential Streets for Study, the reference to Appendix TIA is revised to Appendix TIA-REV, as follows.

> Multiple neighborhoods were considered for analysis, including five in the City of Palo Alto, three in the City of Menlo Park, and three in the City of East Palo Alto. Based on the effectiveness of existing traffic calming strategies in those neighborhoods (described in Section 8.3 of the TIA in Appendix TIA-REV), the current conditions within the neighborhoods, and the expected trip distribution and assignment of traffic from the proposed Project, two neighborhoods in Palo Alto (College Terrace and Crescent Park) were identified as locations where neighborhood traffic impacts might occur due to the Project.

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-28, second paragraph, last sentence, the reference to Appendix TIA is revised to Appendix TIA-REV, as follows.

> Details of bus routes are presented in Table 4-10 of the TIA in Appendix TIA-REV, which summarizes the weekday destinations, hours of operation, and service frequencies for transit services within a 2,000-foot walking distance of the Stanford campus.

Draft EIR, Section 5.15 Transportation and Traffic, in the row for Intersection ID No. 83 (Charleston Road / San Antonio Road) in Table 5.15-1, page 5.15-11; Table 5.15-2, page 5.15-17; Table 5.15-19, page 5.15-81; and page Table 5.15-29, page 5.15-119 - the jurisdiction is changed from Mountain View to Palo Alto in response to Comment A-MV-1 as follows:

> Palo Alto~~Mountain View~~ (SC CMP)

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-31, the following text is inserted following the end of the first paragraph in response to Comment A-SCVTA-6.

> VTA's "Next Network" Transit Service Plan goals are to connect with the new Milpitas and Berryessa BART stations, increase ridership, and improve cost-effectiveness. VTA proposes changes to the existing transit routes for the following route lines by 2018:
>
> - Route 35 will be replaced with new Route 21, operating at a 30-minute frequency every weekday.
> - Route 104 will be re-routed to serve Milpitas BART Station rather than Great Mall Transit Center.

Draft EIR Section 5.15 Transportation and Traffic, pages 5.15-37 and 5.15-38 identified proposed amendments to the CEQA Guidelines to implement SB 743 and discussed OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*. Since publication of the Draft EIR, OPR released a new, (November 2017) version of the proposed amendments to the CEQA Guidelines and OPR released a new (April 2018) Technical Advisory. In addition, on July 2, 2018, modifications to the proposed amendments to the CEQA Guidelines were released. The following changes reflect the date and content of this new information.

Draft EIR Section 5.15 Transportation and Traffic, on page 5.15-37, the text has been modified in the fifth paragraph last sentence as follows:

> The draft amendments to the CEQA Guidelines may be found in Attachment A (Proposed 15-day Modifications) to the California Natural Resources Agency Notice of Public Availability of Modifications to Text of Proposed Regulation and Addendum to the Initial Statement of Reasons and Informative Digest (July 2, 2018)~~the OPR document Revised Proposal on *Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (January 20, 2016)~~.

Draft EIR Section 5.15 Transportation and Traffic, on pages 5.15-37 and 5.15-38, under the topic OPR Technical Advisory on Evaluating Transportation Impacts in CEQA, the text has been modified as follows:

> ### *OPR Technical Advisory on Evaluating Transportation Impacts in CEQA*
>
> Except for the presumption that projects near major transit stops and high-quality transit corridors will not result in significant impacts, the draft CEQA Guidelines themselves do not set forth specific standards to assess whether a project's VMT effect is significant.

Much of the detail is found in a ~~draft~~ Technical Advisory published by OPR dated April 2018.

Where a development project is not presumed to result in a less-than-significant impact, the draft Technical Advisory recommends thresholds for specific types of land uses, including the following:

- *Residential:* A project exceeding ~~both existing city household daily VMT per capita minus 15 percent, and~~ existing regional household daily VMT per capita minus 15 percent~~,~~ may indicate a significant transportation impact.
- *Office*: A project exceeding a level of 15 percent below existing regional daily VMT per employee may indicate a significant transportation impact.
- *Retail:* A net increase in total VMT may indicate a significant transportation impact.
- *Mixed Use:* Lead agencies can evaluate each component independently, and apply the significance threshold for each project type included (e.g. residential and retail). In the analysis of each use, a project may take credit for internal capture.

OPR explains that 15 percent better than existing averages is roughly consistent with the reduction targets set by the California Air Resources Board for the larger metropolitan planning organizations pursuant to SB 375. For development in an unincorporated county, residential VMT that ~~both exceeds 15 percent below existing daily VMT per capita in the aggregate of all incorporated jurisdictions in that county, and~~ exceeds 15 percent below existing regional daily VMT per capita~~,~~ may indicate a significant transportation impact.

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-47, the following bulleted text is inserted after the last bullet of bicycle improvement projects, in response to Comment A-SCVTA-14.

- **Adobe Creek Reach Trail:** West Bayshore Road to Louis Road.

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-62, first paragraph, first sentence the reference to Appendix TIA is revised to Appendix TIA-REV, as follows.

The information presented below summarizes the forecasting process that is discussed in detail in the TIA in Appendix TIA-REV.

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-63, second paragraph, fourth sentence, the reference to Appendix TIA is revised to Appendix TIA-REV, as follows.

The trips were assigned to regional "gateways" using the trip distribution information described in the TIA (see Appendix TIA-REV).

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-63, the following text is inserted following the end of the second paragraph in response to Comments A-PA-104 and A-PA-105.

It is noted that the 2018 Baseline roadway network includes the following planned improvements:

- US 101 both directions: one additional HOV 2+ lane (for two total) in each direction from University Avenue to SR 85
- US 101 both directions: one additional auxiliary lane from Marsh Road to SR 85

Modeling conducted for the Draft EIR Cumulative 2035 Conditions assumed Page Mill Road would have six travel lanes based on VTA's 2040 traffic model. Subsequently, VTA staff indicated that inclusion of the 6-lane configuration had been an error on the part of VTA.[3] Accordingly, the model was revised to assume no change to the existing 4-lane configuration for Page Mill Road, and the results have been updated. The Draft EIR Section 5.15 Transportation and Traffic, last paragraph on page 5.15-63 is revised to reflect this change to VTA's 2040 traffic model:

The 2035 Cumulative results were reviewed for reasonableness, and adjustments were made to the model input files to ensure traffic growth at the various intersections and freeway segments in the study area reasonably reflect the land use growth in the model. In addition, subsequent to circulation of the Draft EIR, the VTA's 2040 traffic model was revised to maintain the existing 4-lane configuration for Page Mill Road because the VTA indicated the 6-lane configuration had been an error on the part of VTA.

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-63, the following paragraph is inserted after the last paragraph in response to Comments A-PA-104 and A-PA-105:

It is noted that the 2035 Cumulative model roadway network includes the following planned improvements, relative to the network in the 2018 Baseline model:

- US 101 both directions: 1 additional HOV 3+ lane (2 total) in each direction from Whipple Road to I-680
- US 101 both directions: 1 additional auxiliary lane from Marsh Road to SR 85
- I-280 both directions: 1 additional lane (4 total) in each direction between El Monte Road and Magdalena Avenue
- I-280 both directions: convert HOV 2+ lane to HOV 3+ lane between Magdalena Avenue and I-680
- SR 85 both directions: 1 additional HOV 3+ lane (2 total) between I-280 and SR 87
- SR 85 both directions: convert HOV 2+ lane to HOV 3+ lane between I-280 and SR 87
- Signalization of Intersections 13 and 14

[3] Email dated 10/3/17 from George Naylor (Santa Clara County VTA) to Ananth Prasad (Santa Clara County Roads and Airports), forwarded via David Rader (County of Santa Clara Planning Department) to Ellen Poling (Fehr & Peers) on 10/19/18.

Draft EIR Section 5.15 Transportation and Traffic, pages 5.15-72 to 5.15-73, a number of revisions are made to Mitigation Measure 5.15-1. The first bulleted paragraph on page 5.15-72 is revised to reflect submittal and advance coordination per VTA's Bus Stop Relocation Policy, in response to Comment A-SCVTA-2. The fourth bulleted paragraph on page 5.15-72 is revised in response to Comment A-PA-85 to reflect the inclusion of informing the Palo Alto Police Department of construction locations. The second bulleted paragraph on page 5.15-73 to is revised in response to Comment A-SMC-25 to include truck routes in San Mateo County if San Mateo County designates such routes. A number of other County-initiated changes are also made to further clarify the measure:

Mitigation Measure 5.15-1: *Construction Traffic Control Measures.* The following traffic control measures are required to address impacts from construction of individual 2018 General Use Permit projects.

- ***Protection and Maintenance of Public Transit Access and Routes***. Stanford and its contractors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, during project construction without prior approval from the VTA and~~or~~ other affected~~appropriate~~ jurisdictions. Such approvals shall require submittal and advance coordination per VTA's Bus Stop Relocation Policy~~approval~~ of a mitigation plan to reduce transit~~specific~~ impacts to a less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing public transit bus stops, limiting access to public transit bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.

- ***Maintenance of Pedestrian Access***. Stanford and its contractors shall be prohibited from substantially limiting pedestrian access to properties or facilities ~~in those affected jurisdictions~~ during construction of the project, without prior approval from ~~those~~ the affected jurisdictions. Such approvals shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting p~~P~~edestrian~~s~~ access ~~limiting actions would~~ include, but are not ~~be~~ limited to, sidewalk closures, bridge closures, crosswalk closures, ~~or~~ pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians ~~during the construction period~~. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided if determined by the County to be needed for pedestrian safety.

- ***Maintenance of Bicycle Access***. Stanford and its contractors shall be prohibited from substantially limiting bicycle access to properties or facilities ~~in those affected jurisdictions while~~ during construction~~g~~ of the project, without prior approval from those jurisdictions. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting b~~B~~icycle access ~~limiting actions would~~ include, but are not ~~be~~ limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists ~~during the construction period~~.

- ***Protection and Maintenance of Emergency Service Access and Routes***. Stanford shall inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and shall designate alternate evacuation and emergency routes ~~shall be designated~~ to maintain response times during construction periods.

- ***Parking for Construction-Related Vehicles***. Stanford shall ~~be required to~~ provide adequate on-campus parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the Stanford campus, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site.

- ***Restriction on Construction Delivery Hours***. Stanford shall make feasible attempts to avoid~~limit the number of~~ construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between ~~the hours of~~ 4:30 PM and 6:00 PM.

- ***Construction Truck Routes***. Stanford shall ~~be required to~~ deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. Heavy construction vehicles shall be prohibited from accessing the site from ~~other~~ routes that the Cities of Palo Alto, Menlo Park, or County of San Mateo have prohibited for use by such vehicles. Stanford shall provide written notification to all contractors regarding appropriate routes to and from construction sites and the weight and speed limits for local roads used to access construction sites. A copy of all such written notifications shall be submitted to the County Planning Office.

- ***Phone Number for Complaints***. Stanford shall post at least one sign no smaller than 1,296 square inches at all active construction sites. The sign shall contain the name, ~~and~~ telephone number and~~or~~ e-mail address of the appropriate Stanford person the public may contact to report alleged violations of this mitigation measure or to register complaints about construction traffic associated with building projects under the 2018 General Use Permit. Stanford shall keep a written record of all such complaints and shall provide copies of these records to the County Planning Office as part of the annual report process.

- ***Construction Impact Mitigation Plan***. In lieu of the above mitigation measures, Stanford may submit a detailed construction impact mitigation plan to the County for review and approval prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. If Stanford determines that it is not feasible to comply with the "Restriction on Construction Delivery Hours" above, then the plan shall also explain the basis for this infeasibility determination. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved.

- ***Construction During Special Events***. Stanford shall ~~implement a mechanism to~~ prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events~~, which~~ that attract a substantial number of visitors to the campus. This measure may require a special supplemental permit to be obtained to host such events during significant construction phases.

Significance after Mitigation: Less than Significant.

Draft EIR Section 5.15 Transportation and Traffic, the following text is added following the third paragraph of Impact 5.15-2 on page 5.15-74 to address mitigation for reverse peak direction trips.

> Mitigation Measure 5.15-2(a) addresses peak hour, peak direction project impacts, with fair share mitigation fees triggered if the "no net new commute trips" standard is not achieved, while Mitigation Measure 5.15-2(b) addresses peak-hour, off-peak (reverse commute) direction impacts, which are not subject to the "no net new commute trips" standard and, therefore, fair share mitigation fees are triggered upon project approval.[7a]
>
> [7a] Fehr and Peers, 2018 Stanford General Use Permit: Reverse-Commute Analysis, Appendix RCA.

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-74, and pages 5.15-83 to 5.15-90, a number of revisions are made to Mitigation Measure 5.15-2. This includes:

- a number of County-initiated changes made to clarify the original mitigation measure [revised as Mitigation Measure 5.15-2(a)];
- a number of revisions are made to Table 1 (Study Intersection Mitigation Measures under 2018 General Use Permit), including:
  - for Intersection #17 (Junipero Serra Boulevard – Foothill Expressway / Page Mill Road), a revision to the mitigation measure description is made to reflect the previously described changes to the VTA 2040 traffic model regarding Page Mill Road lane configurations;
  - for Intersection #31 (Foothill Expressway / San Antonio Road), a volume error has been corrected. After correction to the PM peak hour traffic volume in the 2018 Baseline case, Intersection #31 is no longer significantly impacted in the Baseline (2018) With Project scenario. Therefore, in Table 1, the box checked with an "X" under 2018 Baseline with Project Conditions is deleted;
  - for Intersection # 89 (Central Expressway / Moffett Boulevard), in response to Comment A-MV-2, text is added to the mitigation measure description;
  - other minor miscellaneous edits; and
- a new Mitigation Measure 5.15-2(b) (including new Table 2) is added to the mitigation measure to address reverse commute impacts, in response to Comment A-MP-17.

Revised Mitigation 5.15-2 is presented in its entirely below:

Mitigation Measure 5.15-2(a): Stanford shall mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of fair share fees for the ~~funding equivalent to Stanford's proportionate share of the cost of~~ improvements for adversely affected intersections specified in Table 1 [minus the contribution to these improvements provided pursuant to Mitigation Measure 5.15-2(b), below], which funds shall be expended by the County to fund ~~transportation~~ mitigation efforts.

1. As specified on page 64 and Policy C-1 of the Stanford Community Plan, the no net new commute trips standard is defined as no increase in automobile trips during peak commute times in the peak commute direction, as counted at defined cordon locations around the central campus. The peak commute period is defined as the one-hour period in the morning (AM) and afternoon (PM) ~~of time~~ with the highest volume of traffic at the cordon locations, as determined by ~~the~~ traffic counts.

2. The reasonable cost of all traffic counts and other work conducted for determination of compliance with this mitigation measure shall be paid for by Stanford. The counts shall be performed by an independent consultant under the direction of the County Planning Office or provided to the County Planning Office through another County-approved methodology.

3. The baseline for measuring the no net new commute trips standard shall be the count that was established in 2001. However, during implementation of the 2018 General Use Permit, the County may modify, or approve Stanford-proposed modifications to ~~Stanford may propose to change~~ the monitoring methodology on new technology such as automation~~, subject to review and approval by the County Planning Office and in accordance with County requirements~~, so long as the basic principles underlying the no net new commute trips standard are still met. If the monitoring methodology is updated, testing and calibration of the new methodology or equipment will require coordination with the County. The County may adjust the 2001 baseline ~~data will be adjusted~~ as needed to reflect any such calibration. Monitoring counts shall be performed each year using the County-approved methodology.

4. Traffic counts and determination of traffic volumes shall occur as described below, unless modifications are approved by the County Planning Office.

    a. Peak-hour traffic for a single year shall be determined through counts taken at two times during the year. All counts shall be conducted during the regular academic year, which does not include academic breaks or end-of-quarter finals. Homecoming or other irregular traffic patterns should be avoided. Specific dates for each count shall be determined by the County Planning Office. The two annual counts shall be averaged to determine the annual traffic level for each monitoring year.

        i. During monitoring periods~~the AM peak hour and the PM peak hour~~, the total amount of traffic crossing the cordon line will be counted by travel direction. The cordon count monitoring will be conducted on a 24-hour basis~~from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM~~. The morning (AM) and afternoon (PM) peak hours within the 24~~two~~-hour count period will be calculated based on total volumes to determine the campus-wide peak hours.

TABLE 1
STUDY INTERSECTION MITIGATION MEASURES UNDER 2018 GENERAL USE PERMIT

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Project Conditions	2035 Cumulative with Project Conditions
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	Contribute fair share funding toward the addition of second northbound right-turn lane, as identified in the ConnectMenlo Final Environmental Impact Report.	X	X
13	I-280 SB Off-Ramp / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a traffic signal.	X	
17	Junipero Serra Blvd – Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward installation of an overlap signal phase for northbound and southbound right-turning vehicles and widening of the southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane. <u>Contribute fair-share funding toward the installation of a third westbound through lane and associated receiving lane with a westbound right-turn overlap phase.</u>	X	X
19	Hanover St / Page Mill Rd – Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a second westbound left-turn lane, identified as an option in the Page Mill Expressway Corridor Study Report.		X
20	El Camino Real / Page Mill Rd - Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two ~~extended~~ left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report.		X
21	Middlefield Rd / Oregon Expy	Santa Clara County (SC CMP)	No feasible mitigation measure.		X
29	Foothill Expy / Hillview Ave	Santa Clara County	No feasible mitigation measure.		X
30	Foothill Expy / Arastradero Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward a grade separation improvement project, as identified in the draft Santa Clara County Expressway Plan 2040. The grade separation assumes inclusion of a separated through-way for vehicles on Foothill Expressway.	X	X
31	Foothill Expy / San Antonio Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the addition of a third southbound through lane on Foothill Expressway between San Antonio Road and El Monte Avenue as identified in the draft Santa Clara County Expressway Plan 2040.	~~X~~	X

TABLE 1 (CONTINUED)
STUDY INTERSECTION MITIGATION MEASURES UNDER 2018 GENERAL USE PERMIT

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Project Conditions	2035 Cumulative with Project Conditions
32	Foothill Expy / El Monte Ave	Santa Clara County (SC CMP)	Contribute fair share funding toward the addition of a third northbound through lane and associated receiving lane that extends to San Antonio Avenue, as identified in the draft Santa Clara County Expressway Plan 2040.		X
33	Foothill Expy / Springer Road - Magdalena Ave	Santa Clara County (SC CMP)	Contribute fair share funding toward the following improvements, as identified as a Tier 2 improvement in the draft Santa Clara County Expressway Plan 2040: • Convert the signal to provide 8-phase phasing; • Change the lane configuration for the east leg to have two left-turn lanes, one through lane, and one right-turn lane; and • Change the configuration for the west leg to have one left-turn lane, two through lanes, and one right-turn lane.		X
37	El Camino Real / Encinal Ave	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
38	El Camino Real / Valparaiso Ave	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
41	El Camino Real / Ravenswood Rd	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
48	El Camino Real / Embarcadero Rd	Palo Alto (SC CMP)	Contribute fair share funding toward the addition of a second northbound left-turn lane.		X
56	Alma St / Hamilton Ave	Palo Alto	Contribute fair share funding toward the reconfiguration of the westbound approach to have one left-turn lane and one right-turn lane, by removing a portion of the parking.		X
58	Alma St / Charleston Rd	Palo Alto	Contribute fair share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.	X	X
59	Middlefield Rd / Marsh Rd	Atherton	Contribute fair share funding toward the addition of a second westbound left-turn lane and second receiving lane on the south leg.		X
63	Middlefield Rd / Lytton Ave	Palo Alto	No feasible mitigation measure.		X
66	Middlefield Rd / Embarcadero Rd	Palo Alto	No feasible mitigation measure.		X

TABLE 1 (CONTINUED)
STUDY INTERSECTION MITIGATION MEASURES UNDER 2018 GENERAL USE PERMIT

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Project Conditions	2035 Cumulative with Project Conditions
89	Central Expy / Moffett Blvd	Santa Clara County (SC CMP) ~~Mountain View~~	The City of Mountain View's planned closure of Castro Street at the train tracks to form a T-intersection of Central Expressway and Moffett Boulevard would mitigate the Project impact (Mountain View Transit Center Master Plan). The effects of this project are shown in the mitigation columns to the right. If the Castro Street closure project is not implemented, the secondary, back-up mitigation is to contribute fair-share funding toward the construction of a second southbound left turn lane from Central Expressway to Moffett Boulevard. Stanford shall contribute its fair-share funding toward the second southbound left-turn lane from Central Expressway to Moffett Boulevard. The funding can be used for the Castro Street closure project.		X
90	Foothill Expressway / Edith Avenue	Santa Clara County (SC CMP)	No feasible mitigation measure.		X

ii. All counts shall be taken at the campus entry and exit points shown in Figure 5.15-2, which together form the defined cordon line. Additional cordon gateways may be added or the location of the cordon line may be modified as determined by the County.

a) Traffic counts shall include a methodology to determine the rate of cut-through traffic.

1) ~~All vehicles will need to be identified in order that cut-through trips can be removed from the total volume.~~ Cut-~~T~~through trips will be identified through license plates on each vehicle or other means. Entry and exit t~~T~~imes will be noted ~~in order~~ to determine when a vehicle crosses the cordon in either direction.

2) Matching license plates will be determined by comparing numbers that crossed both an entering and exiting cordon within a defined period (i.e.~~e.g.~~, 20 minutes or as updated), or through other means. Vehicles that enter and exit the cordon within the time period will be cut-through trips across the campus without a campus-related purpose. If data are available or it is feasible to measure, the County will include in the cordon counts all rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs.

b) Cordon volumes will be adjusted to account for use of parking lots within the cordon line by hospital-related traffic and use of lots outside the cordon line by campus-related traffic. Parking areas change due to the evolving needs of campus and hospital operations. The lots used for hospital and university parking shall be confirmed prior to annual surveys. The County reserves the right to change the methodology related to hospital parking or other parking factors in response to changing conditions.

1) Hospital trips will be subtracted from the count and campus trips will be added to the count. The count adjustment will also ~~need to~~ factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hours, data will need to be collected from each lot. If campus parking occurs in lots outside the cordon, trips associated with those vehicles will be added back into the count. If hospital parking occurs inside the cordon, trips associated with those vehicles will be subtracted from the count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots, unless the County approves an alternate protocol for assigning such parking.

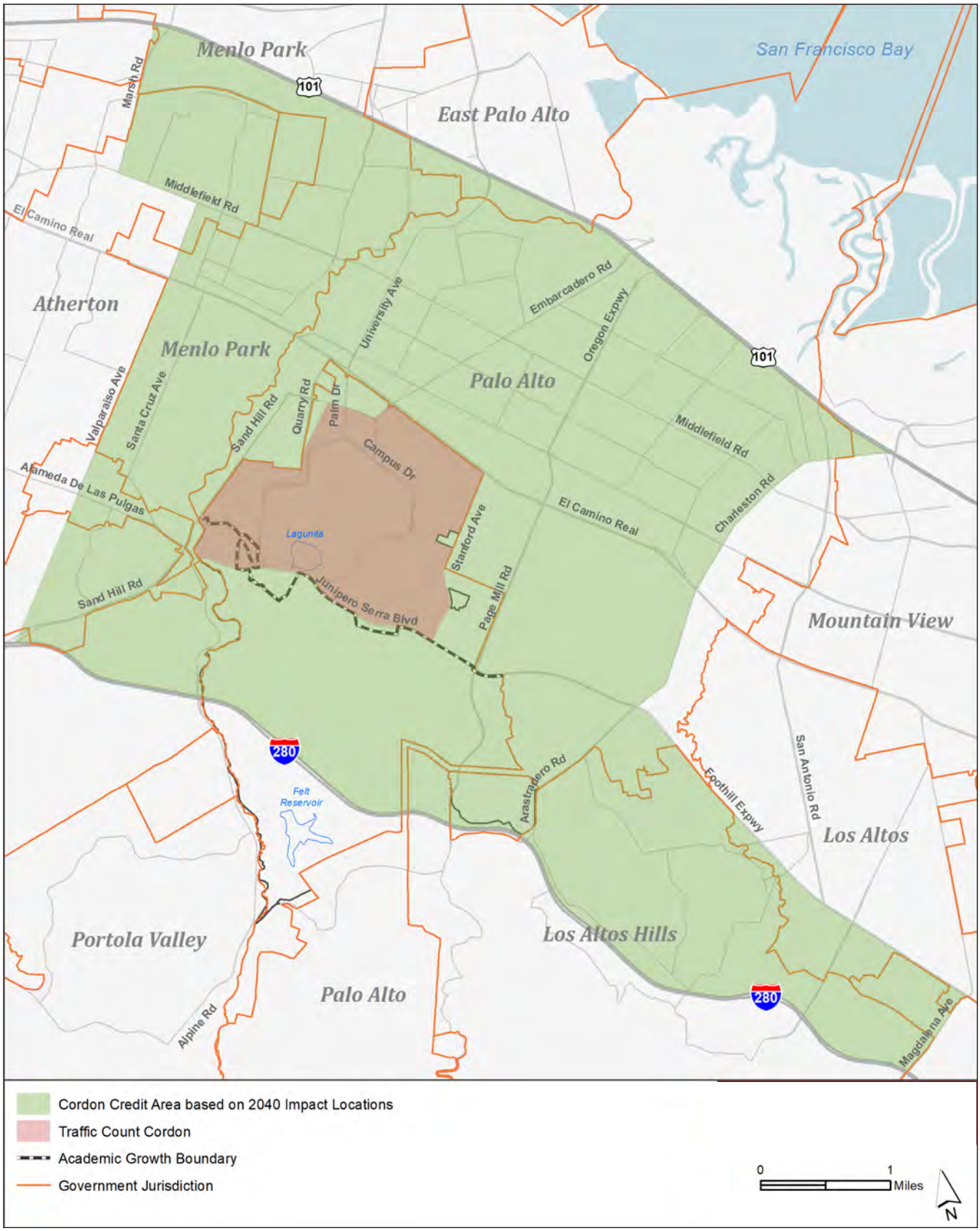
c) Based on the 24-hour counts, the AM and PM ~~a~~ peak hours will be identified for the campus. Peak hour traffic volume will be determined for the campus based on the count, adjusted for cut-through traffic and hospital parking as described above.

1) Total entering and exiting traffic will be summed for the 16 campus gateways. A single AM and PM peak hour will be determined for the

entire campus based on the ~~traffic volumes~~peak inbound traffic in the AM period and the peak outbound traffic in the PM period. The percent of cut-through trips calculated by the license plate matching (or other technology) described above will be removed. With the exception of rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs, ~~T~~the cut-through vehicles will be removed from both the inbound and the outbound traffic since they will have been observed crossing both an entering and exiting cordon boundary. Finally, the entering and exiting traffic for hospital uses inside the cordon boundary and the campus uses outside the cordon boundary calculated as described above will be subtracted from or added to the counts.

5. As specified by Community Plan Policy C-8, the County Planning Office will recognize participation by Stanford in off-campus trip reduction efforts and credit those reduced trips towards Stanford's attainment of the no net new commute trips standard. Stanford shall receive credit commensurate with the actual number of trips reduced outside the cordon due to Stanford's direct efforts, ~~and~~or the proportion of the cost of the program ~~that~~to which Stanford is contributing. A reduction of an off-campus trip ~~can~~may be recognized as long as at least one terminus for the trip is within the area shown on **Figure 5.15-8**. The County Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate. Such proposals shall be submitted by Stanford to the County Planning Office for review, modification and ~~consideration of~~potential approval. The proposals shall be presented to the Community Resource Group prior to any determination by the County Planning Office. Once the County Planning Office has accepted the proposal and the program implementation begins, the County Planning Office will identify, at Stanford's cost, the number of trips reduced outside the cordon and ~~factor a~~ calculate~~ion of the~~ a trip reduction credit ~~into its~~ for application toward attainment of ~~Stanford's annual compliance with~~ the no net new commute trips standard, with the continuing requirement that Stanford provide evidence of its participation in the ongoing program in a manner that can be independently verified. The County reserves the right to further regulate Project-generated trips and the use of trip credits through the Conditions of Approval for the General Use Permit.

   Funding of off-campus circulation infrastructure improvements may also ~~will~~ qualify for trip credits if ~~as long as~~ the improvements will enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area, and thereby remove vehicular trips from the local impact area. For example, funding roadway widening or modifications to add transit vehicle or bicycle lanes or to add signals to improve pedestrian or bicycle safety could qualify for trip credits under this approach if approved by the County. Any proposal for such credits shall be accompanied by substantial evidence demonstrating that~~how~~ the infrastructure project would remove vehicular trips from the local impact area. Once the County Planning Office has approved infrastructure improvement project for a trip reduction credit, the project has been implemented, and the trip reductions have been verified, the trip reduction credit will be factored into the County's conclusion regarding Stanford's annual compliance with the no net new commute trips standard in each subsequent year.



Stanford 2018 General Use Permit . 160531

SOURCE: Stanford LBRE LUEP

Figure 5.15-8
Revised Cordon Credit Area

Each year, the County will report Stanford's trip credits in its annual monitoring report. The County will track and calculate trip reduction credits in a manner designed to ensure that credits benefit the three geographic sub-areas surrounding the Stanford campus (north, east, and south/southwest) in rough proportion to the 2018 General Use Permit trip assignment forecasted in the Draft EIR. Trip reduction credits with area-wide benefit will be tracked separately from trip reduction credits with sub-area geographic benefits.

6. The County Planning Office shall monitor the cordon counts using the procedures described above. If the cordon counts, as modified by trip reduction credits, exceed the baseline volume by 1% or more for any two out of three consecutive years, mitigation of impacts to intersections in the form of fair share payments will be required, implementing Stanford Community Plan Implementation Recommendation C(i)(9). Table 1 identifies the intersection impacts that could occur if the no net new commute trips standard is not achieved, and the physical improvements that would substantially reduce each impact.

   ~~a. Prior to the first year of cordon count monitoring under the 2018 General Use Permit, the County Planning Office will: 1) determine, in consultation with the affected jurisdictions, the cost of the intersection improvements identified in Table 1; 2) identify Stanford's fair share contributions to those improvements based on Stanford's proportionate contribution to the impact from development under the 2018 General Use Permit as compared to the contributions to the impact from background and cumulative traffic at the intersections; and 3) establish a cost-per-trip fee. This fee shall be increased annually to reflect changes in California construction costs (e.g., by applying the relevant Saylor or RS Means construction cost index).~~

      ~~i.~~ Upon the County's ~~its~~ determination that the no net new commute trips standard has been exceeded by 1% or more in two out of three consecutive years, the County will require Stanford to ~~pay~~make its fair share ~~the cost-per-trip fee for each peak hour trip that exceeded the established no net new commute trips standard during the applicable two to three-year time period.~~

      ~~ii. To calculate the annual cost-per-trip fee, the total amount of Stanford's fair share contribution to all intersection improvements will be divided by 17, to reflect the number of years that the 2018 General Use Permit is expected to be in effect. The resulting quotient will then be divided by the total number of peak hour, peak direction vehicle trips anticipated in the EIR to occur absent the no net new commute trips standard.~~

      ~~iii. The annual cost-per-trip fee times the number of trips exceeding the no net new commute trips standard in each of the applicable years (i.e., calculated over two years if the goal is exceeded two out of three years) will constitute the trip payment that Stanford must provide to the County.~~

      ~~iv. In no event would Stanford be required to pay cumulatively over the time period of the 2018 General Use Permit more than the total amount of its fair share~~ contribution toward improvements at adversely affected intersections and roadways based on all exceedances of the "no net new commute trips" standards.

~~b.~~ The County Planning Office will use the intersection improvement ~~trip~~ fees collected from Stanford as follows:

a. The fees shall be used to fund the intersection improvements identified in Table 1. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the fees are used to fund an intersection improvement in another jurisdiction, the County will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.

b. Substitute Mitigation:

~~i. The County Planning Office may elect~~ If the County Planning Office determines that it is not feasible to use the fees for the specified intersection improvements (e.g., it does not appear that there will be full funding for the improvements within a reasonable time; the public agencies with authority or jurisdiction over the improvement projects will not approve the projects), then the fees may be used to fund off-campus projects that encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area, including but not limited to transit improvements that would directly or indirectly ~~would~~ benefit the local impact area. This fund also could be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users provided there is substantial evidence demonstrating how the improvements would remove vehicular trips from the local impact area.

~~ii. The County Planning Office may elect to fund one or more of the intersection improvements identified in Table 1. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the County elects to fund an intersection improvement in another jurisdiction, it will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.~~

Mitigation Measure 5.15-2(b): Stanford shall mitigate the transportation impacts of its additional development and population growth with respect to reverse-commute impacts through the contribution of fair share fees for the cost of improvements for adversely affected intersections specified in Table 2 (a subset of the adversely affected intersections specified in Table 1), which funds shall be expended by the County to fund transportation mitigation efforts in the same manner as provided in Mitigation Measure 5.15-2(a)(6)(a) and (b).

Significance after Mitigation: Significant and Unavoidable.

TABLE 2
STUDY INTERSECTION REVERSE-COMMUTE MITIGATION MEASURES UNDER 2018 GENERAL USE PERMIT

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Project Conditions	2035 Cumulative with Project Conditions	Fair-Share Contribution[a]
13	I-280 SB Off-Ramp / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a traffic signal.	X		12.9%
17	Junipero Serra Blvd – Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward installation of an overlap signal phase for northbound and southbound right-turning vehicles and widening of southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane.	X	X	12.6%
20	El Camino Real / Page Mill Rd - Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two extended left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report.		X	7.3%
41	El Camino Real / Ravenswood Rd	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X	4.3%
58	Alma St / Charleston Rd	Palo Alto	Contribute fair share funding toward the addition of a designated northbound right-turn lane.	X		1.5%

NOTE:

[a] The fair-share contribution is estimated based on the total number of proposed Project reverse-commute direction trips at the intersection divided by the difference between the total cumulative intersection volume and the existing intersection volume. The value presented in this table represents the maximum percentage of the AM and PM peak hours if both peak hours are impacted; the AM percentage if only the AM peak hour is impacted, and the PM percentage if only the PM peak hour is impacted. Additional calculations are provided in Appendix RCA. It should be noted that these percentages are projected based on Baseline and Cumulative projects known at this time, and are subject to change if new projects (i.e., projects not included in Baseline and/or Cumulative analysis scenarios) that would add volumes to the study intersections are approved prior to issuance of the first building permit authorized under the 2018 General Use Permit.

As previously described, the Draft EIR Section 5.15 Transportation and Traffic identified a significant impact under the 2018 Baseline with Project Conditions at Intersection #31, Foothill Expressway/ San Antonio Road. However, that result was due to a volume error that has since been corrected. After correction to the PM peak hour traffic volume in the 2018 Baseline case, Intersection #31 (Foothill Expressway/San Antonio Road) is no longer significantly impacted in the Baseline (2018) With Project scenario. Draft EIR Section 5.15, Table 5.15-19 on page 5.15-77, the PM peak hour results for intersection #31 have been amended as follows (excerpt of table shown):

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2018 Baseline		2018 Baseline With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
31	Foothill Expressway / San Antonio Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	18.7 75.8~~79.6~~	B- E-	19.2 78.5**~~82.7~~**	B- E-~~**F**~~	0.016 0.021~~2~~	0.6 4.0~~7~~

In addition, Draft EIR Section 5.15 Transportation and Traffic, in Table 5.15-20 page 5.15-83, the following text has been deleted as follows (excerpt of table shown):

Intersection	Significance Criteria (Threshold of Significance) Exceeded
~~#31 Foothill Expressway / San Antonio Road (PM Peak Hour)~~	~~**VTA:** Project-generated traffic would cause a degradation from an acceptable LOS E to an unacceptable LOS F.~~

Draft EIR Section 5.15 Transportation and Traffic page 5.15-92 to 5.15-93, the entire bullet describing the mitigation for Intersection #17 under Baseline (2018) With Project conditions is revised to reflect the previously described changes made to VTA's 2040 traffic model regarding Page Mill Road lane configuration, as follows:

- **Intersection #17: Contribute fair-share funding to the installation of an overlap signal phase for northbound and southbound right-turning vehicles at the signalized intersection of Junipero Serra Boulevard – Foothill Expressway / Page Mill Road; ~~and~~ widening of southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane; and addition of a third westbound through lane and associated receiving lane and installation of a westbound right turn overlap phase.**

  Installation of an overlap phase for northbound, ~~and~~ southbound and westbound right-turning vehicles would be accommodated through the modification of the existing traffic signal. Widening southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road likely would require the acquisition of additional right-of-way. This improvement would allow southbound right-turning vehicles additional queuing space so that southbound through vehicles do not block

the right-turn lane. The new westbound through lane and receiving lane would require some right-of-way from the subdivision corner (northeast corner) and along the dish parcel for the receiving lane (northwest corner).

Implementation of this mitigation measure would reduce the impact to a less-than-significant level. However, because this improvement may require additional funding that has not yet been identified, it is not certain that this improvement would be implemented in a timely manner such that the contribution of the proposed Project to the cumulative impact is reduced to less than considerable. Therefore, the impact would remain significant and unavoidable.

***Impacts of Mitigation*:** The mitigation would not have a substantial adverse effect on bicycle and pedestrian StreetScore+ QOS, as they would remain unchanged at QOS 3.5 and QOS 4, respectively. With the proposed mitigation, a second lane would be added traveling southbound between Stanford Avenue and Page Mill Road, aligning with the existing designated southbound right-turn lane at Page Mill Road, and would not impact the existing intersection configuration of the southbound approach. A third through lane would be added to the westbound approach and continued on the westbound receiving lanes, requiring additional right-of-way, and increasing the pedestrian crossing distance on the east and west legs of the intersection. In addition, the north/south bicycle crossing distances would increase slightly due to the additional through lane while maintaining but not exacerbating the current uncomfortable conditions for bicyclists and pedestrians at the intersection. ~~The proposed mitigation would not alter the existing intersection configuration (only lengthening the existing right-turn lane). The pedestrian crossing distances would remain unchanged.~~

It is noted that there are improvements identified for this intersection in the draft *Santa Clara County Expressway Plan 2040.* The first improvement, which is a Tier 1 (highest priority) improvement, would widen Page Mill Road from just east of Junipero Serra Boulevard-Foothill Expressway to the I-280 ramps. This improvement is fully funded through Measure B but conservatively is not ~~and is~~ anticipated to be in place by 2035.

The second improvement, which is a Tier 3 (lowest priority) improvement, is to eliminate the intersection by grade-separating Page Mill Road above Junipero Serra Boulevard – Foothill Expressway. The grade separation improvements were not identified as a mitigation for the proposed 2018 General Use Permit project because the mitigation measure for Intersection #17 which is a smaller project and would have fewer secondary environmental effects, mitigates the proposed Project's contribution to the cumulative impact to a less-than-considerable level by 2035. In addition, the grade separation project has not completed CEQA review, may not be approved, and may not receive funding.

The Draft EIR Section 5.15, Transportation and Traffic, identified a significant impact under the 2018 Baseline with Project Conditions at Intersection #31, Foothill Expressway/ San Antonio Road. However, that result was due to a volume error that has since been corrected. After correction to the PM peak hour traffic volume in the 2018 Baseline, Intersection #31 (Foothill Expressway/San Antonio Road) is no longer significantly impacted in the Baseline (2018) With Project Conditions.

Accordingly, Draft EIR Section 5.15, on pages 5.15-93 and 5.15-94, the following text has been deleted:

- ~~**Intersection #31: Contribute fair-share funding to the addition of a third southbound through lane on Foothill Expressway between San Antonio Road and El Monte Avenue.**~~

  ~~A third receiving lane would be added on the south leg of Foothill Expressway, as identified as a Tier 1 improvement in the draft Santa Clara County Expressway Plan 2040, to extend the southbound right-turn lane from El Monte Avenue to San Antonio Road, which likely would require additional right-of-way.~~

  ~~Implementation of this mitigation measure would reduce the impact to a less-than-significant level. However, because this improvement may require additional funding that has not yet been identified, it is not certain that this improvement would be implemented in a timely manner such that the proposed Project's impact is mitigated. Therefore, the impact would remain significant and unavoidable.~~

  ~~***Impacts of Mitigation:*** The mitigation would not have a substantial adverse effect on bicycle QOS, which would remain unchanged at QOS 4. With the proposed mitigation, right-turn slip lanes and high vehicle turning speeds would remain, maintaining the current uncomfortable environments for bicyclists at the intersection. The proposed mitigation measure would have no effect on pedestrian quality of service as there is no pedestrian access at this intersection.~~

  ~~It is noted that the full Tier 1 intersection improvement identified for this intersection in the draft Santa Clara County Expressway Plan 2040 includes widening Foothill Expressway from four to six lanes between San Antonio Road and El Monte Avenue. The mitigation measure identified for Intersection #31 would implement the southbound widening~~.

Draft EIR Section 5.15 Transportation and Traffic, Table 5.15-21 on page 5.15-95, the row for Intersection 31 (Foothill Expressway/San Antonio Road) is deleted (see following table).

Draft EIR Section 5.15 Transportation and Traffic, Table 5.15-21 on page 5.15-95, references to MM 5.15.2 are revised to read MM 5.15-2(a), to correlate with the previously described revisions to Mitigation Measure 5.15-2 (see following table).

TABLE 5.15-21
2018 BASELINE WITH PROJECT INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2018 Baseline		2018 Baseline With Project		Mitigation Measure	2018 Baseline With Project (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**119.6** 21.2	**F** C+	**137.4** 21.4	**F** C+	See MM 5.15-2(a) (Table 1)	46.5 18.3	D B-	LTS/SU
13	I-280 SB Ramps / Page Mill Road	Santa Clara County	LOS E (Warrant)	AM PM	**151.7** **85.9**	**F** **F**	**153.3** **88.3**	**F** **F**	See MM 5.15-2(a) (Table 1)	37.2 42.3	D+ D	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**97.2** **97.0**	**F** **F**	**101.5** **109.9**	**F** **F**	See MM 5.15-2(a) (Table 1)	**97.3~~98.6~~** **97.7~~103.8~~**	**F** **F**	SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	71.8 **92.3**	E **F**	74.7 **95.8**	E **F**	See MM 5.15-2(a) (Table 1)	60.2 67.9	E E	LTS/SU
~~31~~	~~Foothill Expressway / San Antonio Road~~	~~Santa Clara Co. (SC CMP)~~	~~LOS E~~	~~AM PM~~	~~18.7 79.6~~	~~B- E-~~	~~19.2 **82.7**~~	~~B- **F**~~	~~See MM 5.15-2 (Table 1)~~	~~19.2 21.1~~	~~B- C+~~	~~LTS/SU~~
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	**55.2** 55.0	**E+** D-	**55.7** **55.9**	**E+** **E+**	See MM 5.15-2(a) (Table 1)	54.7 54.8	D- D-	LTS/SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

a Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.
b LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.
c AM = morning peak traffic hour, PM = evening peak traffic hour.
d Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
e LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.
f LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection;
SU = significant and unavoidable.

SOURCE: Fehr & Peers, September 2018~~August 2017~~.

Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-3, to correlate with the previously described revisions to Mitigation Measure 5.15-2, the paragraph following the third bullet on page 5.15-96, fourth sentence, Mitigation Measure 5.15-2 is revised as Mitigation Measure 5.15-2(a), as follows:

> However, Mitigation Measure 5.15-2(a) would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fees from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips.

Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-3 on page 5.15-100, to correlate with the previously described revisions to Mitigation Measure 5.15-2, described above, Mitigation Measure 5.15-2 is revised as Mitigation Measure 5.15-2(a), as follows:

> **Mitigation Measure:** Implement Mitigation Measure 5.15-2(a).

Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-3, to correlate with the previously described revisions to Mitigation Measure 5.15-2, on page 5.15-100, following the statement that says Significance after Mitigation: Significant and Unavoidable, the second sentence of the is revised as follows:

> Mitigation Measure 5.15-2(a) would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fees from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips.

Draft EIR, Section 5.15 Transportation and Traffic, page 5.15-102, the last sentence of the first paragraph following the impact statement for Impact 5.15-5, the reference to Appendix TIA is revised to Appendix TIA-REV, as follows.

> The index and associated traffic thresholds relative to existing volumes are included in Appendix N of the TIA, in Appendix TIA-REV in in this EIR).

Draft EIR Section 5.15 Transportation and Traffic on page 5.15-110, first paragraph, the following text has been added to explain that the analysis also addresses cumulative impacts:

> . . . As shown in Table 5.15-28, the effect of the proposed Project would not surpass the 0.1 change in TIRE index on any of the local residential street segments evaluated in this analysis, and the impact would be less than significant. It should be noted that since the TIRE indices are based on the effect of the Project as a percentage of total traffic, the Project's effect on cumulative traffic conditions would be even less, and similarly less than significant.

Draft EIR Section 5.15 Transportation and Traffic on page 5.15-111, second paragraph, the following text has been added to explain that the analysis also addresses cumulative impacts:

> . . . Therefore, the identified significant impacts at area intersections would not result in inadequate emergency access within the study area, and the impact on emergency access under the Project and cumulative conditions would be ~~is~~ less than significant.

Draft EIR Section 5.15 Transportation and Traffic on page 5.15-112, second paragraph, the following text has been added to explain that the analysis also addresses cumulative impacts:

> For the above reasons, the proposed Project's impact on pedestrian and bicycle facilities under Project and cumulative conditions would be less than significant.

Draft EIR Section 5.15 Transportation and Traffic, Table 5.15-29 is revised to reflect modification of the VTA's 2040 traffic model to remove an erroneous change to the configuration for Page Mill Road. Please note that none of the significant impact findings change with the new results. For readability purposes, the entire table was replaced with a revised Table 5.15-29 (see following pages).

Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-9 on page 5.15-121, the mitigation measure for Impact 5.15-9 is revised to correlate with the previously described revisions to Mitigation Measure 5.15-2:

> **Mitigation Measure:** Implement Mitigation Measure 5.15-2(a)-(b).

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-123, the first paragraph is revised to address mitigation for reverse commute impacts, in response to Comment A-MP-17, and contains minor changes as follows:

> As detailed in Mitigation Measure 5.15-2(a), Stanford shall mitigate the peak hour, peak direction transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of funding equivalent to Stanford's fair ~~proportionate~~ share of the cost of improvements for adversely affected intersections, which funds shall be expended by the County to fund transportation mitigation efforts. Further, Mitigation Measure 5.15-2(b) requires that Stanford mitigate the peak-hour, off-peak direction (reverse commute) transportation impacts of its additional development and population growth through the contribution of funding equivalent to Stanford's fair share of the cost of improvements for adversely affected intersections, which funds shall be expended by the County to fund transportation mitigation efforts.

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-123, the second sentence in the paragraph following Significance after Mitigation is revised to read Mitigation Measure 5.15-2(a), to correlate with the previously described revisions to Mitigation Measure 5.15-2:

> As discussed in further detail below, many of the intersections adversely affected under 2035 Cumulative with Project conditions identified in Table 1 in Mitigation Measure 5.15-2(a) are located in other jurisdictions, and consequently, the improvements depend on the actions of those jurisdictions.

TABLE 5.15-29
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
1	I-280 NB On-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	10.3 12.6	B+ B	10.1 13.7	B+ B	0.015 0.032	-0.2 1.2
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**136.9** 18.4	**F** B-	**155.2** 18.6	**F** B-	**0.038** 0.021	**19.2** 0.2
3	Addison Wesley / Sand Hill Rd	Menlo Park	LOS D	AM PM	37.9 21.5	D+ C+	49.6 22.3	D C+	0.037 0.032	18.3 1.4
4	Saga Ln / Sand Hill Rd	Menlo Park	LOS D	AM PM	19.4 30.1	B- C	19.6 29.8	B- C	0.036 0.031	0.5 -0.2
5	Sharon Park Dr / Sand Hill Rd	Menlo Park	LOS D	AM PM	17.4 18.9	B B-	17.4 18.6	B B-	0.036 0.032	0.3 0.0
6	Alameda de las Pulgas / Santa Cruz Ave	San Mateo County	LOS D	AM PM	13.3 14.6	B B	13.3 14.5	B B	0.000 0.000	0.0 0.0
7	Santa Cruz Ave / Sand Hill Rd	Menlo Park	LOS D	AM PM	51.3 46.2	D- D	52.8 47.2	D- D	0.030 0.038	2.1 1.7
8	Oak Ave / Sand Hill Rd	Menlo Park	LOS D	AM PM	10.5 3.9	B+ A	10.5 3.9	B+ A	0.025 0.024	0.1 0.1
9	Stock Farm Rd / Sand Hill Rd	Palo Alto	LOS D	AM PM	24.3 29.4	C C	25.4 30.3	C C	0.028 0.022	1.7 0.9
10	Pasteur Dr / Sand Hill Rd	Palo Alto	LOS D	AM PM	20.7 26.8	C+ C	20.8 27.4	C+ C	0.009 0.017	0.4 0.7
11	Arboretum Rd / Sand Hill Rd	Palo Alto	LOS D	AM PM	25.3 31.7	C C	26.0 32.3	C C-	0.013 0.012	1.3 0.9
12	El Camino Real / Sand Hill Rd	Palo Alto (SC CMP)	LOS E	AM PM	43.8 39.8	D D	43.6 40.3	D D	0.019 0.013	-3.1 0.6
13	I-280 SB Ramps / Page Mill Rd	Santa Clara County	LOS E	AM PM	37.0 44.7	D+ D	37.2 45.0	D+ D	0.003 0.003	0.3 0.2

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
14	I-280 NB Ramps / Page Mill Rd	Santa Clara County	LOS E	AM PM	14.4 12.4	B B	14.5 12.5	B B	0.005 0.004	0.6 0.7
15	Deer Creek Rd / Page Mill Rd	Santa Clara County	LOS E	AM PM	17.5 11.5	B B+	19.1 11.8	B- B+	0.026 0.021	2.7 0.1
16	Coyote Hill Rd / Page Mill Rd	Santa Clara County	LOS E	AM PM	8.9 8.5	A A	9.8 8.9	A A	0.014 0.021	0.0 -0.1
17	Junipero Serra Blvd - Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	LOS E	AM PM	**180.4** **162.9**	**F** **F**	**186.9** **175.2**	**F** **F**	**0.028** **0.044**	**4.5** **27.8**
18	Peter Coutts / Page Mill Rd	Santa Clara County	LOS E	AM PM	22.3 30.5	C+ C	22.9 30.8	C+ C	0.020 0.015	0.8 0.0
19	Hanover St / Page Mill Rd	Santa Clara County (SC CMP)	LOS E	AM PM	**85.6** 51.9	**F** D-	**92.1** 52.8	**F** D-	**0.025** 0.018	**11.2** 0.6
20	El Camino Real / Page Mill Rd – Oregon Expy	Santa Clara County (SC CMP)	LOS E	AM PM	75.1 **83.1**	E- **F**	**84.9** **90.2**	**F** **F**	**0.047** **0.035**	**13.2** **11.0**
21	Middlefield Rd / Oregon Expy	Santa Clara County (SC CMP)	LOS E	AM PM	**122.7** **101.5**	**F** **F**	**125.6** **103.6**	**F** **F**	**0.014** **0.012**	**4.7** **3.1**
22	Oregon Expy / West Bayshore Rd	Santa Clara County	LOS E	AM PM	23.4 20.8	C C+	23.4 21.0	C C+	0.003 0.008	0.0 0.1
23	I-280 SB Ramps / Alpine Rd*	San Mateo County	LOS E (warrant)	AM PM	42.0 16.7	E C	42.7 16.9	E C	N/A	N/A
24	I-280 NB Ramps / Alpine Rd*	San Mateo County	LOS E (warrant)	AM PM	26.7 29.1	D D	27.8 32.5	D D	N/A	N/A
25	Junipero Serra Blvd / Alpine Rd	Menlo Park	LOS D	AM PM	48.1 50.6	D D	51.6 52.8	D- D-	0.049 0.029	4.6 1.7
26	Junipero Serra Blvd / Campus Drive West	Santa Clara County	LOS E	AM PM	30.1 44.1	C D	32.5 50.3	C- D	0.009 0.043	1.5 8.6

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
27	Junipero Serra Blvd / Campus Drive East	Santa Clara County	LOS E	AM PM	14.0 17.8	B B	14.4 19.5	B B-	0.020 0.037	0.7 2.8
28	Junipero Serra Blvd / Stanford Ave	Santa Clara County	LOS E	AM PM	20.6 24.9	C+ C	22.4 29.9	C+ C	0.061 0.084	2.5 6.8
29	Foothill Expy / Hillview Ave	Santa Clara County	LOS E	AM PM	**124.6** 58.3	**F** E+	**135.0** 64.2	**F** E	**0.024** 0.015	**16.1** 9.0
30	Foothill Expy / Arastradero Rd	Santa Clara County (SC CMP)	LOS E	AM PM	**194.5** **202.5**	**F** **F**	**201.2** **208.9**	**F** **F**	**0.016** **0.095**	**10.4** **18.2**
31	Foothill Expy / San Antonio Rd	Santa Clara County (SC CMP)	LOS E	AM PM	38.8 **165.8**	D+ **F**	43.2 **171.0**	D **F**	0.016 **0.021**	6.7 **8.1**
32	Foothill Expy / El Monte Ave	Santa Clara County (SC CMP)	LOS E	AM PM	**142.6** **133.5**	**F** **F**	**149.3** **137.9**	**F** **F**	**0.014** **0.004**	**13.5** **1.9**
33	Foothill Expy / Springer Road-Magdalena Ave	Santa Clara County (SC CMP)	LOS E	AM PM	**128.7** **151.5**	**F** **F**	**131.9** **154.4**	**F** **F**	**0.014** **0.010**	**4.8** **5.1**
34	Bowdoin St / Stanford Ave*	Palo Alto	LOS E (warrant)	AM PM	16.7 25.8	C D	22.8 43.2	C E	N/A	N/A
35	Arboretum Rd / Quarry Rd	Palo Alto	LOS D	AM PM	46.8 43.3	D D	47.5 44.2	D D	0.040 0.039	1.3 1.8
36	Arboretum Rd / Palm Dr	Palo Alto	LOS D	AM PM	31.0 31.1	C C	32.4 32.5	C- C-	0.080 0.049	2.1 2.5
37	El Camino Real / Encinal Ave	Menlo Park	LOS D	AM PM	44.9 **89.9**	D **F**	45.4 **92.9**	D **F**	0.007 **0.015**	1.4 **5.5**
38	El Camino Real / Valparaiso Ave	Menlo Park	LOS D	AM PM	53.5 **56.0**	D- **E+**	54.0 **57.4**	D- **E+**	0.017 **0.015**	1.9 **2.7**
39	El Camino Real / Oak Grove Ave	Menlo Park	LOS D	AM PM	34.4 39.0	C- D+	34.1 38.9	C- D+	0.018 0.017	-0.2 0.0

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
40	El Camino Real / Santa Cruz Ave	Menlo Park	LOS D	AM PM	26.8 35.5	C D+	26.5 35.5	C D+	0.018 0.010	-0.1 0.0
41	El Camino Real / Ravenswood Rd	Menlo Park	LOS D	AM PM	48.0 **63.8**	D **E**	48.7 **65.8**	D **E**	0.008 **0.020**	1.0 **3.8**
42	El Camino Real / Roble Ave	Menlo Park	LOS D	AM PM	12.8 15.3	B B	12.7 15.2	B B	0.006 0.009	-0.1 -0.1
43	El Camino Real / Middle Ave	Menlo Park	LOS D	AM PM	25.1 28.5	C C	24.9 28.3	C C	0.014 0.009	-0.2 0.1
44	El Camino Real / Cambridge Ave	Menlo Park	LOS D	AM PM	15.2 24.8	B C	15.0 24.8	B C	0.014 0.009	-0.2 0.2
45	El Camino Real / Quarry Rd	Palo Alto	LOS D	AM PM	11.9 33.0	B+ C-	13.3 34.8	B C-	0.029 0.032	1.6 2.7
46	El Camino Real (SB) / University Ave	Palo Alto (SC CMP)	LOS E	AM PM	21.0 22.7	C+ C+	20.7 22.5	C+ C+	0.016 0.031	-0.1 0.0
47	El Camino Real (NB) / University Ave	Palo Alto (SC CMP)	LOS E	AM PM	27.3 25.2	C C	28.6 26.1	C C	0.008 0.016	0.5 0.7
48	El Camino Real / Embarcadero Rd	Palo Alto (SC CMP)	LOS E	AM PM	56.9 72.1	E+ E	60.4 **82.2**	E **F**	0.032 **0.059**	5.2 **20.0**
49	El Camino Real / Churchill Ave	Palo Alto	LOS D	AM PM	25.4 26.7	C C	25.4 26.6	C C	0.017 0.018	0.1 0.1
50	El Camino Real / Serra St	Palo Alto	LOS D	AM PM	24.6 29.3	C C	28.3 36.1	C D+	0.082 0.111	6.1 10.7
51	El Camino Real / Stanford Ave	Palo Alto	LOS D	AM PM	31.1 32.2	C C-	31.7 34.7	C C-	0.033 0.054	1.0 3.9
52	El Camino Real / California Ave	Palo Alto	LOS D	AM PM	22.8 27.8	C+ C	22.1 27.5	C+ C	0.029 0.031	-0.4 0.0

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
53	El Camino Real / Arastradero Rd - Charleston Rd	Palo Alto (SC CMP)	LOS E	AM PM	67.1 68.7	E E	70.2 70.3	E E	0.020 0.019	5.5 3.8
54	El Camino Real / San Antonio Rd	Mountain View (SC CMP)	LOS E	AM PM	60.8 55.6	E E+	61.3 55.7	E E+	0.008 0.007	0.8 0.0
55	Alma St / Lytton Ave	Palo Alto	LOS D	AM PM	28.2 25.9	C C	30.9 27.1	C C	0.017 0.015	4.1 1.9
56	Alma St / Hamilton Ave	Palo Alto	LOS D	AM PM	10.2 **57.7**	B+ **E+**	10.4 **60.0**	B+ **E**	0.007 **0.012**	0.3 **5.0**
57	Alma St / Churchill Ave	Palo Alto	LOS D	AM PM	32.4 **59.2**	C- **E+**	32.5 **59.8**	C- **E+**	0.005 **0.006**	0.2 **1.0**
58	Alma St / Charleston Rd	Palo Alto	LOS D	AM PM	**123.4** **121.5**	**F** **F**	**127.3** **126.7**	**F** **F**	**0.009** **0.017**	**3.9** **6.6**
59	Middlefield Rd / Marsh Rd	Atherton	LOS D	AM PM	**76.9** **76.0**	**E-** **E-**	**79.7** **77.4**	**E-** **E-**	**0.012** **0.000**	**4.6** **0.0**
60	Middlefield Rd / Ravenswood Ave	Menlo Park	LOS D	AM PM	49.3 45.3	D D	51.0 46.7	D D	0.011 0.012	2.1 1.9
61	Middlefield Rd / Ringwood Ave	Menlo Park	LOS D	AM PM	43.2 52.6	D D-	43.4 52.9	D D-	0.004 0.006	0.2 0.4
62	Middlefield Rd / Willow Rd	Menlo Park	LOS D	AM PM	50.0 53.0	D D-	50.2 53.4	D D-	0.000 0.006	0.0 0.5
63	Middlefield Rd / Lytton Ave	Palo Alto	LOS D	AM PM	49.2 **66.1**	D **E**	51.1 **70.1**	D- **E**	0.018 **0.017**	2.1 **4.4**
64	Middlefield Rd / University Ave	Palo Alto	LOS D	AM PM	35.1 39.4	D+ D	35.6 40.8	D+ D	0.019 0.031	0.5 2.0
65	Middlefield Rd / Hamilton Ave	Palo Alto	LOS D	AM PM	10.5 10.8	B+ B+	10.6 10.9	B+ B+	0.005 0.007	0.1 0.1

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
66	Middlefield Rd / Embarcadero Rd	Palo Alto	LOS D	AM PM	55.0 **68.1**	D- **E**	**59.4** **72.9**	**E+** **E**	**0.030** **0.025**	**5.8** **6.4**
67	Saint Francis Dr / Embarcadero Rd	Palo Alto	LOS D	AM PM	23.0 19.3	C+ B-	23.0 19.1	C+ B-	0.015 0.014	0.2 -0.1
68	E. Bayshore Rd / Embarcadero Rd	Palo Alto	LOS D	AM PM	**98.5** **77.7**	**F** **E-**	**99.0** **78.7**	**F** **E-**	**0.006** **0.004**	**0.5** **0.9**
69	Middlefield Rd / Charleston Rd	Palo Alto	LOS D	AM PM	**58.0** **67.7**	**E+** **E**	**58.3** **68.5**	**E+** **E**	**0.004** **0.007**	**0.4** **1.6**
70	US 101 SB Ramps / Marsh Rd	Menlo Park	LOS D	AM PM	**77.3** **78.0**	**E-** **E-**	**77.2** **77.9**	**E-** **E-**	**0.000** **0.000**	**0.0** **0.0**
71	US 101 NB Ramps / Marsh Rd	Menlo Park	LOS D	AM PM	23.2 41.1	C D	23.2 41.1	C D	0.000 0.000	0.0 0.0
72	Bay Rd / Willow Rd	Menlo Park	LOS D	AM PM	19.7 11.3	B- B+	19.7 11.3	B- B+	0.008 0.006	0.1 0.1
73	Newbridge St / Willow Rd	Menlo Park	LOS D	AM PM	42.7 53.6	D D-	42.7 53.9	D D-	0.005 0.004	0.1 0.6
74	O'Brien Dr / Willow Rd	Menlo Park	LOS D	AM PM	19.4 20.1	B- C+	19.4 20.0	B- C+	0.003 0.004	0.0 0.0
75	Hamilton Ave / Willow Rd	Menlo Park	LOS D	AM PM	41.3 40.9	D D	42.0 41.1	D D	0.005 0.004	1.2 0.3
76	Bayfront Expy / Willow Rd	Menlo Park (SM CMP)	LOS F	AM PM	51.1 64.9	D- E	51.1 65.3	D- E	0.000 0.004	0.0 0.6
77	Woodland Ave / University Ave	East Palo Alto	LOS D	AM PM	**71.7** **66.1**	**E** **E**	**72.7** **66.4**	**E** **E**	**0.000** **0.006**	**0.0** **0.9**
78	US 101 SB Ramps / University Ave	East Palo Alto	LOS D	AM PM	27.9 25.8	C C	28.0 25.8	C C	0.004 0.006	0.2 0.1

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[1a]	LOS Threshold[2] [b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
79	Donohoe St / University Ave	East Palo Alto	LOS D	AM PM	**76.3** 43.4	**E-** D	**77.1** 43.5	**E-** D	**0.005** 0.004	**1.3** 0.1
80	University Ave / Bay Rd	East Palo Alto	LOS D	AM PM	54.1 51.8	D- D-	54.4 52.4	D- D-	0.005 0.009	0.5 1.1
81	University Ave / Bayfront Expy	Menlo Park (SM CMP)	LOS F	AM PM	26.4 137.3	C F	26.6 140.0	C F	0.008 0.007	0.5 3.3
82	Town & Country Driveway / Embarcadero Rd	Palo Alto	LOS D	AM PM	27.8 28.3	C C	27.2 27.9	C C	0.031 0.021	-0.4 -0.3
83	Charleston Rd / San Antonio Rd	Palo Alto~~Mountain View~~ (SC CMP)	LOS E	AM PM	79.2 68.3	E- E	79.4 68.6	E- E	0.001 0.002	0.4 0.5
84	US 101 SB Ramps / Willow Rd	Menlo Park	LOS D	AM PM	11.1 12.8	B+ B	11.2 12.8	B+ B	0.003 0.000	0.2 0.0
85	US 101 NB Ramps / Willow Rd	Menlo Park	LOS D	AM PM	25.0 24.2	C C	25.1 24.2	C C	0.000 0.003	0.0 0.1
86	Central Expy / Rengstorff Ave	Santa Clara County (SC CMP)	LOS E	AM PM	**447.1** **248.1**	**F** **F**	**449.7** **250.5**	**F** **F**	**0.010** **0.008**	**2.2** **2.6**
87	Central Expy / Shoreline Blvd (N)	Santa Clara County (SC CMP)	LOS E	AM PM	**224.5** **97.4**	**F** **F**	**223.6** **97.1**	**F** **F**	**0.004** **0.006**	**0.2** **-0.1**
88	Central Expy / Shoreline Blvd (S)	Santa Clara County (SC CMP)	LOS E	AM PM	11.2 7.5	B+ A	11.2 7.5	B+ A	0.003 0.005	-0.1 0.0
89	Central Expy / Castro St-Moffett Blvd	Santa Clara County (SC CMP)	LOS E	AM PM	**240.1** **222.1**	**F** **F**	**243.7** **225.7**	**F** **F**	**0.010** **0.009**	**5.2** **4.5**
90	Foothill Expy / Edith Ave	Santa Clara County	LOS E	AM PM	55.9 **105.5**	E+ **F**	61.5 **112.6**	E **F**	0.016 **0.015**	10.2 **11.8**
91	Foothill Expy / Main St	Santa Clara County (SC CMP)	LOS E	AM PM	44.6 54.8	D D-	49.9 55.8	D E+	0.016 0.009	8.5 -1.3

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	Cumulative (2035) No Project		Cumulative (2035) With Project			
					Delay[d]	LOS[e]	Delay[a]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
92	University Ave / O'Brien Dr	Menlo Park	LOS D	AM PM	9.1 13.4	A B	9.1 13.3	A B	0.005 0.006	0.0 0.0
93	University Ave / Adams Dr*	Menlo Park	LOS E (warrant)	AM PM	425.5 39.6	F[h] E	456.2 41.4	F[h] E	N/A	N/A
94	University Ave / Runnymede St	East Palo Alto	LOS D	AM PM	15.3 19.1	B B-	15.3 19.1	B B-	0.005 0.005	0.0 0.0
95	University Avenue / Bell Street	East Palo Alto	LOS D	AM PM	14.8 17.3	B B	14.7 17.2	B B	0.005 0.005	0.0 0.0

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.
In some cases, intersections may show a reduction in average delay with the addition of Project traffic, which is counter-intuitive. However, average delay values are weighted averages, which will decrease when traffic is added to a vehicle movement that operates with low delay. Conversely, relatively small volume increases to movements with high delays can substantially increase the weighted average delay.

* Indicates unsignalized intersection.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County; "(SM CMP)" indicates CMP intersection in San Mateo County

[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.

[c] AM = morning peak traffic hour, PM = evening peak traffic hour.

[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.

[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.

[f] Change ("Δ") in critical volume-to-capacity ratio (V/C) between Cumulative (2035) and Cumulative (2035) With Project Conditions. This ratio is not applicable for side-street stop controlled intersections and is denoted by "N/A".

[g] Change ("Δ") in average critical movement delay between Cumulative (2035) and Cumulative (2035) With Project Conditions. This ratio is not applicable for side-street stop controlled intersections and is denoted by "N/A".

[h] A signal warrant is not met for this intersection.

SOURCE: Fehr & Peers, September 2018.

TABLE 5.15-29
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
1	I-280 NB On-Ramp / Sand Hill Road	Menlo Park	LOS D	AM PM	10.3 12.6	B+ B	10.1 13.7	B+ B	0.015 0.032	-0.2 1.2
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**136.9** 18.4	**F** B-	**155.2** 18.6	**F** B-	**0.038** 0.021	**19.2** 0.2
3	Addison-Wesley / Sand Hill Rd	Menlo Park	LOS D	AM PM	37.9 21.5	D+ C+	49.6 22.3	D C+	0.037 0.032	18.3 1.4
4	Saga Ln / Sand Hill Rd	Menlo Park	LOS D	AM PM	19.4 30.1	B- C	19.6 29.8	B- C	0.036 0.032	0.5 -0.2
5	Sharon Park Dr / Sand Hill Rd	Menlo Park	LOS D	AM PM	17.4 18.9	B B-	17.4 18.6	B B-	0.036 0.032	0.3 0.0
6	Alameda de las Pulgas / Santa Cruz Ave	San Mateo County	LOS D	AM PM	13.3 14.6	B B	13.3 14.5	B B	0.000 0.000	0.0 0.0
7	Santa Cruz Ave / Sand Hill Rd	Menlo Park	LOS D	AM PM	50.6 45.9	D D	52.1 46.9	D- D	0.030 0.038	2.0 1.7
8	Oak Ave / Sand Hill Rd	Menlo Park	LOS D	AM PM	10.5 3.9	B+ A	10.5 3.9	B+ A	0.025 0.024	0.1 0.1
9	Stock Farm Rd / Sand Hill Rd	Palo Alto	LOS D	AM PM	24.3 29.4	C C	25.4 30.3	C C	0.028 0.022	1.7 0.9
10	Pasteur Dr / Sand Hill Rd	Palo Alto	LOS D	AM PM	20.8 26.9	C+ C	20.8 27.7	C+ C	0.009 0.021	0.4 1.4
11	Arboretum Rd / Sand Hill Rd	Palo Alto	LOS D	AM PM	25.2 31.6	C C	25.9 32.3	C C-	0.013 0.012	1.2 0.9
12	El Camino Real / Sand Hill Rd	Palo Alto (SC CMP)	LOS E	AM PM	43.7 39.8	D D	43.6 40.3	D D	0.016 0.013	-3.1 0.6
13	I-280 SB Ramps / Page Mill Road	Santa Clara County	LOS E	AM PM	32.5 47.1	C- D	32.7 47.8	C- D	0.002 0.005	0.1 0.2

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
14	I-280 NB Ramps / Page Mill Road	Santa Clara County	LOS E	AM PM	9.3 11.7	A B+	9.3 12.2	A B	0.004 0.007	0.1 1.8
15	Deer Creek Road / Page Mill Road	Santa Clara County	LOS E	AM PM	15.9 13.8	B B	16.6 13.9	B B	0.021 0.016	1.2 -0.3
16	Coyote Hill Road / Page Mill Road	Santa Clara County	LOS E	AM PM	8.0 8.7	A A	8.5 9.0	A A	0.011 0.016	0.0 -0.2
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**163.6** **152.6**	**F** **F**	**169.5** **166.9**	**F** **F**	**0.026** **0.063**	**4.2** **20.3**
18	Peter Coutts Road / Page Mill Road	Santa Clara County	LOS E	AM PM	22.7 30.6	C+ C	23.3 30.9	C C	0.020 0.015	0.9 0.0
19	Hanover Street / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**90.7** 52.7	**F** D-	**97.6** 53.8	**F** D-	**0.025** 0.018	**11.6** 0.7
20	El Camino Real / Page Mill Road – Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	76.4 **83.1**	E- **F**	**86.3** **90.7**	**F** **F**	**0.047** **0.035**	**13.4** **10.8**
21	Middlefield Road / Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	**122.6** **101.6**	**F** **F**	**125.3** **103.7**	**F** **F**	**0.014** 0.012	**4.4** 3.1
22	Oregon Expressway / West Bayshore Rd	Santa Clara County	LOS E	AM PM	23.6 20.9	C C+	23.6 21.0	C C+	0.003 0.008	0.0 0.1
23	I-280 SB Ramps / Alpine Road *	San Mateo County	LOS E (Warrant)	AM PM	42.0 16.7	E C	42.7 16.9	E C	N/A	N/A
24	I-280 NB Ramps / Alpine Road *	San Mateo County	LOS E (Warrant)	AM PM	26.3 26.7	D D	27.4 29.7	D D	N/A	N/A
25	Junipero Serra Blvd / Alpine Road	Menlo Park	LOS D	AM PM	47.8 50.4	D D	50.7 52.6	D D-	0.049 0.029	4.3 1.6
26	Junipero Serra Blvd / Campus Drive West	Santa Clara County	LOS E	AM PM	29.9 43.7	C D	32.2 49.9	C- D	0.009 0.043	1.4 8.2

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
27	Junipero Serra Blvd / Campus Drive East	Santa Clara County	LOS E	AM PM	14.0 18.1	B B-	14.3 19.7	B B-	0.020 0.037	0.7 2.7
28	Junipero Serra Blvd / Stanford Avenue	Santa Clara County	LOS E	AM PM	20.6 25.9	C+ C	22.4 31.3	C+ C	0.061 0.084	2.5 7.3
29	Foothill Expressway / Hillview Avenue	Santa Clara County	LOS E	AM PM	**121.1** 48.2	**F** D	**131.6** 52.4	**F** D-	**0.024** 0.015	**16.1** 6.7
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**293.4** **211.5**	**F** **F**	**298.6** **217.3**	**F** **F**	**0.016** **0.013**	**7.8** **-2.0**
31	Foothill Expressway / San Antonio Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	36.0 **156.3**	D+ **F**	40.1 **161.2**	D- **F**	0.016 **0.021**	6.1 **7.6**
32	Foothill Expressway / El Monte Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**142.1** **123.9**	**F** **F**	**148.9** **128.4**	**F** **F**	**0.014** 0.004	**13.5** 1.8
33	Foothill Expressway / Springer Road – Magdalena Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**128.7** **148.3**	**F** **F**	**131.9** **151.1**	**F** **F**	**0.014** **0.010**	**4.8** **5.1**
34	Bowdoin Street / Stanford Avenue *	Palo Alto	LOS E (Warrant)	AM PM	16.7 25.8	C D	22.8 43.2	C E	N/A	N/A
35	Arboretum Road / Quarry Road	Palo Alto	LOS D	AM PM	46.8 43.3	D D	47.5 44.2	D D	0.040 0.039	1.3 1.8
36	Arboretum Road / Palm Drive	Palo Alto	LOS D	AM PM	31.0 31.1	C C	32.4 32.5	C C	0.080 0.049	2.1 2.5
37	El Camino Real / Encinal Ave	Menlo Park	LOS D	AM PM	44.9 **89.9**	D **F**	45.4 **92.9**	D **F**	0.007 **0.015**	1.4 **5.5**
38	El Camino Real / Valparaiso Ave	Menlo Park	LOS D	AM PM	53.5 **56.0**	D- **E+**	54.0 **57.4**	D- **E+**	0.017 **0.015**	1.9 **2.7**
39	El Camino Real / Oak Grove Ave	Menlo Park	LOS D	AM PM	34.4 39.0	C- D+	34.1 38.9	C- D+	0.018 0.017	-0.2 0.0

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
40	El Camino Real / Santa Cruz Avenue	Menlo Park	LOS D	AM PM	26.8 35.5	C D+	26.5 35.5	C D+	0.018 0.010	-0.1 0.0
41	El Camino Real / Ravenswood Road	Menlo Park	LOS D	AM PM	48.0 **63.8**	D **E**	48.7 **65.8**	D **F**	0.008 **0.020**	1.0 **3.8**
42	El Camino Real / Roble Avenue	Menlo Park	LOS D	AM PM	12.8 15.3	B B	12.7 15.2	B B	0.006 0.009	-0.1 -0.1
43	El Camino Real / Middle Avenue	Menlo Park	LOS D	AM PM	25.1 28.5	C C	24.9 28.3	C C	0.014 0.009	-0.2 0.1
44	El Camino Real / Cambridge Avenue	Menlo Park	LOS D	AM PM	15.2 24.8	B C	15.0 24.8	B C	0.014 0.009	-0.2 0.2
45	El Camino Real / Quarry Road	Palo Alto	LOS D	AM PM	12.0 33.0	B+ C-	13.3 34.8	B C-	0.029 0.032	1.6 2.7
46	El Camino Real (SB) / University Avenue	Palo Alto (SC CMP)	LOS E	AM PM	21.0 22.7	C+ C+	20.7 22.5	C+ C+	0.016 0.031	-0.1 0.0
47	El Camino Real (NB) / University Avenue	Palo Alto (SC CMP)	LOS E	AM PM	27.3 25.2	C C	28.6 26.1	C C	0.008 0.016	0.5 0.7
48	El Camino Real / Embarcadero Road	Palo Alto (SC CMP)	LOS E	AM PM	56.9 72.1	E+ E	60.4 **82.2**	E **F**	0.032 **0.059**	5.2 **20.0**
49	El Camino Real / Churchill Avenue	Palo Alto	LOS D	AM PM	25.4 27.1	C C	25.3 27.1	C C	0.017 0.018	0.1 0.1
50	El Camino Real / Serra Street	Palo Alto	LOS D	AM PM	25.2 29.0	C C	28.8 35.8	C D+	0.082 0.111	6.0 10.8
51	El Camino Real / Stanford Ave	Palo Alto	LOS D	AM PM	31.0 32.3	C C-	31.7 34.8	C C-	0.033 0.054	1.0 4.0
52	El Camino Real / California Ave	Palo Alto	LOS D	AM PM	22.7 27.7	C+ C	22.1 27.5	C+ C	0.029 0.031	-0.4 0.0

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
53	El Camino Real / Arastradero Road - Charleston Road	Palo Alto (SC CMP)	LOS E	AM PM	68.5 71.6	E E	71.7 74.0	E E	0.020 0.010	5.5 2.0
54	El Camino Real / San Antonio Road	Mountain View (SC CMP)	LOS E	AM PM	60.9 55.7	E E+	61.4 55.8	E E+	0.008 0.005	0.8 0.1
55	Alma Street / Lytton Avenue	Palo Alto	LOS D	AM PM	28.2 25.9	C C	30.9 27.1	C C	0.017 0.015	4.1 1.9
56	Alma Street / Hamilton Avenue	Palo Alto	LOS D	AM PM	10.2 **57.7**	B+ **E+**	10.4 **60.0**	B+ **E**	0.007 **0.012**	0.3 **5.0**
57	Alma Street / Churchill Avenue	Palo Alto	LOS D	AM PM	32.4 **59.2**	C- **E+**	32.5 59.8	C- E+	0.005 0.005	0.2 1.0
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	123.7 117.4	**F** **F**	127.5 **122.5**	**F** **F**	0.009 **0.017**	3.9 **6.6**
59	Middlefield Road / Marsh Road	Atherton	LOS D	AM PM	**76.9** **76.0**	**E-** **E-**	**79.7** **77.4**	**E-** E	**0.012** 0.000	**4.6** 0.0
60	Middlefield Road / Ravenswood Avenue	Menlo Park	LOS D	AM PM	49.3 45.3	D D	51.0 46.7	D D	0.011 0.012	2.1 1.9
61	Middlefield Road / Ringwood Avenue	Menlo Park	LOS D	AM PM	43.2 52.6	D D-	43.4 52.9	D D-	0.004 0.006	0.2 0.4
62	Middlefield Road / Willow Road	Menlo Park	LOS D	AM PM	50.0 53.0	D D-	50.2 53.4	D D-	0.000 0.006	0.0 0.5
63	Middlefield Road / Lytton Avenue	Palo Alto	LOS D	AM PM	49.2 **66.1**	D **E**	51.1 **70.1**	D- **E**	0.018 **0.017**	2.1 **4.4**
64	Middlefield Road / University Avenue	Palo Alto	LOS D	AM PM	35.1 39.4	D+ D	35.6 40.8	D+ D	0.019 0.031	0.5 2.0
65	Middlefield Road / Hamilton Avenue	Palo Alto	LOS D	AM PM	10.5 10.8	B+ B+	10.6 10.9	B+ B+	0.005 0.007	0.1 0.1

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
66	Middlefield Road / Embarcadero Road	Palo Alto	LOS D	AM PM	55.0 **68.1**	D- **E**	**59.4** **72.9**	**E+** **E**	0.030 **0.025**	5.8 **6.4**
67	St. Francis Drive / Embarcadero Road	Palo Alto	LOS D	AM PM	23.0 19.3	C+ B-	23.0 19.1	C+ B-	0.015 0.014	0.2 -0.1
68	E. Bayshore Road / Embarcadero Road	Palo Alto	LOS D	AM PM	**98.5** **77.7**	**F** **E**	**99.0** **78.7**	**F** **E**	0.006 0.004	0.5 0.9
69	Middlefield Road / Charleston Road	Palo Alto	LOS D	AM PM	**56.9** **66.5**	**E+** **E**	**57.2** **67.2**	**E+** **E**	0.004 0.007	0.3 1.4
70	US 101 SB Ramps / Marsh Road	Menlo Park	LOS D	AM PM	**77.3** **78.0**	**E** **E**	**77.2** **77.9**	**E** **E**	0.000 0.000	0.0 0.0
71	US 101 NB Ramps / Marsh Road	Menlo Park	LOS D	AM PM	23.2 41.1	C D	23.2 41.1	C D	0.000 0.000	0.0 0.0
72	Bay Road / Willow Road	Menlo Park	LOS D	AM PM	19.7 11.3	B- B+	19.7 11.3	B- B+	0.008 0.006	0.1 0.1
73	Newbridge Street / Willow Road	Menlo Park	LOS D	AM PM	42.7 53.6	D D-	42.7 53.9	D D-	0.005 0.004	0.1 0.6
74	O'Brien Drive / Willow Road	Menlo Park	LOS D	AM PM	19.4 20.1	B- C+	1934 20.0	B- C+	0.003 0.004	0.0 0.0
75	Hamilton Avenue / Willow Road	Menlo Park	LOS D	AM PM	41.3 40.9	D D	42.0 41.1	D D	0.005 0.004	1.2 0.3
76	Bayfront Expy / Willow Road	Menlo Park (SM CMP)	LOS F	AM PM	51.1 64.9	D- E	51.1 65.3	D- E	0.000 0.004	0.0 0.6
77	Woodland Avenue / University Avenue	East Palo Alto	LOS D	AM PM	**71.7** **66.1**	**E** **E**	**72.7** **66.4**	**E** **E**	0.000 0.006	0.0 0.9
78	US 101 SB Ramps / University Avenue	East Palo Alto	LOS D	AM PM	27.9 25.8	C C	28.0 25.8	C C	0.004 0.006	0.2 0.1

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
79	Donohoe Street / University Avenue	East Palo Alto	LOS D	AM PM	**76.3** 43.4	**E** D	**77.1** 43.5	**E** D	0.005 0.004	1.3 0.1
80	University Avenue / Bay Road	East Palo Alto	LOS D	AM PM	54.1 51.8	D D	54.4 52.4	D D	0.005 0.009	0.5 1.1
81	University Avenue / Bayfront Expressway	Menlo Park (SM CMP)	LOS F	AM PM	26.4 137.3	C F	26.6 140.0	C F	0.008 0.007	0.5 3.3
82	Town & Country Driveway / Embarcadero Road	Palo Alto	LOS D	AM PM	27.8 28.3	C C	27.2 27.9	C C	0.031 0.021	-0.4 -0.3
83	Charleston Road / San Antonio Road	Mountain View (SC CMP)	LOS E	AM PM	79.2 66.8	E E	79.4 67.0	E E	0.001 0.002	0.4 0.5
84	US 101 SB Ramps / Willow Road	Menlo Park	LOS D	AM PM	11.1 12.8	B+ B	11.2 12.8	B+ B	0.003 0.000	0.2 0.0
85	US 101 NB Ramps / Willow Road	Menlo Park	LOS D	AM PM	25.0 24.2	C C	25.1 24.2	C C	0.000 0.003	0.0 0.1
86	Central Expressway / Rengstorff Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**449.7** **247.6**	**F** **F**	**452.3** **250.0**	**F** **F**	0.010 0.008	2.3 2.5
87	Central Expressway / Shoreline Blvd (N)	Santa Clara Co. (SC CMP)	LOS E	AM PM	**227.3** **97.6**	**F** **F**	**226.4** **97.4**	**F** **F**	0.004 0.006	0.2 -0.1
88	Central Expressway / Shoreline Blvd (S)	Santa Clara Co. (SC CMP)	LOS E	AM PM	11.2 7.5	B+ A	11.2 7.5	B+ A	0.003 0.005	-0.1 0.0
89	Central Expressway / Moffett Boulevard	Santa Clara Co. (SC CMP)	LOS E	AM PM	**241.9** **221.4**	**F** **F**	**245.4** **225.0**	**F** F	**0.010** 0.009	**5.2** 4.5
90	Foothill Expressway / Edith Avenue	Santa Clara County	LOS E	AM PM	52.2 **92.8**	D **F**	57.5 **99.7**	E+ **F**	0.016 **0.015**	9.6 **11.6**
91	Foothill Expressway / Main Street	Santa Clara Co. (SC CMP)	LOS E	AM PM	41.1 53.8	D D	46.0 54.2	D D	0.016 0.009	7.7 1.3

TABLE 5.15-29 (CONTINUED)
2035 INTERSECTION LEVELS OF SERVICE
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project			
					Delay[d]	LOS[e]	Delay[d]	LOS[e]	Δ in Crit. V/C[f]	Δ in Crit. Delay[g]
92	University Avenue / O'Brien Drive	Menlo Park	LOS D	AM PM	9.1 13.4	A B	9.1 13.3	A B	0.005 0.006	0.0 0.0
93	University Avenue / Adams Drive *	Menlo Park	LOS E (warrant)	AM PM	**425.5** 39.6	**F**[h] E	**456.2** 41.4	**F**[h] E	N/A	N/A
94	University Avenue / Runnymede Street	East Palo Alto	LOS D	AM PM	15.3 19.1	B B-	15.3 19.1	B B-	0.005 0.005	0.0 0.0
95	University Avenue / Bell Street	East Palo Alto	LOS D	AM PM	14.8 17.3	B B	14.7 17.2	B B	0.005 0.005	0.0 -0.1

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.
In some cases, intersections may show a reduction in average delay with the addition of Project traffic, which is counter-intuitive. However, average delay values are weighted averages, which will decrease when traffic is added to a vehicle movement that operates with low delay. Conversely, relatively small volume increases to movements with high delays can substantially increase the weighted average delay.

* Indicates unsignalized intersection.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County; "(SM CMP)" indicates CMP intersection in San Mateo County

[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.

[c] AM = morning peak traffic hour, PM = evening peak traffic hour.

[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.

[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.

[f] Change ("Δ") in critical volume-to-capacity ratio (V/C) between Cumulative (2035) and Cumulative (2035) With Project Conditions. This ratio is not applicable for side-street stop controlled intersections and is denoted by "N/A".

[g] Change ("Δ") in average critical movement delay between Cumulative (2035) and Cumulative (2035) With Project Conditions. This ratio is not applicable for side-street stop controlled intersections and is denoted by "N/A".

[h] A signal warrant is not met for this intersection.

SOURCE: Fehr & Peers, August 2017.

Draft EIR Section 5.15 Transportation and Traffic, pages 5.15-124 to 5.15-125, the entire bullet describing the mitigation for intersection #17 under Cumulative (2035) With Project conditions has been revised to reflect the previously described changes made to VTA's 2040 traffic model regarding Page Mill Road lane configuration, as follows:

- **Intersection #17: Implement the same mitigation identified for this intersection under 2018 Baseline with Project conditions, which stipulates contribution of fair-share funding to the installation of an overlap signal phase for northbound and southbound right-turning vehicles at the signalized intersection of Junipero Serra Boulevard – Foothill Expressway / Page Mill Road; ~~and~~ widening of southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane; and addition of a third westbound through lane and associated receiving lane and installation of a westbound right turn overlap phase.**

  Installation of an overlap phase for northbound, ~~and~~ southbound and westbound right-turning vehicles would be accommodated through the modification of the existing traffic signal. Widening southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road likely would require the acquisition of additional right-of-way. This improvement would allow southbound right-turning vehicles additional queuing space so that southbound through vehicles do not block the right-turn lane. The new westbound through lane and receiving lane would require some right-of-way from the subdivision corner (northeast corner) and along the dish parcel for the receiving lane (northwest corner).

  Implementation of this mitigation measure would reduce the impact to a less-than-significant level. However, because this improvement may require additional funding that has not yet been identified, it is not certain that this improvement would be implemented in a timely manner such that the contribution of the proposed Project to the cumulative impact is reduced to less than considerable. Therefore, the impact would remain significant and unavoidable.

  ***Impacts of Mitigation*:** The mitigation would not have a substantial adverse effect on bicycle and pedestrian StreetScore+ QOS, as they would remain unchanged at QOS 3.5 and QOS 4, respectively. With the proposed mitigation, a second lane would be added traveling southbound between Stanford Avenue and Page Mill Road, aligning with the existing designated southbound right-turn lane at Page Mill Road, and would not impact the existing intersection configuration of the southbound approach. A third through lane would be added to the westbound approach and continued on the westbound receiving lanes, requiring additional right-of-way, and increasing the pedestrian crossing distance on the east and west legs of the intersection. In addition, the north/south bicycle crossing distances would increase slightly due to the additional through lane while maintaining but not exacerbating the current uncomfortable conditions for bicyclists and pedestrians at the intersection. ~~The proposed mitigation would not alter the existing intersection configuration (only lengthening the existing right-turn lane). The pedestrian crossing distances would remain unchanged.~~

  It is noted that there are improvements identified for this intersection in the draft *Santa Clara County Expressway Plan 2040*. The first improvement, which is a Tier 1 (highest

priority) improvement, would widen Page Mill Road from just east of Junipero Serra Boulevard-Foothill Expressway to the I-280 ramps. This improvement is fully funded through Measure B but conservatively is not ~~and is~~ anticipated to be in place by 2035.

The second improvement, which is a Tier 3 (lowest priority) improvement, is to eliminate the intersection by grade-separating Page Mill Road above Junipero Serra Boulevard – Foothill Expressway. The grade separation improvements were not identified as a mitigation for the proposed 2018 General Use Permit project because the mitigation measure for Intersection #17 which is a smaller project and would have fewer secondary environmental effects, mitigates the proposed Project's contribution to the cumulative impact to a less-than-considerable level by 2035. In addition, the grade separation project has not completed CEQA review, may not be approved, and may not receive funding.

As explained previously, the Draft EIR identified a significant impact under the 2018 Baseline with Project Conditions at Intersection #31. However, that result was due to a volume error that has since been corrected. After correction to the PM peak hour traffic volume in the 2018 Baseline, Intersection #31 (Foothill Expressway/San Antonio Road) is no longer significantly impacted in the Baseline (2018) With Project Conditions. Accordingly, Draft EIR, Section 5.15 Transportation and Traffic page 5.15-127, second paragraph, the impact description for the 2035 Cumulative with Project condition is revised to omit reference to mitigation under the 2018 Baseline with Project conditions, because the impact would not occur under 2018 Baseline with Project conditions:

- **Intersection #31: ~~Implement the same mitigation identified for this intersection under 2018 Baseline with Project Conditions, which stipulates contribution of~~ Contribute fair-share funding to the addition of a third southbound through lane on Foothill Expressway between San Antonio Road and El Monte Avenue.**

Draft EIR Section 5.15 Transportation and Traffic page 5.15-129, first paragraph, the mitigation discussion for Intersection #37 been amended in response to Comment A-MP-32 as follows:

***Impacts of Mitigation*:** The mitigation would not have a substantial adverse effect on bicycle and pedestrian StreetScore+ QOS, as they would remain unchanged at QOS 2.8 and QOS 2.7, respectively. The proposed mitigation would not alter the existing pedestrian crossing distances on all approaches. While the bicycle StreetScore+ QOS on the northbound approach would not improve, bicyclists would no longer move left across the right-turn conflict area, and instances of Right Turn On Red would be reduced because vehicles would no longer have a designated ~~dedicated~~ right-turn lane. The San Mateo *County Comprehensive Bicycle and Pedestrian Plan* (2011) proposes Class II bike lanes on El Camino Real between Valparaiso Avenue and Alejandra Avenue, and the City of Menlo Park's *El Camino Real Corridor Study* (approved May 2016) proposes buffered Class II facilities (bicycle lanes) between Encinal Avenue and Middle Avenue as part of the preferred alternative (Alternative 2). At Valparaiso Avenue, the northbound right-turn lane would allow for the conversion of a through/right-turn lane while maintaining the City's goal to provide bicycle lanes up to the Encinal Avenue intersection. ~~*Comprehensive Bicycle Development Plan* (2005) proposed Class III bike routes on El Camino Real at Encinal Avenue.~~ The proposed mitigation measure could conflict with a Class II facility ~~bicycle lane~~ if only on-street parking is removed in order

to add a third through lane. However, if the center median were narrowed, space for a bicycle lane could be provided. ~~The proposed mitigation measure would not conflict with a Class III bikeway. In addition, t~~The existing bus stop on the northeast corner on El Camino Real may block through traffic when boarding and alighting passengers if the proposed mitigation measure is constructed. However, ~~but~~ this is typical for bus stops on El Camino Real and other major arterials.

Draft EIR Section 5.15 Transportation and Traffic page 5.15-130, fourth paragraph, the mitigation discussion for Intersection #38 been amended as follows in response to Comment A-MP-32:

***Impacts of Mitigation*:** The mitigation would not have a substantial adverse effect on bicycle and pedestrian StreetScore+ QOS, as they would remain unchanged at QOS 3.3 and QOS 4, respectively. The proposed mitigation would not alter the existing pedestrian crossing distances. While the bicycle StreetScore+ QOS on the northbound approach would not improve, bicyclists would no longer move left across the right-turn conflict area, and instances of Right Turn On Red would be reduced because vehicles would no longer have a ~~dedicated~~ designated right-turn lane. The San Mateo *County Comprehensive Bicycle and Pedestrian Plan* (2011) ~~and the City of Menlo Park *Comprehensive Bicycle Development Plan* (2005) proposed Class III bike routes on El Camino Real at Valparaiso Avenue. The proposed mitigation measure would not conflict with a Class III bikeway.~~ proposes Class II bike lanes on El Camino Real between Valparaiso Avenue and Alejandra Avenue, and the City of Menlo Park's *El Camino Real Corridor Study* (approved May 2016) proposes buffered Class II facilities (bicycle lanes) between Encinal Avenue and Middle Avenue as part of the preferred alternative (Alternative 2). The proposed mitigation can be provided without precluding bicycle lanes on El Camino Real by using the center-median space on the north side of the intersection and modifying the buffered bicycle lane to a standard, non-buffered bike lane (Class II). On the south side of the intersection, the City's proposed design concept can be preserved by using the center-median space and modifying the shared right-turn/Class III facility to a shared through/right-turn lane and Class II facility to the right.

Draft EIR Section 5.15 Transportation and Traffic page 5.15-130, last paragraph, the mitigation discussion for Intersection #41 been amended as follows in response to Comment A-MP-32:

***Impacts of Mitigation*:** The mitigation would not have a substantial adverse effect on bicycle and pedestrian StreetScore+ QOS, as they would remain unchanged at QOS 3.5 (for both). The proposed mitigation would not alter the existing pedestrian crossing distances. While the bicycle StreetScore+ QOS at the northbound approach would not improve, bicyclists would no longer move left across the right-turn conflict area and Right Turn On Red would be reduced because vehicles would no longer have a designated right- turn lane. The City of Menlo Park's *El Camino Real Corridor Study* (approved May 2016) proposes buffered Class II facilities (bicycle lanes) between Encinal Avenue and Middle Avenue as part of the preferred alternative (Alternative 2). At the Ravenswood Avenue intersection, the northbound approach includes a left-turn lane, three through lanes, a bicycle lane, and a right-turn lane. This improvement is essentially consistent with the proposed mitigation and allows separate through and right-turn lanes. Thus, the proposed mitigation would not conflict with the City's planned

Class II facility at this location. ~~The San Mateo *County Comprehensive Bicycle and Pedestrian Plan* (2011) and the City of Menlo Park *Comprehensive Bicycle Development Plan* (2005) propose Class III bike routes on El Camino Real at Valparaiso Avenue. The proposed mitigation measure would not conflict with a Class III bikeway~~.

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-133, fifth paragraph, the following text has been modified in response to Comment A-MV-2.

The City of Mountain View has approved plans to close Castro Street (the west leg) at the train tracks, which would change the current four-leg intersection to a T-intersection of Central Expressway and Moffett Boulevard. This improvement would not require any additional right-of-way if implemented by the City of Mountain View. Given that this is the City's preferred improvement and would reduce the contribution of the proposed Project to this significant cumulative impact to a less-than-considerable level, the closure of Castro Street is the identified mitigation measure at this intersection.~~; if Castro Street is independently closed by the City of Mountain View, Stanford would not need to contribute funding to any improvements at this intersection.~~

Draft EIR Section 5.15 Transportation and Traffic, 5.15-134, the following text has been added following the third full paragraph for Intersection #89 in response to Comment A-MV-2:

Stanford will contribute its fair-share funding toward the second southbound left-turn lane from Central Expressway to Moffett Boulevard. The funding can be used for the Castro Street closure project.

Draft EIR Section 5.15 Transportation and Traffic, Table 5.15-31 on pages 5.15-135 and 5.15-136, has been replaced to reflect updated results based upon the 4-lane configuration for Page Mill Road. For readability purposes, the entire table was replaced with a revised Table 5.15-31.

Draft EIR Section 5.15, Table 5.15-31 on pages 5.15-135 and 5.15-136, to correlate with the previously described revisions to Mitigation Measure 5.15-2, references to MM 5.15-2 are revised as MM 5.15-2(a) (see following table).

Updated results based upon the 4-lane configuration for Page Mill Road resulted in identification of two additional freeway segments that would meet the threshold for significant impacts. Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15 10 on page 5.15-137, the text for conditions at Southbound I-280 is revised as follows:

- Southbound I-280
  - Sheep Camp Trail to Edgewood Road (AM peak hour);
  - Woodside Road to Sand Hill Road (AM peak hour):
  - Magdalena Avenue to Foothill Expressway (PM peak hour);
  - Foothill Expressway to SR 85 (PM peak hour);
  - State Route 85 to De Anza Boulevard (PM peak hour);
  - De Anza Boulevard to Wolfe Road (PM peak hour).

TABLE 5.15-31
2035 CUMULATIVE WITH PROJECT INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project		Mitigation Measure	2035 Cumulative With Project (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**136.9** 18.4	**F** B-	**155.2** 18.6	**F** B-	See MM 5.15-2(a) (Table 1)	**68.1** 15.7	**E** B	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**180.4** **162.9**	**F** **F**	**186.9** **175.2**	**F** **F**	See MM 5.15-2(a) (Table 1)	**147.8** **162.5**	**F** **F**	LTS/SU
19	Hanover Street / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**85.6** 51.9	**F** D-	**92.1** 52.8	**F** D-	See MM 5.15-2(a) (Table 1)	73.7 50.3	E D	LTS/SU
20	El Camino Real / Page Mill Road – Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	75.1 **83.1**	E- **F**	**84.9** **90.2**	**F** **F**	See MM 5.15-2(a) (Table 1)	69.7 **82.4**	E **F**	LTS/SU
21	Middlefield Road / Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	**122.7** **101.5**	**F** **F**	**125.6** **103.6**	**F** **F**	N/A (no feasible improvements)			SU
29	Foothill Expressway / Hillview Avenue	Santa Clara County	LOS E	AM PM	**124.6** 58.3	**F** E+	**135.0** 64.2	**F** E	N/A (no feasible improvements)			SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**194.5** **202.5**	**F** **F**	**201.2** **208.9**	**F** **F**	See MM 5.15-2(a) (Table 1)	41.9 70.7	D E	LTS/SU
31	Foothill Expressway / San Antonio Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	38.8 **165.8**	D+ **F**	43.2 **171.0**	D **F**	See MM 5.15-2(a) (Table 1)	43.2 46.4	D D	LTS/SU
32	Foothill Expressway / El Monte Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**142.6** **133.5**	**F** **F**	**149.3** **137.9**	**F** **F**	See MM 5.15-2(a) (Table 1)	75.0 **113.9**	E **F**	LTS/SU
33	Foothill Expressway / Springer Road – Magdalena Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**128.7** **151.5**	**F** **F**	**131.9** **154.4**	**F** **F**	See MM 5.15-2(a) (Table 1)	**122.9** **147.7**	**F** **F**	LTS/SU
37	El Camino Real / Encinal Ave	Menlo Park	LOS D	AM PM	44.9 **89.9**	D **F**	45.4 **92.9**	D **F**	See MM 5.15-2(a) (Table 1)	35.5 67.2	D+ E	LTS/SU
38	El Camino Real / Valparaiso Ave	Menlo Park	LOS D	AM PM	53.5 **56.0**	D- **E+**	54.0 **57.4**	D- **E+**	See MM 5.15-2(a) (Table 1)	52.5 52.3	D- D-	LTS/SU
41	El Camino Real / Ravenswood Road	Menlo Park	LOS D	AM PM	48.0 **63.8**	D **E**	48.7 **65.8**	D **E**	See MM 5.15-2(a) (Table 1)	47.6 **63.7**	D **E**	LTS/SU

TABLE 5.15-31 (CONTINUED)
2035 CUMULATIVE WITH PROJECT INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project		Mitigation Measure	2035 Cumulative With Project (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
48	El Camino Real / Embarcadero Road	Palo Alto (SC CMP)	LOS E	AM PM	56.9 72.1	E+ E	60.4 **82.2**	E **F**	See MM 5.15-2(a) (Table 1)	53.0 71.7	D- E	LTS/SU
56	Alma Street / Hamilton Avenue	Palo Alto	LOS D	AM PM	10.2 **57.7**	B+ **E+**	10.4 **60.0**	B+ **E**	See MM 5.15-2(a) (Table 1)	10.0 39.3	B+ D	LTS/SU
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	**123.4** **121.5**	**F** **F**	**127.3** **126.7**	**F** **F**	See MM 5.15-2(a) (Table 1)	**120.5** **123.2**	**F** **F**	SU
59	Middlefield Road / Marsh Road	Atherton	LOS D	AM PM	**76.9** **76.0**	**E-** **E-**	**79.7** **77.4**	**E-** **E-**	See MM 5.15-2(a) (Table 1)	41.7 68.6	D E	LTS/SU
63	Middlefield Road / Lytton Avenue	Palo Alto	LOS D	AM PM	49.2 **66.1**	D **E**	51.1 **70.1**	D- **E**	N/A (no feasible improvements)			SU
66	Middlefield Road / Embarcadero Road	Palo Alto	LOS D	AM PM	55.0 **68.1**	D- **E**	**59.4** **72.9**	**E+** **E**	N/A (no feasible improvements)			SU
89	Central Expwy / Castro St-Moffett Blvd	Santa Clara Co. (SC CMP)	LOS E	AM PM	**240.1** **222.1**	**F** **F**	**243.7** **225.7**	**F** **F**	See MM 5.15-2(a) (Table 1)	85.2 94.0	F F	LTS/SU
90	Foothill Expressway / Edith Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	55.9 **105.5**	E+ **F**	61.5 **112.6**	E **F**	N/A (no feasible improvements)			SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.
[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.
[c] AM = morning peak traffic hour, PM = evening peak traffic hour.
[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.
[f] LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection;
SU = significant and unavoidable.

SOURCE: Fehr & Peers, September 2018.

TABLE 5.15-31
2035 CUMULATIVE WITH PROJECT INTERSECTION LEVELS OF SERVICE
(MITIGATED CONDITIONS)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project		Mitigation Measure	2035 Cumulative With Project (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**136.9** 18.4	**F** B	**155.2** 18.6	**F** B	See MM 5.15-2 (Table 1)	**68.1** 15.7	**E** B	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**163.6** **152.6**	**F** **F**	**167.7** **163.7**	**F** **F**	See MM 5.15-2 (Table 1)	**130.1** **150.4**	**F** **F**	LTS/SU
19	Hanover Street / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**90.7** 52.7	**F** D	**97.6** 53.8	**F** D	See MM 5.15-2 (Table 1)	76.6 50.9	E D	LTS/SU
20	El Camino Real / Page Mill Road – Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	76.4 **83.1**	E **F**	**86.3** **90.8**	**F** **F**	See MM 5.15-2 (Table 1)	70.7 **83.0**	E **F**	LTS/SU
21	Middlefield Road / Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	**122.6** **101.6**	**F** **F**	**125.5** **103.7**	**F** **F**	N/A (no feasible improvements)			SU
29	Foothill Expressway / Hillview Avenue	Santa Clara County	LOS E	AM PM	**121.1** 48.2	**F** D	**131.6** 52.4	**F** D	N/A (no feasible improvements)			SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**293.4** **211.5**	**F** **F**	**298.6** **217.3**	**F** **F**	See MM 5.15-2 (Table 1)	41.4 74.0	D E	LTS/SU
31	Foothill Expressway / San Antonio Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	36.0 **156.3**	D+ **F**	40.1 **161.2**	D **F**	See MM 5.15-2 (Table 1)	40.1 45.4	D D	LTS/SU
32	Foothill Expressway / El Monte Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**142.1** **123.9**	**F** **F**	**148.9** **128.4**	**F** **F**	See MM 5.15-2 (Table 1)	74.1 **110.3**	E **F**	LTS/SU
33	Foothill Expressway / Springer Road – Magdalena Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**128.7** **148.3**	**F** **F**	**131.9** **151.1**	**F** **F**	See MM 5.15-2 (Table 1)	**123.0** **144.9**	**F** **F**	LTS/SU
37	El Camino Real / Encinal Ave	Menlo Park	LOS D	AM PM	44.9 **89.9**	D **F**	45.4 **92.9**	D **F**	See MM 5.15-2 (Table 1)	35.5 **67.2**	D+ **E**	LTS/SU
38	El Camino Real / Valparaiso Ave	Menlo Park	LOS D	AM PM	53.5 **56.0**	D- **E+**	54.0 **57.4**	D- **E+**	See MM 5.15-2 (Table 1)	52.5 52.3	D- D-	LTS/SU
41	El Camino Real / Ravenswood Road	Menlo Park	LOS D	AM PM	48.0 **63.8**	D **E**	48.7 **65.8**	D **F**	See MM 5.15-2 (Table 1)	47.6 **63.7**	D **E**	LTS/SU

TABLE 5.15-31 (CONTINUED)
2035 CUMULATIVE WITH PROJECT INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Project		Mitigation Measure	2035 Cumulative With Project (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
48	El Camino Real / Embarcadero Road	Palo Alto (SC CMP)	LOS E	AM PM	56.9 72.1	E+ E	60.4 **82.2**	E **F**	See MM 5.15-2 (Table 1)	53.1 71.1	D- E	LTS/SU
56	Alma Street / Hamilton Avenue	Palo Alto	LOS D	AM PM	10.2 **57.7**	B+ **E+**	10.4 **60.0**	B+ **E**	See MM 5.15-2 (Table 1)	10.0 39.3	B+ D	LTS/SU
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	123.7 117.4	**F** **F**	127.5 **122.5**	F **F**	See MM 5.15-2 (Table 1)	121.7 **119.9**	F **F**	SU
59	Middlefield Road / Marsh Road	Atherton	LOS D	AM PM	**76.9** **76.0**	**E-** **E-**	**79.7** **77.4**	**E-** E	See MM 5.15-2 (Table 1)	41.7 **68.6**	D **E**	LTS/SU
63	Middlefield Road / Lytton Avenue	Palo Alto	LOS D	AM PM	49.2 **66.1**	D **E**	51.1 **70.1**	D- **E**	N/A (no feasible improvements)			SU
66	Middlefield Road / Embarcadero Road	Palo Alto	LOS D	AM PM	55.0 **68.1**	D- **E**	**60.2** **73.7**	**E** **F**	N/A (no feasible improvements)			SU
89	Central Expwy / Castro St-Moffett Blvd	Santa Clara Co. (SC CMP)	LOS E	AM PM	**249.9** **221.4**	**F** **F**	**245.4** **225.0**	**F** E	See MM 5.15-2 (Table 1)	**85.9** **93.0**	**F** **F**	LTS/SU
90	Foothill Expressway / Edith Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	52.2 **92.8**	D- **F**	57.5 **99.7**	E+ **F**	N/A (no feasible improvements)			SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.
[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.
[c] AM = morning peak traffic hour, PM = evening peak traffic hour.
[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.
[f] LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection;
SU = significant and unavoidable.

SOURCE: Fehr & Peers, August 2017.

Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-10, last paragraph, fourth sentence on page 5.15-137, to correlate with the previously described revisions to Mitigation Measure 5.15-2, reference to Mitigation Measure 5.15-2 is revised as Mitigation Measure 5.15-2(a), as follows:

> Mitigation Measure 5.15-2(a) would reduce the Projects' contribution to significant cumulative impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fair share fees paid by Stanford for exceeding the No Net New Commute Trips standard to fund transportation mitigation efforts~~alternative programs to reduce trips~~.

A number of modifications have been made to the TIA and Draft EIR in response to Comment A-PA-111. Corrections to the Page Mill Road on-ramp and off-ramp queueing analysis were made to change the ramp terminal control assumption from stop-controlled to signalized, consistent with the intersection analysis. Corrections to the Alpine Road on-ramp and off-ramp analysis were made to correct minor volume errors. These changes resulted in the removal of two ramps with queues projected to exceed available storage, but do not affect the impact findings.

Draft EIR Section 5.15 Transportation and Traffic, the section "Freeway Off-Ramps" beginning on Draft EIR page 5.15-138 and ending on Draft EIR page 5.15-141 is shown below, with the noted changes (note that in addition, the years shown in the title of Table 5.15-32 and the ramp type descriptions in Table 5.15-35 were incorrect in the Draft EIR, and are corrected as shown):

> As shown in **Table 5.15-34**, all off-ramps would accommodate vehicle queues within the available ramp storage, with the exception of the I-280 / Sand Hill Road northbound off-ramp, on which excessive queues would result in a queue spillback onto the freeway mainline of 940 feet and 1,030 feet without and with the proposed Project, respectively. Additionally, the following queues would exceed the available turn-pocket storage queue:
>
> - US 101 / University Avenue southbound loop off-ramp – right-turn queue would exceed pocket storage length during the AM and PM peak periods, without and with the Project
> - I-280 / Sand Hill Road northbound diagonal off-ramp – right-turn queue would exceed pocket storage length during the AM and PM peak periods, without and with the Project
> - I-280 / Page Mill Road northbound diagonal off-ramp – left-turn queue would exceed pocket storage length during the AM and PM peak period, without and with the proposed Project
> - ~~I-280 / Page Mill Road southbound diagonal off-ramp – left-turn queue would exceed pocket storage length during the AM and PM peak periods, without and with the proposed Project~~
>
> While these turn queues would exceed the available turn pocket storage, the queues would still be served within the total ramp storage, and would not spillback into the freeway mainline.

TABLE 5.15-32
2035 FREEWAY METERED ON-RAMP QUEUING EVALUATION
(2035 CUMULATIVE~~2018 BASELINE~~ AND 2035 CUMULATIVE~~2018 BASELINE~~ WITH PROJECT)

On-Ramp	Storage Capacity (feet)[a]	Peak Period[b]	2035 Cumulative No Project		2035 Cumulative with Project	
			Ramp Volume	Min. / Max. Queue (feet)[c]	Ramp Volume	Min. / Max. Queue (feet)[c]
Oregon Expressway (US 101 Southbound)	1,400	AM PM	1,304 1,416	30 / **18,300** 30 / **77,610**	1,310 1,429	30 / **18,390** 30 / **78,870**
Embarcadero Road (US 101 Southbound)	1,150	AM PM	813 726	30 / **18,450** 750 / **24,120**	829 758	30 / **19,290** 1,080 / **27,270**

Bold text indicates conditions where the queue exceeds the available storage capacity.

[a] Vehicle storage capacity is defined as the length of the longest mixed-flow lane available for vehicle queuing. Length is measured from gore point to gore point or where any queue spillback has the potential to block other movements.
[b] AM peak period – 6:00 AM to 9:00 AM. PM peak period – 3:00 PM to 7:00 PM.
[c] Minimum queues estimated using the maximum metering rates provided by Caltrans. Maximum queues estimated using the minimum metering rates provided by Caltrans. The minimum queue is one vehicle, which is equal to 30 feet.

SOURCE: Caltrans, April 2017; and Fehr & Peers, September 2018~~August 2017~~.

TABLE 5.15-33
2035 FREEWAY NON-METERED ON-RAMP VOLUMES AND STORAGE CAPACITY
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)

On-Ramp	Storage Capacity (feet)[a]	Peak Period[b]	Cumulative (2035) No Project Volume	Cumulative (2035) with Project Volume
US 101 Northbound On-Ramps				
Willow Road	650	AM PM	411 352	413 358
University Avenue	880	AM PM	391 121	393 125
I-280 Northbound On-Ramps				
Sand Hill Road	1,460	AM PM	648 1,526	692 1,627
Alpine Road	1,000	AM PM	360 710	360 710
Page Mill Road	700	AM PM	863~~923~~ 1,395~~1,445~~	866~~939~~ 1,401~~1,474~~
I-280 Southbound On-Ramps				
Page Mill Road	1,500	AM PM	706 1,189	750 1,278
Alpine Road	650	AM PM	386~~376~~ 591~~561~~	402~~376~~ 620~~561~~
Sand Hill Road	800	AM PM	330 1,130	338 1,141

Bold text indicates conditions where the queue exceeds the available storage capacity.

[a] Vehicle storage capacity is defined as the length of the longest mixed-flow lane available for vehicle queuing. Length is measured from gore point to gore point or where any queue spillback has the potential to block other movements.
[b] AM peak period – 6:00 AM to 9:00 AM. PM peak period – 3:00 PM to 7:00 PM.

SOURCE: Caltrans, April 2017; and Fehr & Peers, September 2018~~August 2017~~.

TABLE 5.15-34
2035 FREEWAY OFF-RAMP QUEUING EVALUATION
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT):
SIGNALIZED AND STOP-CONTROLLED TERMINAL INTERSECTIONS

Off-Ramp	Storage Capacity (feet)[a]	Peak Period[b]	Cumulative (2035) No Project		Cumulative (2035) with Project	
			Ramp Volume[c]	Queue (feet)[d]	Ramp Volume[c]	Queue (feet)[d]
US 101 Southbound Off-Ramps						
Willow Road	1,025/1,025	AM PM	160 / 432 470 / 401	150 / 510 480 / 420	160 / 440 470 / 404	150 / 510 480 / 420
University Avenue	1,870 / 190	AM PM	262 / 250 190 / 590	540 / **510** 300 / **690**	267 / 250 193 / 590	540 / **510** 300 / **720**
I-280 Northbound Off-Ramps						
Sand Hill Road	740 / 300	AM PM	100 / 630 50 / 230	90 / **1,680** 90 / **450**	100 / 633 50 / 235	120 / **1,770** 90 / **450**
Alpine Road[f]	1,360 / 280	AM PM	250 / 8521 130 / 269	430 / [e] 30 / [e]	250 / 8850 130 / 291	430 / [e] 30 / [e]
Page Mill Road	60 / 1,830	AM PM	2540 / 1,719839 1250 / 24312	**600840** / [e] **390150** / [e]	2540 / 1,806926 1250 / 3077	**600840** / [e] **390210** / [e]
I-280 Southbound Off-Ramps						
Alpine Road	1,370 / 450	AM PM	390 / 550 160 / 320	2540 / [e] 60 / [e]	390 / 550 160 / 320	2540 / [e] 60 / [e]
Page Mill Road[f]	150 / 1,940	AM PM	1,612 / 50 1,11256 / 50	**1,26710** / [e] **1,08140** / [e]	1,615 / 50 1,123263 / 50	**1,290740** / [e] **1,1170** / [e]

Bold text indicates conditions where the queue exceeds the turn pocket capacity.

[a] Vehicle storage capacity is defined as the length of the longest mixed-flow lane available for vehicle queuing. Length is measured from gore point to gore point or where any queue spillback has the potential to block other movements. Storage Capacity for a Controlled Ramp - ##/## = left-turn and (or) through pocket / right-turn pocket

[b] AM peak period – 6:00 AM to 9:00 AM. PM peak period – 3:00 PM to 7:00 PM.

[c] Ramp volume by turning movement - ##/## = left-turn and (or) through movement / right-turn movement

[d] The queue indicated represents the 95th Percentile Queue for signalized movements and the Average Queue for stop- controlled movements - ##/## = left-turn and (or) through queue / right-turn queue

[e] Only left-turn movement is stop-controlled. Free right-turn queues are not provided.

[f] For all-way stop-controlled ramp intersections, the average queue is reported due to the limitations of the *2000 HCM*.

SOURCE: Fehr & Peers, September 2018~~August 2017~~.

As shown in **Table 5.15-35**, most of the V/C ratios (for Cumulative (2035) Conditions without and with the Project) for the off-ramps with uncontrolled terminal intersections for the AM and PM peak periods would be less than 1.00, indicating that the off-ramps have sufficient capacity to accommodate the exiting volumes at these locations, except at~~with the following exceptions:~~ I-280 / Sand Hill Road southbound off-ramp (No Project V/C is 1.03, with Project V/C would be 1.10, in the AM peak period).

- ~~I-280 / Page Mill Road northbound off-ramp (No Project V/C is 0.97, with Project V/C would be 1.01, in the AM peak period);~~
- ~~I-280 / Sand Hill Road southbound off-ramp (No Project V/C is 1.03; with Project would be 1.0, in the AM peak period).~~

TABLE 5.15-35
2035 FREEWAY OFF-RAMP QUEUING EVALUATION
(2035 CUMULATIVE AND 2035 CUMULATIVE WITH PROJECT)
(UNCONTROLLED TERMINAL INTERSECTIONS)

Off-Ramp	Maximum Vehicle Flow Rate (Capacity, vphpl)[a]	Peak Period[b]	2035 Cumulative		2035 Cumulative with Project	
			Ramp Volume	Volume-to-Capacity Ratio	Ramp Volume	Volume-to-Capacity Ratio
US 101 Northbound Off-Ramps						
Embarcadero Road (loop)~~(diagonal)~~	1,800	AM PM	714 601	0.41 0.33	778 621	0.43 0.35
I-280 Northbound Off-Ramps						
Alpine Road (diagonal)~~(loop)~~[c]	1,900	AM PM	85~~2~~1 269	0.45~~3~~ 0.14	88~~5~~0 291	0.46~~5~~ 0.15
Page Mill Road (diagonal)~~(loop)~~[c]	1,900	AM PM	1,719~~839~~ 243~~1~~2	0.90~~7~~ 0.13~~8~~	1,806~~926~~ 30~~7~~7	0.95~~**1.01**~~ 0.16~~20~~
I-280 Southbound Off-Ramps						
Sand Hill Road (loop)~~(diagonal)~~	1,800	AM PM	1,860 720	**1.03** 0.40	1,974 780	**1.10** 0.43
Alpine Road (diagonal)~~(loop)~~[c]	1,900	AM PM	550 320	0.29 0.17	550 320	0.29 0.17
Page Mill Road (diagonal)~~(loop)~~[c]	1,900	AM PM	50 50	0.03 0.03	50 50	0.03 0.03

Bold text indicates the off-ramp does not have sufficient capacity to accommodate the exiting volumes.

[a] Diagonal ramps were assumed to have a capacity of 1,900 vehicles per hour per lane (vphpl). Loop ramps were assumed to have a capacity of 1,800 vphpl.
[b] AM peak period – 6:00 AM to 9:00 AM. PM peak period – 3:00 PM to 7:00 PM.
[c] The right-turn movement is uncontrolled. Therefore, the right-turn volume and V/C is the only ramp movement reported in the table.

SOURCE: Fehr & Peers, September 2018~~August 2017~~.

Draft EIR Section 5.15 Transportation and Traffic, Impact 5.5-10 on page 5.15-141, to correlate with the previously described revisions to Mitigation Measure 5.15-2, Mitigation Measure 5.15-2 is revised as Mitigation Measure 5.15-2(a), as follows:

Mitigation Measure: Implement Mitigation Measure 5.15-2(a).

Draft EIR Section 5.15 Transportation and Traffic, on page 5.15-141, to correlate with the previously described revisions to Mitigation Measure 5.15-2, the second sentence of the paragraph following Mitigation Measure 5.15-2, the text is revised as follows:

> Mitigation Measure 5.15-2(a) would reduce cumulative impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fair share fees paid by Stanford from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips.

Updated results based upon the 4-lane configuration for Page Mill Road resulted in modifications to Cumulative with Project transit route delays. Draft EIR Section 5.15 Transportation and Traffic Table 5.15-36 on page 5.15-142 has been revised as follows:

TABLE 5.15-36
2035 CUMULATIVE WITH PROJECT TRANSIT ROUTE DELAYS

Route		Direction	Peak Hour	Increased Average Delay with Project (seconds)
VTA 22	Palo Alto Transit Center to Eastridge Transit Center via El Camino	Eastbound	AM PM	12.2~~12.3~~ 35.8~~36.5~~
		Westbound	AM PM	20.9~~21.4~~ 17.4~~18.6~~
VTA 35	Downtown Mountain View to Stanford Shopping Center	Northbound	AM PM	11.8~~16.6~~ 22.0~~13.4~~
		Southbound	AM PM	16.7~~11.7~~ 13.2~~22.1~~
VTA 89	California Avenue Caltrain Station to Palo Alto Veterans Hospital	Northbound	AM PM	< 5.0 < 5.0
		Southbound	AM PM	< 5.0 < 5.0
VTA 102	South San Jose to Palo Alto	Northbound	AM	< 5.0
		Southbound	PM	16.7~~29.7~~
VTA 104	Penitencia Creek Transit Center to Palo Alto	Eastbound	PM	< 5.0
		Westbound	AM	26.3~~26.6~~
522	Palo Alto Transit Center to Eastridge Transit Center	Eastbound	AM PM	9.19~~.2~~ 34.1~~34.8~~
		Westbound	AM PM	20.9~~21.4~~ 17.4~~18.6~~
SamTrans 281	Onetta Harris Center to Stanford Shopping Center	Eastbound	AM PM	6.5~~6.4~~ 9.69.7
		Westbound	AM PM	< 5.0 < 5.0
SamTrans ECR	Daly City BART to Palo Alto Transit Center	Northbound	AM PM	< 5.0 10.0~~9.8~~
		Southbound	AM PM	< 5.0 < 5.0
AC Transit DB	Dumbarton Express - Union City BART to Stanford Oval	Eastbound	AM PM	< 5.0 7.4
		Westbound	AM PM	22.6 9.2
AC Transit DB1	Dumbarton Express 1 - Union City BART to Stanford Research Park	Eastbound	AM PM	<5.0 8.6~~13.1~~
		Westbound	AM PM	31.1~~28.4~~ 26.2~~26.0~~
AC Transit U	Fremont BART to Stanford Oval	Eastbound	PM	29.4
		Westbound	AM	17.0
Palo Alto Shuttle E	University Avenue Caltrain Station to Baylands Business Parks	Eastbound	AM PM	5.9 14.2~~13.9~~
		Westbound	AM PM	11.8 < 5.0
Palo Alto Shuttle C	University Avenue/Downtown to South Palo Alto at Charleston Road	Eastbound	AM PM	< 5.0 8.98~~8.7~~
		Westbound	AM PM	29.1 6.3~~6.1~~

SOURCE: Fehr & Peers, September 2018~~August 2017~~.

Since publication of the Draft EIR, OPR released a new (November 2017) version of the proposed amendments to the CEQA Guidelines and OPR released a new (April 2018) Technical Advisory. In addition, on July 2, 2018, modifications to the proposed amendments to the CEQA Guidelines were released. The following text changes reflect the date and content of this new information.

Draft EIR Section 5.15 Transportation and Traffic, under the topic Significance Criteria on pages 5.15-144 and 5.15-145, the text has been modified as follows:

Significance Criteria

In its ~~January 2016 *Revised*~~ November 2017 *Proposed Changes to the CEQA Guidelines*, OPR proposed~~s the following~~ criteria for analyzing transportation impacts of land use projects. On July 2, 2018, modifications to the proposed amendments to the CEQA Guidelines were released.[8A] The following reflects these revisions:

> Proposed New Section 15064.3. Determining the Significance of Transportation Impacts.
>
> *(a) Purpose.*
>
> *~~Section 15064 contains general rules governing the analysis, and the determination of significance of, environmental effects.~~ ~~S~~This section describes specific considerations ~~involving~~ for evaluating a project's transportation impacts ~~are described in this section~~. Generally, vehicle miles traveled is the most appropriate measure of a project's ~~potential~~ transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel ~~and safety of all travelers~~. Except as provided in subdivision (b)(2) below (regarding highway capacity), a ~~A~~ project's effect on automobile delay ~~does~~ shall not constitute a significant environmental impact.*
>
> *(b) Criteria for Analyzing Transportation Impacts.*
>
> *~~Lead Agencies may use thresholds of significance for vehicle miles traveled recommended by other public agencies or experts provided the threshold is supported by substantial evidence.~~*
>
> *~~(1) Vehicle Miles Traveled and~~ Land Use Projects. ~~A development project that results in~~ V~~v~~ehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, ~~development~~ projects ~~that locate~~ within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should ~~may~~ be presumed to cause a less-than-significant transportation impact. ~~Similarly, development~~ P~~p~~rojects that decrease vehicle miles traveled in the project area compared to existing conditions should ~~may~~ be ~~considered~~ presumed to have a less than significant transportation impact. ~~(Section II, Page II: 7)~~*

Other than the two presumptions listed in proposed CEQA Guidelines section 15064.3(b)(1), OPR does not propose to establish numeric significance criteria through the CEQA Guidelines. OPR's April 2018 ~~January 2016 draft~~ *Technical Advisory on Evaluating Transportation Impacts in CEQA* provides numeric thresholds that an agency could choose to use when assessing the significance of a project's additional vehicle miles traveled in the event that the presumptions in proposed CEQA Guidelines section 15064.3(b)(1) do not apply.

Based on OPR's November 2017 ~~January 2016 *Revised* *Proposed Changes to the CEQA Guidelines*~~, the July 2018 modifications to the proposed amendments to the CEQA Guidelines, and OPR's ~~draft~~ *Technical Advisory on Evaluating Transportation Impacts in CEQA*, the following significance criteria were used to assess VMT for the proposed 2018 General Use Permit:

1. Is the project within one-half mile of an existing major transit stop or an existing stop along a high quality transit corridor? If so, the project is presumed to result in a less than-significant impact on VMT.
2. Alternatively, the proposed Project is considered to result in a significant impact to VMT if project-related VMT would exceed the following numeric thresholds:
    - Residential Per Capita Daily VMT: A project exceeding ~~*both* existing household daily VMT per capita in the aggregate of all incorporated jurisdictions in the County minus 15 percent, *and*~~ existing regional household daily VMT per capita minus 15 percent.
    - Worker Per Capita Daily VMT: A project exceeding a level of 15 percent below existing regional daily VMT per worker.

[8A] Attachment A (Proposed 15-day Modifications) to the California Natural Resources Agency Notice of Public Availability of Modifications to Text of Proposed Regulation and Addendum to the Initial Statement of Reasons and Informative Digest (July 2, 2018).

Draft EIR Section 5.15 Transportation and Traffic, under the topic Benchmarks Included in the Analysis on page 5.15-146, the text has been modified as follows:

Benchmarks Included in the Analysis

Based on the OPR guidance described above, the numeric benchmarks against which the proposed 2018 General Use Permit worker and resident VMT were compared are:

- the Bay Area regional daily average home-based-work VMT per worker; and
- ~~both~~ the Bay Area regional daily average ~~and the Santa Clara County daily average~~ home based VMT per capita.
- The VTA transportation model is a trip-based model developed and validated for the estimation of trips made for home-based work, home-based non-work and non-home based trips. OPR's draft Technical Advisory states that home-based trips can be the focus for analysis of residential projects, and home-based-work trips can be the focus of the analysis for office projects. Therefore, the VTA model is a reliable source to

establish the Bay Area and Santa Clara County average daily VMT per worker and per capita at an aggregate level.

~~The draft *Technical Advisory* recommends that the benchmark for residential projects should be the higher of the county-level (aggregate of all incorporated jurisdictions) and regional averages. In this case, the regional average is higher and thus represents the benchmark for residential VMT generation.~~

OPR's draft *Technical Advisory* recommends setting thresholds of significance at 15 percent below the regional benchmark for average daily VMT per worker[9] or per capita. Taking all of these recommendations into account, **Table 5.15 37** indicates the VMT generation thresholds to be applied to the proposed 2018 General Use Permit.[10]

Modifications have been made in response to Comments A-CALTN-7, A-CALTN-8, A-CALTN-9, A-CALTN-10 and A-CALTN-11. Draft EIR Section 5.15 Transportation and Traffic, page 5.15-157, last sentence is updated to clarify that train car length is 5 to 6 in 2018:

Another important improvement that will significantly expand capacity is a platform expansion and train program that would allow trains to increase from 5 to 6 cars per train to 8 cars per train.

Draft EIR Section 5.15 Transportation and Traffic, Table 5.15-43 on page 5.15-158 is updated to reflect comments from Caltrain on capacity assumptions in 2018 and 2035.

TABLE 5.15-43
CALTRAIN CAPACITY ASSUMPTIONS

	2018	2035
Train type	Diesel Locomotive	Electrical Multiple Unit
Seats per car	~~130~~ 126	~~112~~ 94
Train length	5 to 6 cars	8 cars
Trains per peak hour	5	6
Seated capacity	~~3,250~~ 3,705	~~5,370~~ 4,512
Total capacity (120% of seats)	**~~3,900~~ 4,446**	**~~6,444~~ 5,414**

NOTE: capacity numbers are rounded

SOURCE: Arup, Core Capacity Study, Caltrain Short Range Transit Plan: FY2015-2024, Scanlon, 2018

Draft EIR Section 5.15 Transportation and Traffic, Figure 5.15-13 on page 5.15-161 is replaced below to reflect revised capacity assumptions.

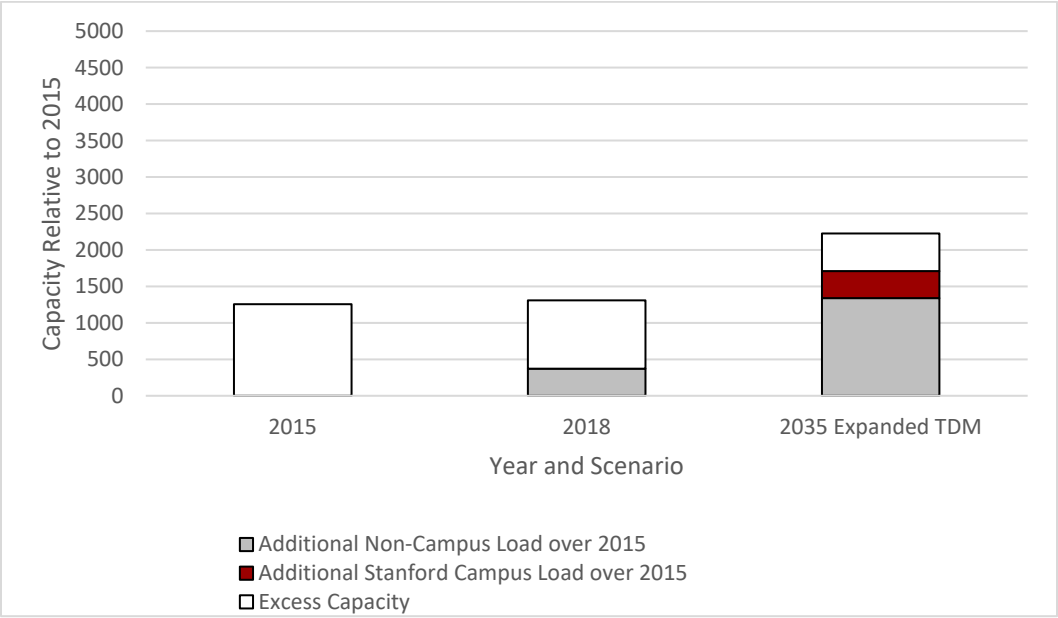


Figure 5.15-13 (Revised)
Caltrain AM Peak Hour Northbound Passenger Load by User Type at California Avenue Station – Expanded TDM Scenario

Draft EIR Section 5.15 Transportation and Traffic, Figure 5.15-14 on page 5.15-161 is replaced below to reflect revised capacity assumptions.

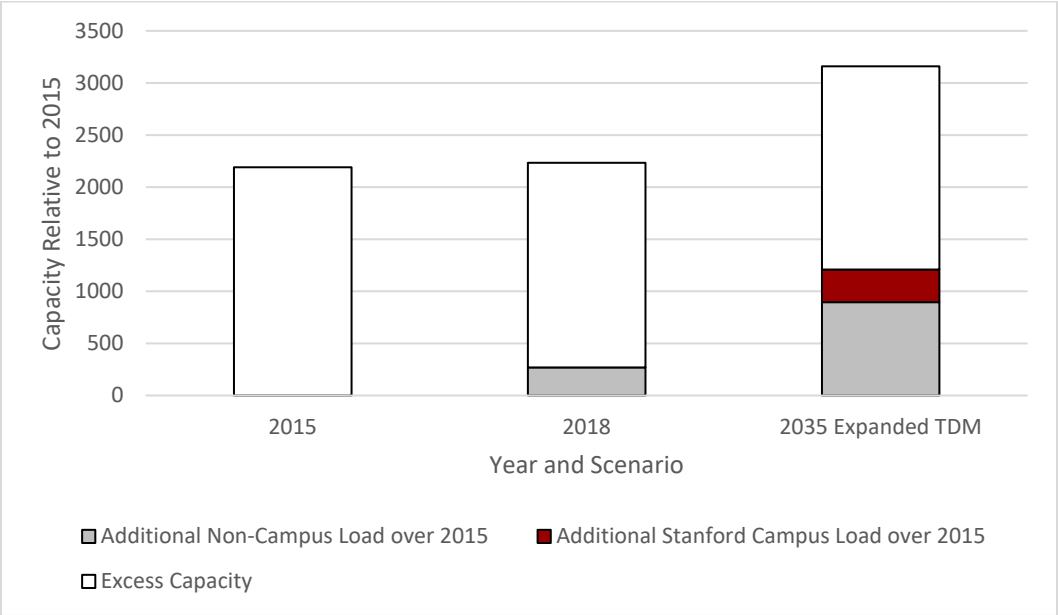


Figure 5.15-14 (Revised)
Caltrain AM Peak Hour Southbound Passenger Load by User Type at the San Carlos Station – Expanded TDM Scenario

Draft EIR Section 5.15 Transportation and Traffic, Figure 5.15-15 on page 5.15-162 is replaced below to reflect revised capacity assumptions.

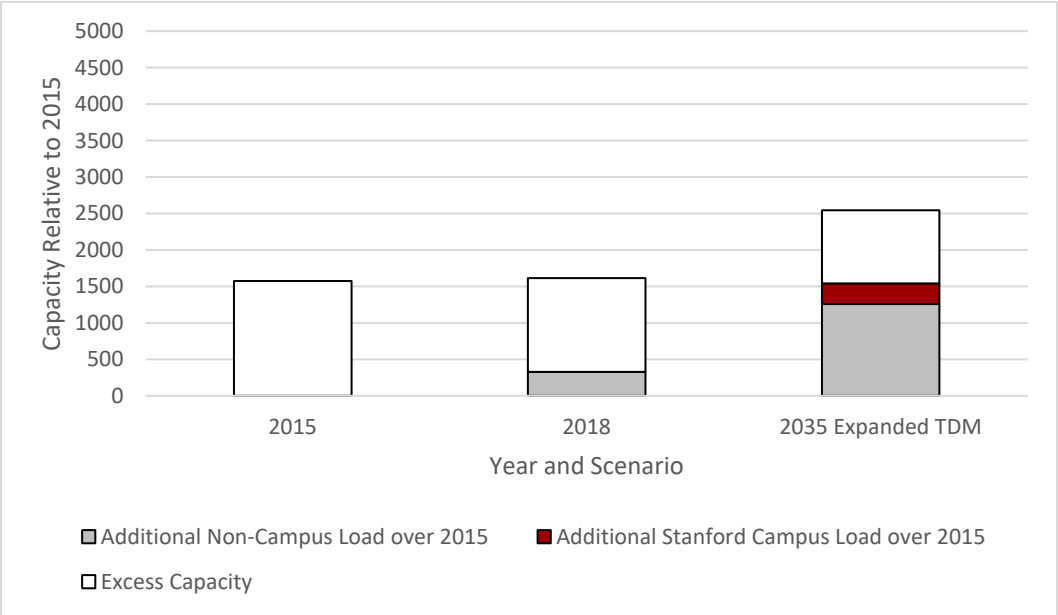


Figure 5.15-15 (Revised)
Caltrain PM Peak Hour Northbound Passenger Load by User Type
at the San Carlos Station – Expanded TDM Scenario

Draft EIR Section 5.15 Transportation and Traffic, Figure 5.15-16 on page 5.15-162 is replaced below to reflect revised capacity assumptions.

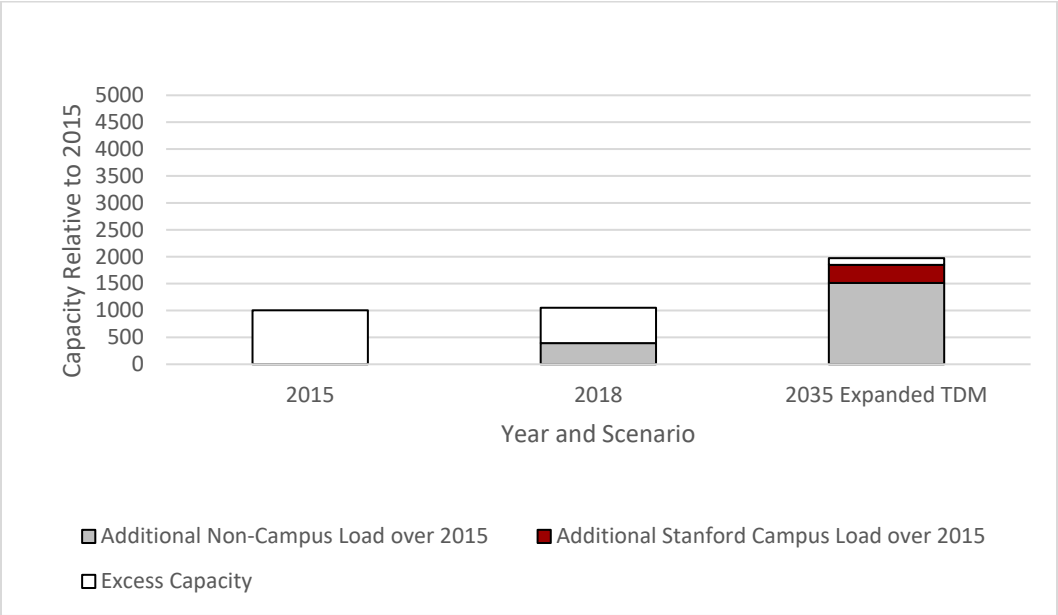


Figure 5.15-16 (Revised)
Caltrain PM Peak Hour Southbound Passenger Load by User Type
at California Avenue Station – Expanded TDM Scenario

Draft EIR Section 5.15 Transportation and Traffic, page 5.15-163, first paragraph, second to last sentence is clarified to indicate that train car length is 5 to 6 in 2018:

> During the 2018 General Use Permit, capacity is expected to increase with electrification and other modernizations allowing for an additional peak hour train trip and, even more significantly, an expansion from five/six-car to eight-car trains.

Draft EIR Section 5.16, Utilities and Service Systems

Draft EIR Section 5.16 Utilities and Services Systems, page 5.16-18, Table 5.16-2, first column, second to last row is corrected from "met by surface water" to "met by groundwater," as follows:

TABLE 5.16-2
SUMMARY OF PROJECTED DRY YEAR SUPPLY AND DEMAND

Water Use Category	Water Year Type				
	Normal Year	Single Dry Year	Multiple Dry Years		
			1	2	3
Supply					
Potable Supply (SFPUC)					
ISG[a]	3.03	2.51	2.51	2.18	2.18
ISL[b]	2.91	2.42	2.42	2.10	2.10
Surface Water Supply	1.12	0.94	0.94	0.06	0.06
Groundwater Supply	1.52	1.52	1.52	1.52	1.52
Total Supply (ISG)	**5.67**	**4.97**	**4.97**	**3.76**	**3.76**
Total Supply (ISL)	**5.55**	**4.88**	**4.88**	**3.68**	**3.68**
2035 Demands					
Potable Demand	2.44	2.46	2.46	2.07	1.83
met by ISL	2.44	2.46	2.46	2.07	1.83
Non-potable Demand	1.35	1.42	1.42	1.08	1.08
met by surface water	1.12	0.94	0.94	0.06	0.06
met by ~~surface~~ groundwater	0.23	0.48	0.48	1.02	1.02
Total Demand	**3.79**	**3.87**	**3.87**	**3.15**	**2.91**

NOTES: Numbers are rounded.

[a] ISG = Individual Supply Guarantee allocation from SFPUC
[b] ISL = Interim Supply Guarantee Limitation allocation from SFPUC

SOURCE: Schaaf & Wheeler, 2017 (Appendix WSA)

Recirculated Portions of Draft EIR Section 7.4.4, Additional Housing Alternative A – Air Quality

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, last paragraph, last two sentences on page 2-75, are revised to reference Mitigation Measure 7A.15-2(a):

> These approaches are formalized in **Mitigation Measure 7A.15-2(a)** under Transportation and Traffic, below. Mitigation Measure 7A.15-2(a) would also serve the purpose to reduce mobile emissions, including $PM_{10,}$ under this alternative to the extent the No Net New Commute Trips standard is achieved.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-77, in response to Comment A-MP-17, the mitigation for Impact 7A.2-4 is revised to reference Mitigation Measure 7A.15-2(a).

> **Mitigation:** Implement Mitigation Measure 7A.15-2(a).

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, pages 2-81 to 2-82, the mitigation for Impact 7A.2-8 is revised to reference Mitigation Measure 7A.15-2(a).

> **Mitigation:** Implement the following mitigation measures:
>
> Mitigation Measure 7A.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*
>
> Mitigation Measures 7A.3-8(a)-(b): *Mitigation for native oak woodland.*
>
> Mitigation Measure 7A.3-9(a)-(c): *Mitigation for wetlands.*
>
> Mitigation Measure 7A.3-11(a)-(c): *Mitigation for protected trees*.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-82, paragraph following Significance after Mitigation: Significant and Unavoidable, third sentence, Mitigation Measure 7A.15-2 is revised as Mitigation Measure 7A.15-2(a).

> As discussed in Mitigation Measure 7A.15-2(a) in the Transportation and Traffic section, Stanford would mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of funding equivalent to Stanford's fair~~proportionate~~ share of the cost of improvements for adversely affected intersections, the former of which has the potential to reduce VMT.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-83, the mitigation for Impact 7A.2-9 is revised to reference Mitigation Measure 7A.15-2(a).

> **Mitigation:** Implement the following mitigation measures:
>
> > Mitigation Measure 7A.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of funding equivalent to Stanford's fair~~proportionate~~ share of the cost of improvements to fund transportation mitigation efforts.*

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-82, paragraph following Significance after Mitigation: Significant and Unavoidable, second sentence, Mitigation Measure 7A.15-2 is revised as Mitigation Measure 7A.15-2(a).

> As discussed in Mitigation Measure 7A.15-2(a) in the Transportation and Traffic section, Stanford would mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of funding equivalent to Stanford's fair~~proportionate~~ share of the cost of improvements for adversely affected intersections, the former of which has the potential to reduce VMT.

Recirculated Portions of Draft EIR Section 7.4.4, Additional Housing Alternative A – Biological Resources

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, Mitigation Measure 7A.3-9(c) on page 2-94, is revised in response to Comment A-SCVWD-10:

> **Mitigation Measure 7A.3-9(c):** *Jurisdictional waters or wetland replacement.* If the County Planning Office determines that avoidance of jurisdictional waters or wetlands is not feasible, Stanford shall obtain all appropriate permits or approval for work in jurisdictional waters (i.e., Waters of the State or Waters of the U.S.), from applicable agencies, including but not necessarily limited to, ~~wetland work from~~ the U.S. Army Corps of Engineers, ~~or~~ San Francisco Bay Regional Water Quality Control Board, and California State Department of Fish and Wildlife. ~~As specified by the Corps or Regional Water Quality Control Board, a~~Any jurisdictional waters or wetlands that are filled as a result of project development shall be replaced through the creation, preservation or restoration of jurisdictional waters or wetlands or through other measures that the agencies deem appropriate through permit requirements to adequately mitigate the impact. Potential measures may include the following:
>
> - For creek projects, remove hardscape features from the stream channel and stream banks.
> - Stabilize exposed slopes or streambanks immediately upon completion of construction activities.
> - To restore disturbed aquatic sites, a wetland mitigation and monitoring plan will be prepared that outlines the objectives to mitigate for construction impacts. At a

minimum the plan will include thresholds of replanting success (e.g., 90 percent plant survival after one year, 80 percent second year, and 70 percent third year), monitoring requirements (e.g., at least once each year to confirm site stability, plant viability, and to schedule weeding, as needed), and shall specify resource agency reporting requirements.

Recirculated Portions of Draft EIR Section 7.4.4, Additional Housing Alternative A – Greenhouse Gas Emissions

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-125 the mitigation for Impact 7A.7-2 is revised to reference Mitigation Measure 7A.15-2(a).

Mitigation: Implement the following mitigation measures:

Mitigation Measure 7A.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*

Mitigation Measures 7A.3-8(a)-(b): *Mitigation for native oak woodland.*

Mitigation Measure 7A.3-9(a)-(c): *Mitigation for wetlands.*

Mitigation Measure 7A.3-11(a)-(c): *Mitigation for protected trees.*

Recirculated Portions of Draft EIR Section 7.4.4, Additional Housing Alternative A – Hydrology and Water Quality

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.9-8 second paragraph on page 2-140, in response to Comment A-SCVWD-10, the supporting impact discussion is revised as follows:

As with the proposed Project, construction and operation of the proposed development under this alternative, together with past, present and other reasonably foreseeable future projects in the vicinity could cumulatively decrease groundwater supplies and interfere with groundwater recharge. As discussed in Section 5.9, Hydrology and Water Quality, the Santa Clara Valley Groundwater Basin is not currently in an overdraft condition and is actively managed by the SCVWD. The SCVWD is designated by the DWR as the exclusive Groundwater Sustainability Agency (GSA) for the Santa Clara Subbasin, which comprises a portion of the larger Santa Clara Valley Basin. ~~which has recently submitted an application to serve as the Groundwater Sustainability Agency (GSA) for the basin in accordance with the Groundwater Sustainability Management Act.~~ A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. A GSA must submit and implement a GSP or prescribed alternative under the Sustainable Groundwater Management Act of 2014. The SCVWD submitted the 2016 Groundwater Management Plan for the Santa Clara and Llagas Subbasins to DWR as an Alternative to a GSP in

December 2016. Under this alternative, Stanford would also continue implementation of the Campus-wide Plan for Groundwater Recharge, as specified in Mitigation Measure 7A.9-4, above, to ensure that any loss of recharge areas due to new development under this alternative is addressed through management of Lagunita reservoir as described above. Therefore, considering the projected use of groundwater for the alternative, the proposed landscaping vegetation, current and future management of the groundwater basin and continued adherence to the groundwater recharge plan as overseen by SCVWD, there would be a less than significant cumulative impact to groundwater levels or supplies under this alternative.

Recirculated Portions of Draft EIR Section 7.4.4, Additional Housing Alternative A – Public Services

Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.13-1, page 2-157, last paragraph last sentence is edited consistent with similar changes made to Impact 5.13-1 above:

As under the proposed Project, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for ~~PAFD~~ fire protection/EMS services from the service provider(s)~~PAFD~~ and for communication and emergency dispatch services from the PAPD.

Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.13-2, page 2-158, the second to last paragraph is edited consistent with similar changes made to Impact 5.13-2 above:

As with the proposed Project, under this alternative, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for fire protection/EMS services from the service provider(s)~~PAFD~~. The City of Palo Alto and Stanford are currently under a five-year~~in negotiation for a 3-5 year~~ contract for PAFD to provide fire protection and EMS services to Stanford~~, with automatic renewal~~.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.13-4 last paragraph, second sentence on page 2-161, the following edits are made in response to Comment RO-Goldfarb-8:

In addition to reactivating existing school sites owned by PAUSD, such as Cubberley, Greendell and Garfield, the PAUSD also has several school properties currently leased to private school providers, such as Athena Academy, and Pinewood School~~ and the Ventura site~~. PAUSD also maintains an agreement with the City of Palo Alto that allows PAUSD the right to repurchase the Ventura site for educational purposes.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.13-7 last paragraph, third sentence on page 2-164, the following edits are made in response to Comment RO-Goldfarb-8:

> In addition to reactivating existing school sites owned by PAUSD, such as Cubberley, Greendell and Garfield, the PAUSD also has several school properties currently leased to private school providers, such as Athena Academy, and Pinewood School ~~and the Ventura site~~. PAUSD also maintains an agreement with the City of Palo Alto that allows PAUSD the right to repurchase the Ventura site for educational purposes.

Recirculated Portions of Draft EIR Section 7.4.4, Additional Housing Alternative A – Transportation and Traffic

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, pages 2-176 to 2-177, a number of revisions are made to Mitigation Measure 7A.15-1 as presented below, to correlate with the same revisions made to Mitigation Measure 5.15-1, described above:

> **Mitigation Measure 7A.15-1:** *Construction Traffic Control Measures.* The following traffic control measures are required to address impacts from construction of individual 2018 General Use Permit projects.
>
> - ***Protection and Maintenance of Public Transit Access and Routes***. Stanford and its contractors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, during project construction without prior approval from the VTA and~~or~~ other affected~~appropriate~~ jurisdictions. Such approvals shall require submittal and advance coordination per VTA's Bus Stop Relocation Policy~~approval~~ of a mitigation plan to reduce transit~~specific~~ impacts to a less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing public transit bus stops, limiting access to public transit bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.
>
> - ***Maintenance of Pedestrian Access***. Stanford and its contractors shall be prohibited from substantially limiting pedestrian access to properties or facilities ~~in those affected jurisdictions~~ during construction of the project, without prior approval from ~~those~~ the affected jurisdictions. Such approvals shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting p~~P~~edestrian~~s~~ access ~~limiting actions would~~ include, but are not ~~be~~ limited to, sidewalk closures, bridge closures, crosswalk closures, ~~or~~ pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians ~~during the construction period~~. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided if determined by the County to be needed for pedestrian safety.
>
> - ***Maintenance of Bicycle Access***. Stanford and its contractors shall be prohibited from substantially limiting bicycle access to properties or facilities ~~in those affected jurisdictions while~~ during construction~~g~~ of the project, without prior approval from those jurisdictions. Such approval shall require submittal and approval of specific

construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting b~~B~~icycle access ~~limiting actions would~~ include, but are not ~~be~~ limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists ~~during the construction period~~.

- ***Protection and Maintenance of Emergency Service Access and Routes***. Stanford shall inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and shall designate alternate evacuation and emergency routes ~~shall be designated~~ to maintain response times during construction periods.

- ***Parking for Construction-Related Vehicles***. Stanford shall ~~be required to~~ provide adequate on-campus parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the Stanford campus, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site.

- ***Restriction on Construction Delivery Hours***. Stanford shall make feasible attempts to avoid~~limit the number of~~ construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between ~~the hours of~~ 4:30 PM and 6:00 PM.

- ***Construction Truck Routes***. Stanford shall ~~be required to~~ deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. Heavy construction vehicles shall be prohibited from accessing the site from ~~other~~ routes that the Cities of Palo Alto, Menlo Park, or County of San Mateo have prohibited for use by such vehicles. Stanford shall provide written notification to all contractors regarding appropriate routes to and from construction sites and the weight and speed limits for local roads used to access construction sites. A copy of all such written notifications shall be submitted to the County Planning Office.

- ***Phone Number for Complaints***. Stanford shall post at least one sign no smaller than 1,296 square inches at all active construction sites. The sign shall contain the name, ~~and~~ telephone number and~~or~~ e-mail address of the appropriate Stanford person the public may contact to report alleged violations of this mitigation measure or to register complaints about construction traffic associated with building projects under the 2018 General Use Permit. Stanford shall keep a written record of all such complaints and shall provide copies of these records to the County Planning Office as part of the annual report process.

- ***Construction Impact Mitigation Plan***. In lieu of the above mitigation measures, Stanford may submit a detailed construction impact mitigation plan to the County for review and approval prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. If Stanford determines that it is not feasible to comply with the "Restriction on

Construction Delivery Hours" above, then the plan shall also explain the basis for this infeasibility determination. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved.

- ***Construction During Special Events***. Stanford shall ~~implement a mechanism to~~ prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events~~, which~~ that attract a substantial number of visitors to the campus. This measure may require a special supplemental permit to be obtained to host such events during significant construction phases.

Significance after Mitigation: Less than Significant.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, the following text is added following the last paragraph of Impact 7A.15-2 on page 2-178 to address mitigation for reverse peak direction trips.

Mitigation Measure 7A.15-2(a) addresses peak hour, peak direction project impacts, with fair share mitigation fees triggered if the "no net new commute trips" standard is not achieved, while Mitigation Measure 7A.15-2(b) addresses peak-hour, off-peak (reverse commute) direction impacts, which are not subject to the "no net new commute trips" standard and, therefore, fair share mitigation fees are triggered upon project approval.[40a]

[40a] Fehr and Peers, 2018 Stanford General Use Permit: Reverse-Commute Analysis, Appendix RCA.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, pages 2-178 and 2-185 to 2-193, a number of revisions are made to Mitigation Measure 7A.15-2. This includes a number of County-initiated changes made to clarify the original mitigation measure [revised as Mitigation Measure 7A.15-2(a)], and miscellaneous edits to Table 1A. In addition, a new Mitigation Measure 7A.15-2(b) (including new Table 2A) is added to the mitigation measure to address reverse commute impacts, in response to Comment RA-MP-9. (These revisions correlate with the previously described revisions made to Mitigation Measure 5.15-2, described above.) Revised Mitigation 7A.15-2 is presented in its entirely below:

Mitigation Measure 7A.15-2(a): Stanford shall mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of fair share fees for the ~~funding equivalent to Stanford's proportionate share of the cost of~~ improvements for adversely affected intersections specified in Table 1A [minus the contribution to these improvements provided pursuant to Mitigation Measure 7A.15-2(b), below], which funds shall be expended by the County to fund ~~transportation~~ mitigation efforts.

1. As specified on page 64 and Policy C-1 of the Stanford Community Plan, the no net new commute trips standard is defined as no increase in automobile trips during peak commute times in the peak commute direction, as counted at defined cordon locations around the central campus. The peak commute period is defined as the one-hour period in the morning (AM) and afternoon (PM) ~~of time~~ with the highest volume of traffic at the cordon locations, as determined by ~~the~~ traffic counts.

TABLE 1A
STUDY INTERSECTION MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE A

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alt. A	2035 Cumulative with Additional Housing Alt. A
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	Contribute fair share funding toward the addition of second northbound right-turn lane, as identified in the ConnectMenlo Final Environmental Impact Report.	X	X
13	I-280 SB Off-Ramp / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a traffic signal.	X	
17	Junipero Serra Blvd – Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair-share funding toward grade separation project (County Expressway Plan 2040).	X	X
19	Hanover St / Page Mill Rd – Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a second westbound left-turn lane, identified as an option in the Page Mill Expressway Corridor Study Report.		X
20	El Camino Real / Page Mill Rd - Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two ~~extended~~ left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report. Contribute fair-share funding toward the installation of a southbound right-turn lane and overlap phase.		X
21	Middlefield Rd / Oregon Expy	Santa Clara County (SC CMP)	No feasible mitigation measure.		X
29	Foothill Expy / Hillview Ave	Santa Clara County	No feasible mitigation measure.		X
30	Foothill Expy / Arastradero Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward a grade separation improvement project, as identified in the draft Santa Clara County Expressway Plan 2040. The grade separation assumes inclusion of a separated through-way for vehicles on Foothill Expressway.	X	X
31	Foothill Expy / San Antonio Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the addition of a third southbound through lane on Foothill Expressway between San Antonio Road and El Monte Avenue as identified in the draft Santa Clara County Expressway Plan 2040.		X
32	Foothill Expy / El Monte Ave	Santa Clara County (SC CMP)	Contribute fair share funding toward the addition of a third northbound through lane and associated receiving lane that extends to San Antonio Avenue, as identified in the draft Santa Clara County Expressway Plan 2040.		X

TABLE 1A (CONTINUED)
STUDY INTERSECTION MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE A

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alt. A	2035 Cumulative with Additional Housing Alt. A
33	Foothill Expy / Springer Road - Magdalena Ave	Santa Clara County (SC CMP)	Contribute fair share funding toward the following improvements, as identified as a Tier 2 improvement in the draft Santa Clara County Expressway Plan 2040: • Convert the signal to provide 8-phase phasing; • Change the lane configuration for the east leg to have two left-turn lanes, one through lane, and one right-turn lane; and • Change the configuration for the west leg to have one left-turn lane, two through lanes, and one right-turn lane.		X
34	Bowdoin Street / Stanford Avenue	Palo Alto	Contribute fair-share funding toward the installation of a signal.		X
37	El Camino Real / Encinal Ave	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
38	El Camino Real / Valparaiso Ave	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
41	El Camino Real / Ravenswood Rd	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane. Contribute fair-share funding toward widening Menlo Avenue for an exclusive left-turn lane.		X
48	El Camino Real / Embarcadero Rd	Palo Alto (SC CMP)	Contribute fair share funding toward the addition of a second northbound left-turn lane.		X
56	Alma St / Hamilton Ave	Palo Alto	Contribute fair share funding toward the reconfiguration of the westbound approach to have one left-turn lane and one right-turn lane, by removing a portion of the parking.		X
58	Alma St / Charleston Rd	Palo Alto	Contribute fair share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.	X	X
59	Middlefield Rd / Marsh Rd	Atherton	Contribute fair share funding toward the addition of a second westbound left-turn lane and second receiving lane on the south leg.		X
63	Middlefield Rd / Lytton Ave	Palo Alto	No feasible mitigation measure.		X
66	Middlefield Rd / Embarcadero Rd	Palo Alto	No feasible mitigation measure.		X
69	Middlefield Road / Charleston Road	Palo Alto	Contribute fair-share funding to the addition of a designated eastbound right-turn lane with an overlap signal phase		X

TABLE 1A (CONTINUED)
STUDY INTERSECTION MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE A

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alternative A	2035 Cumulative with Additional Housing Alternative A
89	Central Expy / Moffett Blvd	Santa Clara County (SC CMP) ~~Mountain View~~	The City of Mountain View's planned closure of Castro Street at the train tracks to form a T-intersection of Central Expressway and Moffett Boulevard would mitigate Additional Housing Alternative A's impact (Mountain View Transit Center Master Plan). If the Castro Street closure project is not implemented, the secondary, back-up mitigation is to contribute fair-share funding toward the construction of a second southbound left turn lane from Central Expressway to Moffett Boulevard. Stanford shall contribute its fair share funding toward the second southbound left-turn lane from Central Expressway to Moffet Boulevard. The funding can be used for the Castro Street Closure project.		X
90	Foothill Expressway / Edith Avenue	Santa Clara County (SC CMP)	No feasible mitigation measure.		X

2. The reasonable cost of all traffic counts and other work conducted for determination of compliance with this mitigation measure shall be paid for by Stanford. The counts shall be performed by an independent consultant under the direction of the County Planning Office or provided to the County Planning Office through another County-approved methodology.

3. The baseline for measuring the no net new commute trips standard shall be the count that was established in 2001. However, during implementation of the 2018 General Use Permit, the County may modify, or approve Stanford-proposed modifications to ~~Stanford may propose to change~~ the monitoring methodology on new technology such as automation~~, subject to review and approval by the County Planning Office and in accordance with County requirements~~, so long as the basic principles underlying the no net new commute trips standard are still met. If the monitoring methodology is updated, testing and calibration of the new methodology or equipment will require coordination with the County. The County may adjust the 2001 baseline ~~data will be adjusted~~ as needed to reflect any such calibration. Monitoring counts shall be performed each year using the County-approved methodology.

4. Traffic counts and determination of traffic volumes shall occur as described below, unless modifications are approved by the County Planning Office.

    a. Peak-hour traffic for a single year shall be determined through counts taken at two times during the year. All counts shall be conducted during the regular academic year, which does not include academic breaks or end-of-quarter finals. Homecoming or other irregular traffic patterns should be avoided. Specific dates for each count shall be determined by the County Planning Office. The two annual counts shall be averaged to determine the annual traffic level for each monitoring year.

        i. During monitoring periods~~the AM peak hour and the PM peak hour~~, the total amount of traffic crossing the cordon line will be counted by travel direction. The cordon count monitoring will be conducted on a 24-hour basis~~from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM~~. The morning (AM) and afternoon (PM) peak hours within the 24~~two~~-hour count period will be calculated based on total volumes to determine the campus-wide peak hours.

        ii. All counts shall be taken at the campus entry and exit points shown in Figure 5.15-2, which together form the defined cordon line. Additional cordon gateways may be added or the location of the cordon line may be modified as determined by the County.

            a) Traffic counts shall include a methodology to determine the rate of cut-through traffic.

                1) ~~All vehicles will need to be identified in order that cut-through trips can be removed from the total volume.~~ Cut-~~T~~through trips will be identified through license plates on each vehicle or other means. Entry and exit t~~T~~imes will be noted ~~in order~~ to determine when a vehicle crosses the cordon in either direction.

                2) Matching license plates will be determined by comparing numbers that crossed both an entering and exiting cordon within a defined

period (i.e.~~e.g.~~, 20 minutes or as updated), or through other means. Vehicles that enter and exit the cordon within the time period will be cut-through trips across the campus without a campus-related purpose. If data are available or it is feasible to measure, the County will include in the cordon counts all rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs.

b) Cordon volumes will be adjusted to account for use of parking lots within the cordon line by hospital-related traffic and use of lots outside the cordon line by campus-related traffic. Parking areas change due to the evolving needs of campus and hospital operations. The lots used for hospital and university parking shall be confirmed prior to annual surveys. The County reserves the right to change the methodology related to hospital parking or other parking factors in response to changing conditions.

    1) Hospital trips will be subtracted from the count and campus trips will be added to the count. The count adjustment will also ~~need to~~ factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hours, data will need to be collected from each lot. If campus parking occurs in lots outside the cordon, trips associated with those vehicles will be added back into the count. If hospital parking occurs inside the cordon, trips associated with those vehicles will be subtracted from the count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots, unless the County approves an alternate protocol for assigning such parking.

c) Based on the 24-hour counts, the AM and PM ~~a~~ peak hours will be identified for the campus. Peak hour traffic volume will be determined for the campus based on the count, adjusted for cut-through traffic and hospital parking as described above.

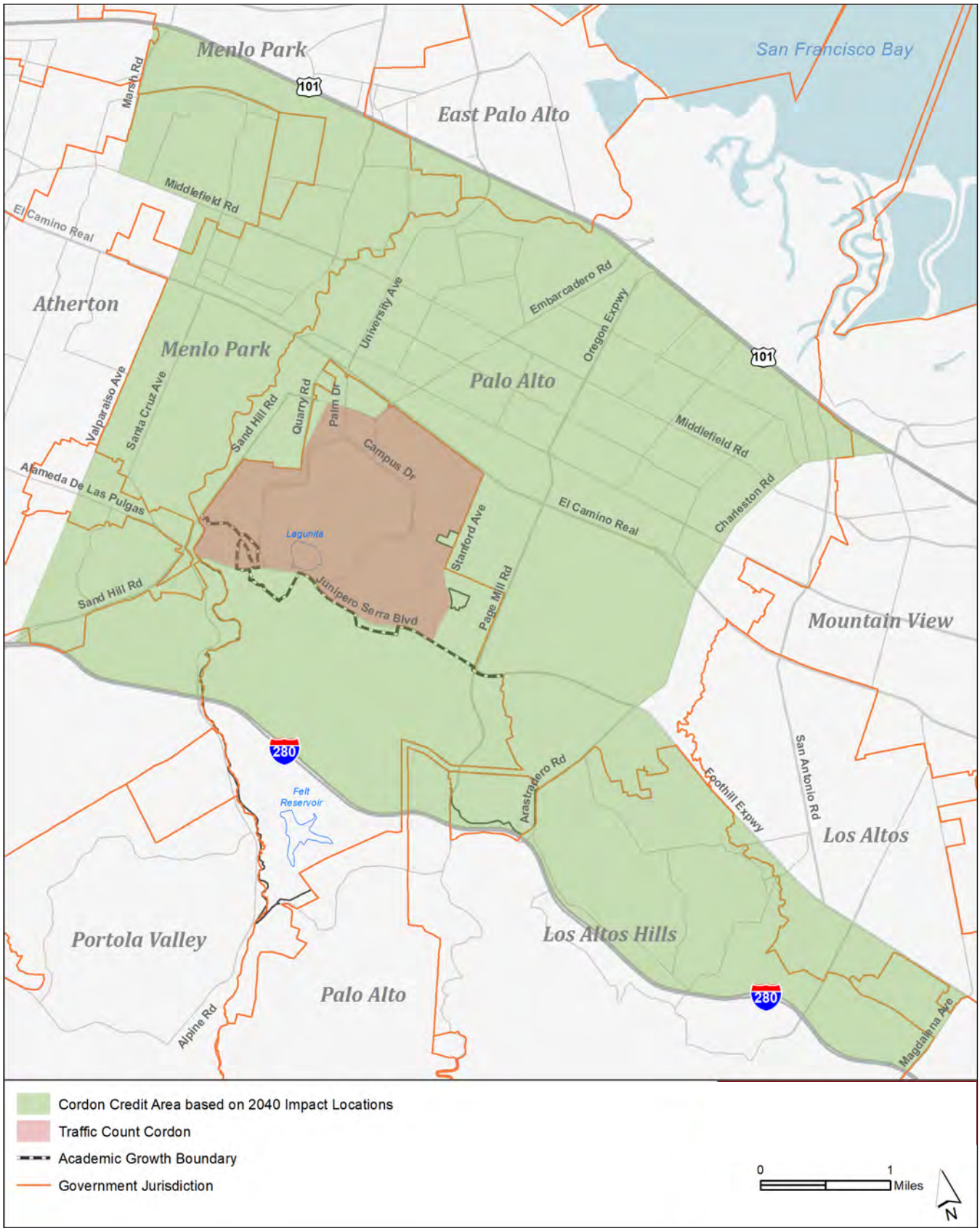
    1) Total entering and exiting traffic will be summed for the 16 campus gateways. A single AM and PM peak hour will be determined for the entire campus based on the ~~traffic volumes~~peak inbound traffic in the AM period and the peak outbound traffic in the PM period. The percent of cut-through trips calculated by the license plate matching (or other technology) described above will be removed. With the exception of rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs, ~~T~~the cut-through vehicles will be removed from both the inbound and the outbound traffic since they will have been observed crossing both an entering and exiting cordon boundary. Finally, the entering and exiting traffic for hospital uses inside the cordon boundary and the campus uses outside the cordon boundary calculated as described above will be subtracted from or added to the counts.

5. As specified by Community Plan Policy C-8, the County Planning Office will recognize participation by Stanford in off-campus trip reduction efforts and credit those reduced trips towards Stanford's attainment of the no net new commute trips standard. Stanford shall receive credit commensurate with the actual number of trips reduced outside the cordon due to Stanford's direct efforts, ~~and~~or the proportion of the cost of the program ~~that~~to which Stanford is contributing. A reduction of an off-campus trip ~~can~~may be recognized as long as at least one terminus for the trip is within the area shown on **Figure 7A.15-1**. The County Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate. Such proposals shall be submitted by Stanford to the County Planning Office for review, modification and ~~consideration of~~potential approval. The proposals shall be presented to the Community Resource Group prior to any determination by the County Planning Office. Once the County Planning Office has accepted the proposal and the program implementation begins, the County Planning Office will identify, at Stanford's cost, the number of trips reduced outside the cordon and ~~factor a~~ calculate~~ion of the~~ a trip reduction credit ~~into its~~ for application toward attainment of ~~Stanford's annual compliance with~~ the no net new commute trips standard, with the continuing requirement that Stanford provide evidence of its participation in the ongoing program in a manner that can be independently verified. The County reserves the right to further regulate Project-generated trips and the use of trip credits through the Conditions of Approval for the General Use Permit.

   Funding of off-campus circulation infrastructure improvements may also ~~will~~ qualify for trip credits if ~~as long as~~ the improvements will enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area, and thereby remove vehicular trips from the local impact area. For example, funding roadway widening or modifications to add transit vehicle or bicycle lanes or to add signals to improve pedestrian or bicycle safety could qualify for trip credits under this approach if approved by the County. Any proposal for such credits shall be accompanied by substantial evidence demonstrating that~~how~~ the infrastructure project would remove vehicular trips from the local impact area. Once the County Planning Office has approved infrastructure improvement project for a trip reduction credit, the project has been implemented, and the trip reductions have been verified, the trip reduction credit will be factored into the County's conclusion regarding Stanford's annual compliance with the no net new commute trips standard in each subsequent year.

   Each year, the County will report Stanford's trip credits in its annual monitoring report. The County will track and calculate trip reduction credits in a manner designed to ensure that credits benefit the three geographic sub-areas surrounding the Stanford campus (north, east, and south/southwest) in rough proportion to the 2018 General Use Permit trip assignment forecasted in the Draft EIR. Trip reduction credits with area-wide benefit will be tracked separately from trip reduction credits with sub-area geographic benefits.

6. The County Planning Office shall monitor the cordon counts using the procedures described above. If the cordon counts, as modified by trip reduction credits, exceed the baseline volume by 1% or more for any two out of three consecutive years, mitigation of impacts to intersections in the form of fair share payments will be required, implementing Stanford Community Plan Implementation Recommendation C(i)(9). Table 1 identifies the intersection impacts that could occur if the no net new commute trips standard is not achieved, and the physical improvements that would substantially reduce each impact.



SOURCE: Stanford LBRE LUEP

Stanford 2018 General Use Permit . 160531

Figure 7A.15-1
Revised Cordon Credit Area

~~a. Prior to the first year of cordon count monitoring under the 2018 General Use Permit, the County Planning Office will: 1) determine, in consultation with the affected jurisdictions, the cost of the intersection improvements identified in Table 1; 2) identify Stanford's fair share contributions to those improvements based on Stanford's proportionate contribution to the impact from development under the 2018 General Use Permit as compared to the contributions to the impact from background and cumulative traffic at the intersections; and 3) establish a cost-per-trip fee. This fee shall be increased annually to reflect changes in California construction costs (e.g., by applying the relevant Saylor or RS Means construction cost index).~~

~~i.~~ Upon the County's ~~its~~ determination that the no net new commute trips standard has been exceeded by 1% or more in two out of three consecutive years, the County will require Stanford to ~~pay~~make its fair share ~~the cost-per-trip fee for each peak hour trip that exceeded the established no net new commute trips standard during the applicable two to three-year time period.~~

~~ii. To calculate the annual cost-per-trip fee, the total amount of Stanford's fair share contribution to all intersection improvements will be divided by 17, to reflect the number of years that the 2018 General Use Permit is expected to be in effect. The resulting quotient will then be divided by the total number of peak hour, peak direction vehicle trips anticipated in the EIR to occur absent the no net new commute trips standard.~~

~~iii. The annual cost-per-trip fee times the number of trips exceeding the no net new commute trips standard in each of the applicable years (i.e., calculated over two years if the goal is exceeded two out of three years) will constitute the trip payment that Stanford must provide to the County.~~

~~iv. In no event would Stanford be required to pay cumulatively over the time period of the 2018 General Use Permit more than the total amount of its fair share~~ contribution toward improvements at adversely affected intersections and roadways based on all exceedances of the "no net new commute trips" standards.

~~b.~~ The County Planning Office will use the intersection improvement ~~trip~~ fees collected from Stanford as follows:

a. The fees shall be used to fund the intersection improvements identified in Table 1A. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the fees are used to fund an intersection improvement in another jurisdiction, the County will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.

b. Substitute Mitigation:

~~i. The County Planning Office may elect~~ If the County Planning Office determines that it is not feasible to use the fees for the specified intersection improvements (e.g., it does not appear that there will be full funding for the improvements within a reasonable time; the public agencies with authority or jurisdiction over the improvement projects will not approve the projects),

then the fees may be used to fund off-campus projects that encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area, including but not limited to transit improvements that would directly or indirectly ~~would~~ benefit the local impact area. This fund also could be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users provided there is substantial evidence demonstrating how the improvements would remove vehicular trips from the local impact area.

~~ii. The County Planning Office may elect to fund one or more of the intersection improvements identified in Table 1. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the County elects to fund an intersection improvement in another jurisdiction, it will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.~~

Mitigation Measure 7A.15-2(b): Stanford shall mitigate the transportation impacts of its additional development and population growth with respect to reverse-commute impacts through the contribution of fair share fees for the cost of improvements for adversely affected intersections specified in Table 2A (a subset of the adversely affected intersections specified in Table 1A), which funds shall be expended by the County to fund transportation mitigation efforts in the same manner as provided in Mitigation Measure 7A.15-2(a)(6)(a) and (b).

Significance after Mitigation: Significant and Unavoidable.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, to correlate with the previously described revisions to Mitigation Measure 7A.15-2, Table 7A.15-6 on page 2-197, references to mitigation are revised as MM 7A.15-2(a) (see following table). Please note also that the original references to the mitigation in this Table 7A.15-6 were mislabeled as MM 5.15-2, instead of MM 7A.15-2.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, to correlate with the previously described revisions to Mitigation Measure 7A.15-2, on page 2-198, under Impact 7A.15-3, last paragraph, third sentence, Mitigation Measure 7A.15-2 is revised as Mitigation Measure 7A.15-2(a), as follows:

Mitigation Measure 7A.15-2(a) would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fair share fees paid by Stanford from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips.

TABLE 2A
STUDY INTERSECTION REVERSE-COMMUTE MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE A

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alt. A	2035 Cumulative with Additional Housing Alt. A	Fair Share Contribution[a]
13	I-280 SB Off-Ramp / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a traffic signal.	X		22.8%
17	Junipero Serra Blvd – Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair-share funding toward a second southbound left-turn lane	X	X	20.0%
19	Hanover St / Page Mill Rd – Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a second westbound left-turn lane, identified as an option in the Page Mill Expressway Corridor Study Report.		X	16.9%
20	El Camino Real / Page Mill Rd - Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two extended left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report.		X	13.9%
29	Foothill Expy / Hillview Ave	Santa Clara County	No feasible mitigation measure.		X	3.4%
41	El Camino Real / Ravenswood Rd	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X	5.8%
48	El Camino Real / Embarcadero Rd	Palo Alto (SC CMP)	Contribute fair share funding toward the addition of a second northbound and southbound left-turn lane.		X	19.3%
56	Alma St / Hamilton Ave	Palo Alto	Contribute fair share funding toward the reconfiguration of the westbound approach to have one left-turn lane and one right-turn lane, by removing a portion of the parking.		X	3.3%
58	Alma St / Charleston Rd	Palo Alto	Contribute fair share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.	X	X	2.5%

NOTE:

[a] The fair-share contribution is estimated based on the total number of proposed Additional Housing Alternative A reverse-commute direction trips at the intersection divided by the difference between the total cumulative intersection volume and the existing intersection volume. The value presented in this table represents the maximum percentage of the AM and PM peak hours if both peak hours are impacted; the AM percentage if only the AM peak hour is impacted, and the PM percentage if only the PM peak hour is impacted. Additional calculations are provided in Appendix RCA. It should be noted that these percentages are projected based on Baseline and Cumulative projects known at this time, and are subject to change if new projects (i.e., projects not included in Baseline and/or Cumulative analysis scenarios) that would add volumes to the study intersections are approved prior to issuance of the first building permit authorized under the 2018 General Use Permit.

TABLE 7A.15-6
2018 BASELINE WITH ADDITIONAL HOUSING ALTERNATIVE A INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2018 Baseline		2018 Baseline With Additional Housing Alternative A		Mitigation Measure	2018 Baseline With Additional Housing Alternative A (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**119.6** 21.2	**F** C+	**136.9** 22.1	**F** C+	See MM 7A~~5~~.15-2(a) (Table 1A)	45.3 17.9	D B	LTS/SU
13	I-280 SB Ramps / Page Mill Road	Santa Clara County	LOS E (Warrant)	AM PM	**151.7** **85.9**	**F** **F**	**154.0** **89.2**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	37.2 42.3	D+ D	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**97.2** **97.0**	**F** **F**	**110.6** **113.0**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	70.3 59.2	E E+	LTS/SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	71.8 **92.3**	E **F**	73.8 **95.1**	E **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	60.3 67.9	E E	LTS/SU
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	**55.2** 55.0	**E+** D-	**56.3** **56.5**	**E+** **E+**	See MM 7A~~5~~.15-2(a) (Table 1A)	55.2 **55.4**	**E+** **E+**	SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.
[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.
[c] AM = morning peak traffic hour, PM = evening peak traffic hour.
[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.
[f] LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection;
SU = significant and unavoidable.

SOURCE: Fehr & Peers, April 2018 (see Appendix ALT-TIA)

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.15-9, Table 7A.15-11, page 2-210; a staff initiated change is made to correct an error in level of service and delay at one study intersection (Intersection 23: I-280 SB Ramps / Alpine Road).

(Note that since only the second page in this table requires revision, for efficiency, only the second page of Table 7A.15-11 is presented below.)

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-216, the mitigation measure for Impact 7A.15-9 is revised to correlate with the previously described revisions to Mitigation Measure 7A.15-2, as follows:

> **Mitigation Measure:** Implement Mitigation Measure 7A.15-2(a)-(b).

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 2-216, the second to last paragraph is revised to address mitigation for reverse commute impacts, in response to Comment RA-MP-9, and contains County-initiated changes, as follows:

> As detailed in Mitigation Measure 7A.15-2(a), Stanford shall mitigate the peak hour, peak direction transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of funding equivalent to Stanford's fair ~~proportionate~~ share of the cost of improvements for adversely affected intersections, which funds shall be expended by the County to fund transportation mitigation efforts. Further, Mitigation Measure 7A.15-2(b) requires that Stanford mitigate the peak-hour, off-peak direction (reverse commute) transportation impacts of its additional development and population growth through the contribution of funding equivalent to Stanford's fair share of the cost of improvements for adversely affected intersections, which funds shall be expended by the County to fund transportation mitigation efforts.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, page 7A.15-217, first paragraph, second sentence, reference to Mitigation Measure 7A.15-2 is revised as Mitigation Measure 7A.15-2(a), to correlate with the previously described revisions to Mitigation Measure 7A.15-2 as follows:

> As discussed in further detail below, many of the intersections adversely affected under 2035 Cumulative with Additional Housing Alternative A conditions identified in Table 1A in Mitigation Measure 7A.15-2(a) are located in other jurisdictions, and consequently, the improvements depend on the actions of those jurisdictions.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, to correlate with the previously described revisions to Mitigation Measure 7A.15-2, Table 7A.15-13 on pages 2-230 and 2-231, references to mitigation are revised as MM 7A.15-2(a) (see following table). Please note also that the original references to the mitigation in Table 7A.15-13 were mislabeled as MM 5.15-2, instead of MM 7A.15-2.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, the second page of Table 7A.15-13 on page 2-231 was mislabeled as Table 5.15-13, and is corrected in the revised table (see following table).

TABLE 7A.15-11 (CONTINUED)
CUMULATIVE (2035) NO PROJECT AND WITH ADDITIONAL HOUSING ALTERNATIVE A INTERSECTION LEVELS OF SERVICE

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative[d]		2035 Cumulative With Proposed Project[d]				2035 Cumulative With Additional Housing Alternative A			
					Delay[e]	LOS[f]	Delay[e]	LOS[f]	Δ in Crit. V/C[g]	Δ in Crit. Delay[h]	Delay[e]	LOS[f]	Δ in Crit. V/C[g]	Δ in Crit. Delay[h]
18	Peter Coutts / Page Mill Rd	Santa Clara County	LOS E	AM PM	22.3 30.5	C+ C	22.9 30.8	C+ C	0.020 0.015	0.8 0.0	23.7 31.7	C C	0.035 0.030	1.7 0.9
19	Hanover St / Page Mill Rd	Santa Clara County (SC CMP)	LOS E	AM PM	**85.6** 51.9	**F** D-	**92.1** 52.8	**F** D-	**0.025** 0.018	**11.2** 0.6	**96.0** 62.4	**F** E	**0.053** 0.134	**17.8** 14.1
20	El Camino Real / Page Mill Rd - Oregon Expy	Santa Clara County (SC CMP)	LOS E	AM PM	75.1 **83.1**	E- **F**	**84.9** **90.2**	**F** **F**	**0.047** **0.035**	**13.2** **11.0**	**91.6** **98.5**	**F** **F**	**0.105** **0.080**	**38.3** **26.1**
21	Middlefield Rd / Oregon Expy	Santa Clara County (SC CMP)	LOS E	AM PM	**122.7** **101.5**	**F** **F**	**125.6** **103.6**	**F** **F**	**0.014** **0.012**	**4.7** **3.1**	**125.5** **103.2**	**F** **F**	**0.016** **0.018**	**4.3** **2.1**
22	Oregon Expy / West Bayshore Rd	Santa Clara County	LOS E	AM PM	23.4 20.8	C C+	23.4 21.0	C C+	0.003 0.008	0.0 0.1	23.5 21.2	C C+	0.012 0.017	0.1 0.6
23	I-280 SB Ramps / Alpine Rd*	San Mateo County	LOS E (warrant)	AM PM	10.5 2.1	E C	42.7 16.9	E C	N/A	N/A	~~10.5~~ 47.4 ~~2.1~~ 16.8	E C	N/A	N/A
24	I-280 NB Ramps / Alpine Rd*	San Mateo County	LOS E (warrant)	AM PM	26.7 29.1	D D	27.8 32.5	D D	N/A	N/A	28.3 32.6	D D	N/A	N/A
25	Junipero Serra Blvd / Alpine Rd	Menlo Park	LOS D	AM PM	48.1 50.6	D D	51.6 52.8	D- D-	0.049 0.029	4.6 1.7	51.6 52.8	D- D-	0.046 0.030	4.3 1.7
26	Junipero Serra Blvd / Campus Drive West	Santa Clara County	LOS E	AM PM	30.1 44.1	C D	32.5 50.3	C- D	0.009 0.043	1.5 8.6	34.5 49.9	C- D	0.041 0.037	6.7 6.7
27	Junipero Serra Blvd / Campus Drive East	Santa Clara County	LOS E	AM PM	14 17.8	B B	14.4 19.5	B B-	0.020 0.037	0.7 2.8	14.7 19.6	B B-	0.041 0.051	1.2 2.5
28	Junipero Serra Blvd / Stanford Ave	Santa Clara County	LOS E	AM PM	20.6 24.9	C+ C	22.4 29.9	C+ C	0.061 0.084	2.5 6.8	24.4 32.3	C C-	0.095 0.111	5.1 9.4
29	Foothill Expy / Hillview Ave	Santa Clara County	LOS E	AM PM	**124.6** 58.3	**F** E+	**135.0** 64.2	**F** E	**0.024** 0.015	**16.1** 9.0	**132.1** 63.3	**F** E	**0.036** 0.013	**11.2** 7.7
30	Foothill Expy / Arastradero Rd	Santa Clara County (SC CMP)	LOS E	AM PM	**194.5** **202.5**	**F** **F**	**201.2** **208.9**	**F** **F**	**0.016** **0.095**	**10.4** **18.2**	**200.5** **207.9**	**F** **F**	**0.015** **0.092**	**9.3** **15.9**
31	Foothill Expy / San Antonio Rd	Santa Clara County (SC CMP)	LOS E	AM PM	38.8 **165.8**	D+ **F**	43.2 **171.0**	D **F**	0.016 **0.021**	6.7 **8.1**	42.0 **169.7**	D **F**	0.012 **0.017**	4.9 **6.5**
32	Foothill Expy / El Monte Ave	Santa Clara County (SC CMP)	LOS E	AM PM	**142.6** **133.5**	**F** **F**	**149.3** **137.9**	**F** **F**	**0.014** 0.004	**13.5** 1.9	**147.6** **136.9**	**F** **F**	**0.011** 0.003	**10.3** 1.0
33	Foothill Expy / Springer Road-Magdalena Ave	Santa Clara County (SC CMP)	LOS E	AM PM	**128.7** **151.5**	**F** **F**	**131.9** **154.4**	**F** **F**	**0.014** **0.010**	**4.8** **5.1**	**131.6** **154.7**	**F** **F**	**0.011** **0.009**	**4.3** **5.5**
34	Bowdoin St / Stanford Ave*	Palo Alto	LOS E (warrant)	AM PM	16.7 25.8	C D	22.8 43.2	C E	N/A	N/A	25.7 **55.4**	D **F**	N/A	N/A

TABLE 7A.15-13
2035 CUMULATIVE WITH ADDITIONAL HOUSING ALTERNATIVE A INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Additional Housing Alt. A		Mitigation Measure	2035 Cumulative With Additional Housing Alt. A (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**136.9** 18.4	**F** B-	**154.7** 19.4	**F** B-	See MM 7A~~5~~.15-2(a) (Table 1A)	**66.4** 16.3	**E** B	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**180.4** **162.9**	**F** **F**	**196.8** **178.3**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	**116.8** **89.3**	**F** **F**	LTS/SU
19	Hanover Street / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**85.6** 51.9	**F** D-	**96.0** 62.4	**F** E	See MM 7A~~5~~.15-2(a) (Table 1A)	75.0 59.7	E- E+	LTS/SU
20	El Camino Real / Page Mill Road – Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	75.1 **83.1**	E- **F**	**91.6** **98.5**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	68.6 **83.0**	E **F**	LTS/SU
21	Middlefield Road / Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	**122.7** **101.5**	**F** **F**	**125.5** **103.2**	**F** **F**	*N/A (no feasible improvements)*			SU
29	Foothill Expressway / Hillview Avenue	Santa Clara County	LOS E	AM PM	**124.6** 58.3	**F** E+	**132.1** 63.3	**F** E	*N/A (no feasible improvements)*			SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**194.5** **202.5**	**F** **F**	**200.5** **207.9**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	41.9 70.7	D E	LTS/SU
31	Foothill Expressway / San Antonio Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	38.8 **165.8**	D+ **F**	42.0 **169.7**	D **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	42.0 46.3	D D	LTS/SU
32	Foothill Expressway / El Monte Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**142.6** **133.5**	**F** **F**	**147.6** **136.9**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	74.2 **113.0**	E **F**	LTS/SU
33	Foothill Expressway / Springer Road – Magdalena Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**128.7** **151.5**	**F** **F**	**131.6** **154.7**	**F** **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	**122.4** **147.9**	**F** **F**	LTS/SU
34	Bowdoin Street / Stanford Avenue	Palo Alto	LOS D	AM PM	16.7 25.8	C D	25.7 **55.4**	D **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	9.5 17.7	A B	LTS/SU
37	El Camino Real / Encinal Ave	Menlo Park	LOS D	AM PM	44.9 **89.9**	D **F**	45.8 **92.5**	D **F**	See MM 7A~~5~~.15-2(a) (Table 1A)	35.6 **67.0**	D+ **E**	LTS/SU
38	El Camino Real / Valparaiso Ave	Menlo Park	LOS D	AM PM	53.5 **56.0**	D- **E+**	54.0 **57.2**	D- **E+**	See MM 7A~~5~~.15-2(a) (Table 1A)	52.4 52.3	D- D-	LTS/SU

TABLE 7A5.15-13 (CONTINUED)
2035 CUMULATIVE WITH ADDITIONAL HOUSING ALTERNATIVE A INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Additional Housing Alt. A		Mitigation Measure	2035 Cumulative With Additional Housing Alt. A (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
41	El Camino Real / Ravenswood Road	Menlo Park	LOS D	AM PM	48.0 **63.8**	D **E**	48.9 **66.3**	D **E**	See MM 7A5.15-2(a) (Table 1A)	46.7 **59.7**	D **E+**	LTS/SU
48	El Camino Real / Embarcadero Road	Palo Alto (SC CMP)	LOS E	AM PM	56.9 72.1	E+ E	63.0 **90.1**	E **F**	See MM 7A5.15-2(a) (Table 1A)	54.1 78.3	D- E-	LTS/SU
56	Alma Street / Hamilton Avenue	Palo Alto	LOS D	AM PM	10.2 **57.7**	B+ **E+**	10.6 **63.6**	B+ **E**	See MM 7A5.15-2(a) (Table 1A)	10.2 41.2	B+ D	LTS/SU
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	123.4 121.5	**F** **F**	130.0 **129.4**	F **F**	See MM 7A5.15-2(a) (Table 1A)	123.3 **125.7**	F **F**	SU
59	Middlefield Road / Marsh Road	Atherton	LOS D	AM PM	**76.9** **76.0**	**E-** **E-**	**79.7** **77.5**	**E-** E	See MM 7A5.15-2(a) (Table 1A)	41.8 **68.5**	D **E**	LTS/SU
63	Middlefield Road / Lytton Avenue	Palo Alto	LOS D	AM PM	49.2 **66.1**	D **E**	51.0 **70.1**	D **E**	N/A (no feasible improvements)			SU
66	Middlefield Road / Embarcadero Road	Palo Alto	LOS D	AM PM	55.0 **68.1**	D- **E**	**58.8** **72.8**	**E+** **F**	N/A (no feasible improvements)			SU
69	Middlefield Rd / Charleston Rd	Palo Alto	LOS D	AM PM	**58.0** **67.7**	**E+** **E**	**58.5** **69.8**	**E+** **E**	See MM 7A5.15-2(a) (Table 1A)	**56.6** **62.5**	**E+** **E**	LTS/SU
89	Central Expwy / Castro St-Moffett Blvd	Santa Clara Co. (SC CMP)	LOS E	AM PM	**240.1** **222.1**	**F** **F**	**244.2** **226.1**	**F** F	See MM 7A5.15-2(a) (Table 1F)	**91.9** **129.3**	**F** **F**	LTS/SU
90	Foothill Expressway / Edith Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	55.9 **105.5**	E+ **F**	60.0 **111.1**	E+ **F**	N/A (no feasible improvements)			SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.

[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.

[c] AM = morning peak traffic hour, PM = evening peak traffic hour.

[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.

[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.

[f] LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection; SU = significant and unavoidable.

SOURCE: Fehr & Peers, April 2018 (see Appendix ALT-TIA)

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, Impact 7A.15-10, last paragraph, third sentence before Significance after Mitigation on page 2-233, to correlate with the previously described revisions to Mitigation Measure 7A.15-2, the reference to Mitigation Measure 7A.15-2 is revised as Mitigation Measure 7A.15-2(a), as follows:

> Mitigation Measure 7A.15-2(a) would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fees from exceeding the No Net New Commute Trips standard to alternative programs that reduce trips.

The Recirculated Portions of Draft EIR Section 7.4.4 Additional Housing Alternative A, second paragraph under Ability to Meet Project Objectives, page 2-258, in response to Comment RO-SCOPE-5, the following edit is made:

> This alternative also would also not fully achieve the following more specific project objectives to: continue to allow Stanford flexibility to develop its lands within a framework that minimizes potential negative effects on the surrounding community; ~~enable Stanford to meet its needs to accommodate increasing enrollment and balance academic and academic support space growth with student housing growth by authorizing new and expanded student housing units/beds at a growth rate from 2018 through 2035 that is consistent with Stanford's historic annual growth rate for student housing, not including the unique Escondido Village Graduate Student Residences Project;~~ and prioritize use of campus lands within unincorporated Santa Clara County for academic and academic support facilities, student housing, and faculty housing.

Recirculated Portions of Draft EIR Section 7.4.5, Additional Housing Alternative B – Air Quality

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, pages 2-286, the mitigation for Impact 7B.2-8 is revised to reference Mitigation Measure 7B.15-2(a).

> **Mitigation:** Implement the following mitigation measures:
>
> > Mitigation Measure 7B.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*
> >
> > Mitigation Measures 7B.3-8(a)-(b): *Mitigation for native oak woodland.*
> >
> > Mitigation Measure 7B.3-9(a)-(c): *Mitigation for wetlands.*
> >
> > Mitigation Measure 7B.3-11(a)-(c): *Mitigation for protected trees*.

Recirculated Portions of Draft EIR Section 7.4.5, Additional Housing Alternative B – Biological Resources

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, Mitigation Measure 7B.3-9(c) on page 2-298, is revised in response to Comment RA-SCVWD-1:

> **Mitigation Measure 7B.3-9(c):** *Jurisdictional waters or wetland replacement.* If the County Planning Office determines that avoidance of jurisdictional waters or wetlands is not feasible, Stanford shall obtain all appropriate permits or approval for work in jurisdictional waters (i.e., Waters of the State or Waters of the U.S.), from applicable agencies, including but not necessarily limited to, ~~wetland work from~~ the U.S. Army Corps of Engineers, ~~or~~ San Francisco Bay Regional Water Quality Control Board, and California State Department of Fish and Wildlife. ~~As specified by the Corps or Regional Water Quality Control Board, a~~Any jurisdictional waters or wetlands that are filled as a result of project development shall be replaced through the creation, preservation or restoration of jurisdictional waters or wetlands or through other measures that the agencies deem appropriate through permit requirements to adequately mitigate the impact. Potential measures may include the following:
>
> - For creek projects, remove hardscape features from the stream channel and stream banks.
> - Stabilize exposed slopes or streambanks immediately upon completion of construction activities.
> - To restore disturbed aquatic sites, a wetland mitigation and monitoring plan will be prepared that outlines the objectives to mitigate for construction impacts. At a minimum the plan will include thresholds of replanting success (e.g., 90 percent plant survival after one year, 80 percent second year, and 70 percent third year), monitoring requirements (e.g., at least once each year to confirm site stability, plant viability, and to schedule weeding, as needed), and shall specify resource agency reporting requirements.

Recirculated Portions of Draft EIR Section 7.4.5, Additional Housing Alternative B – Greenhouse Gas Emissions

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, page 2-328, the mitigation for Impact 7B.7-2 is revised to reference Mitigation Measure 7B.15-2(a).

> **Mitigation:** Implement the following mitigation measures:
>
> Mitigation Measure 7B.15-2(a): *Mitigation either through a program of "no net new commute trips" or through the contribution of ~~funding equivalent to Stanford's~~ fair ~~proportionate~~ share fees for ~~of~~ the cost of improvements to fund transportation mitigation efforts.*
>
> Mitigation Measures 7A.3-8(a)-(b): *Mitigation for native oak woodland.*
>
> Mitigation Measure 7A.3-9(a)-(c): *Mitigation for wetlands.*
>
> Mitigation Measure 7A.3-11(a)-(c): *Mitigation for protected trees.*

Recirculated Portions of Draft EIR Section 7.4.5, Additional Housing Alternative B – Hydrology and Water Quality

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, Impact 7B.9-8 second paragraph on page 2-343, in response to Comment A-SCVWD-10, the supporting impact discussion is revised as follows:

> As with the proposed Project, construction and operation of the proposed development under this alternative, together with past, present and other reasonably foreseeable future projects in the vicinity could cumulatively decrease groundwater supplies and interfere with groundwater recharge. As discussed in Section 5.9, Hydrology and Water Quality, the Santa Clara Valley Groundwater Basin is not currently in an overdraft condition and is actively managed by the SCVWD. The SCVWD is designated by the DWR as the exclusive Groundwater Sustainability Agency (GSA) for the Santa Clara Subbasin, which comprises a portion of the larger Santa Clara Valley Basin. ~~which has recently submitted an application to serve as the Groundwater Sustainability Agency (GSA) for the basin in accordance with the Groundwater Sustainability Management Act.~~ A GSA is responsible for developing and implementing a groundwater sustainability plan (GSP) to meet the sustainability goal of the basin to ensure that it is operated within its sustainable yield, without causing undesirable results. A GSA must submit and implement a GSP or prescribed alternative under the Sustainable Groundwater Management Act of 2014. The SCVWD submitted the 2016 Groundwater Management Plan for the Santa Clara and Llagas Subbasins to DWR as an Alternative to a GSP in December 2016. Under this alternative, Stanford would also continue implementation of the Campus-wide Plan for Groundwater Recharge, as specified in Mitigation Measure 7B.9-4, above, to ensure that any loss of recharge areas due to new development under this alternative is addressed through management of Lagunita reservoir as described above. Therefore, considering the projected use of groundwater for the alternative, the proposed landscaping vegetation, current and future management of the groundwater basin and continued adherence to the groundwater recharge plan as overseen by SCVWD, there would be a less than significant cumulative impact to groundwater levels or supplies under this alternative.

Recirculated Portions of Draft EIR Section 7.4.5, Additional Housing Alternative B – Public Services

Draft EIR Section 7.4.5 Additional Housing Alternative B, Impact 7B.13-1, page 2-361, second paragraph last sentence is edited consistent with similar changes made to Impact 5.13-1 above:

> As under the proposed Project, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for ~~PAFD~~ fire protection/EMS services from the service provider(s)~~PAFD~~ and for communication and emergency dispatch services from the PAPD.

Draft EIR Section 7.4.5 Additional Housing Alternative B, Impact 7A.13-2, page 2-362, third paragraph is edited consistent with similar changes made to Impact 5.13-2 above:

> As with the proposed Project, under this alternative, Stanford would pay the City of Palo Alto [or other qualified fire protection/EMS service provider(s) should Stanford contract with another qualified entity(ies)] a fair share contribution annually for fire protection/EMS services from the service provider(s)~~PAFD~~. The City of Palo Alto and Stanford are currently under a five-year~~in negotiation for a 3-5 year~~ contract for PAFD to provide fire protection and EMS services to Stanford~~, with automatic renewal~~.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, Impact 7B.13-4 third paragraph, second sentence on page 2-365, the following edits are made in response to Comment RO-Goldfarb-8:

> In addition to reactivating existing school sites owned by PAUSD, such as Cubberley, Greendell and Garfield, the PAUSD also has several school properties currently leased to private school providers, such as Athena Academy, and Pinewood School~~ and the Ventura site~~. PAUSD also maintains an agreement with the City of Palo Alto that allows PAUSD the right to repurchase the Ventura site for educational purposes.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, Impact 7B.13-7 second paragraph, third sentence on page 2-368, the following edits are made in response to Comment RO-Goldfarb-8:

> In addition to reactivating existing school sites owned by PAUSD, such as Cubberley, Greendell and Garfield, the PAUSD also has several school properties currently leased to private school providers, such as Athena Academy, and Pinewood School~~ and the Ventura site~~. PAUSD also maintains an agreement with the City of Palo Alto that allows PAUSD the right to repurchase the Ventura site for educational purposes.

Recirculated Portions of Draft EIR Section 7.4.5, Additional Housing Alternative B – Transportation and Traffic

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, pages 2-379 to 2-381, a number of revisions are made to Mitigation Measure 7B.15-1, to correlate with the same revisions made to Mitigation Measure 5.15-1, above:

> **Mitigation Measure 7B.15-1:** *Construction Traffic Control Measures.* The following traffic control measures are required to address impacts from construction of individual 2018 General Use Permit projects.
>
> - ***Protection and Maintenance of Public Transit Access and Routes***. Stanford and its contractors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, during project construction without prior approval from the VTA and~~or~~ other affected~~appropriate~~ jurisdictions. Such approvals shall require submittal and advance coordination per VTA's Bus Stop Relocation Policy~~approval~~ of a mitigation plan to reduce transit~~specific~~ impacts to a

less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing public transit bus stops, limiting access to public transit bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.

- ***Maintenance of Pedestrian Access***. Stanford and its contractors shall be prohibited from substantially limiting pedestrian access to properties or facilities ~~in those affected jurisdictions~~ during construction of the project, without prior approval from ~~those~~ the affected jurisdictions. Such approvals shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting p~~P~~edestrian~~s~~ access ~~limiting actions would~~ include, but are not ~~be~~ limited to, sidewalk closures, bridge closures, crosswalk closures, ~~or~~ pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians ~~during the construction period~~. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided if determined by the County to be needed for pedestrian safety.

- ***Maintenance of Bicycle Access***. Stanford and its contractors shall be prohibited from substantially limiting bicycle access to properties or facilities ~~in those affected jurisdictions while~~ during construction~~g~~ of the project, without prior approval from those jurisdictions. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting b~~B~~icycle access ~~limiting actions would~~ include, but are not ~~be~~ limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists ~~during the construction period~~.

- ***Protection and Maintenance of Emergency Service Access and Routes***. Stanford shall inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and shall designate alternate evacuation and emergency routes ~~shall be designated~~ to maintain response times during construction periods.

- ***Parking for Construction-Related Vehicles***. Stanford shall ~~be required to~~ provide adequate on-campus parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the Stanford campus, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site.

- ***Restriction on Construction Delivery Hours***. Stanford shall make feasible attempts to avoid~~limit the number of~~ construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between ~~the hours of~~ 4:30 PM and 6:00 PM.

- ***Construction Truck Routes***. Stanford shall ~~be required to~~ deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. Heavy construction vehicles shall be prohibited from accessing the site from ~~other~~ routes that the Cities of Palo Alto, Menlo

Park or County of Santa Clara have prohibited for use by such vehicles. Stanford shall provide written notification to all contractors regarding appropriate routes to and from construction sites and the weight and speed limits for local roads used to access construction sites. A copy of all such written notifications shall be submitted to the County Planning Office.

- ***Phone Number for Complaints***. Stanford shall post at least one sign no smaller than 1,296 square inches at all active construction sites. The sign shall contain the name, ~~and~~ telephone number and~~or~~ e-mail address of the appropriate Stanford person the public may contact to report alleged violations of this mitigation measure or to register complaints about construction traffic associated with building projects under the 2018 General Use Permit. Stanford shall keep a written record of all such complaints and shall provide copies of these records to the County Planning Office as part of the annual report process.

- ***Construction Impact Mitigation Plan***. In lieu of the above mitigation measures, Stanford may submit a detailed construction impact mitigation plan to the County for review and approval prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. If Stanford determines that it is not feasible to comply with the "Restriction on Construction Delivery Hours" above, then the plan shall also explain the basis for this infeasibility determination. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved.

- ***Construction During Special Events***. Stanford shall ~~implement a mechanism to~~ prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events~~, which~~ that attract a substantial number of visitors to the campus. This measure may require a special supplemental permit to be obtained to host such events during significant construction phases.

Significance after Mitigation: Less than Significant.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, in response to Comment RA-MP-9 the following text is added following the first paragraph of Impact 7B.15-2 on page 2-388 to address mitigation for reverse peak direction trips.

Mitigation Measure 7B.15-2(a) addresses peak hour, peak direction project impacts, with fair share mitigation fees triggered if the "no net new commute trips" standard is not achieved, while Mitigation Measure 7B.15-2(b) addresses peak-hour, off-peak (reverse commute) direction impacts, which are not subject to the "no net new commute trips" standard and, therefore, fair share mitigation fees are triggered upon project approval.[82a]

[82a] Fehr and Peers, 2018 Stanford General Use Permit: Reverse-Commute Analysis, Appendix RCA.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, pages 2-381 and 2-388 to 2-396, a number of revisions are made to Mitigation Measure 7B.15-2. This includes a number of County-initiated changes made to clarify the original mitigation

measure [revised as Mitigation Measure 7B.15-2(a)], and miscellaneous edits to Table 1B. In addition, a new Mitigation Measure 7B.15-2(b) (including new Table 2B) is added to the mitigation measure to address reverse commute impacts, in response to Comment RA-MP-9. (These revisions also correlate with the previously described revisions made to Mitigation Measure 5.15-2, described above.) Revised Mitigation 7B.15-2 is presented in its entirely below:

> **Mitigation Measure 7B.15-2(a):** Stanford shall mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of fair share fees for the ~~funding equivalent to Stanford's proportionate share of the cost of~~ improvements for adversely affected intersections specified in Table 1B [minus the contribution to these improvements provided pursuant to Mitigation Measure 7B.15-2(b), below], which funds shall be expended by the County to fund ~~transportation~~ mitigation efforts.
>
> 1. As specified on page 64 and Policy C-1 of the Stanford Community Plan, the no net new commute trips standard is defined as no increase in automobile trips during peak commute times in the peak commute direction, as counted at defined cordon locations around the central campus. The peak commute period is defined as the one-hour period in the morning (AM) and afternoon (PM) ~~of time~~ with the highest volume of traffic at the cordon locations, as determined by ~~the~~ traffic counts.
>
> 2. The reasonable cost of all traffic counts and other work conducted for determination of compliance with this mitigation measure shall be paid for by Stanford. The counts shall be performed by an independent consultant under the direction of the County Planning Office or provided to the County Planning Office through another County-approved methodology.
>
> 3. The baseline for measuring the no net new commute trips standard shall be the count that was established in 2001. However, during implementation of the 2018 General Use Permit, the County may modify, or approve Stanford-proposed modifications to ~~Stanford may propose to change~~ the monitoring methodology on new technology such as automation~~, subject to review and approval by the County Planning Office and in accordance with County requirements~~, so long as the basic principles underlying the no net new commute trips standard are still met. If the monitoring methodology is updated, testing and calibration of the new methodology or equipment will require coordination with the County. The County may adjust the 2001 baseline ~~data will be adjusted~~ as needed to reflect any such calibration. Monitoring counts shall be performed each year using the County-approved methodology.
>
> 4. Traffic counts and determination of traffic volumes shall occur as described below, unless modifications are approved by the County Planning Office.
>
>   a. Peak-hour traffic for a single year shall be determined through counts taken at two times during the year. All counts shall be conducted during the regular academic year, which does not include academic breaks or end-of-quarter finals. Homecoming or other irregular traffic patterns should be avoided. Specific dates for each count shall be determined by the County Planning Office. The two annual counts shall be averaged to determine the annual traffic level for each monitoring year.

TABLE 1B
STUDY INTERSECTION MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE B

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alternative B	2035 Cumulative with Additional Housing Alternative B
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	Contribute fair share funding toward the addition of second northbound right-turn lane, as identified in the ConnectMenlo Final Environmental Impact Report.	X	X
13	I-280 SB Off-Ramp / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a traffic signal.	X	
17	Junipero Serra Blvd – Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair-share funding toward the addition of a third westbound through lane on Page Mill Road and a receiving lane on the west leg of the intersection (resulting in three westbound lanes from Junipero Serra Boulevard to approximately Old Page Mill Road); installation of an overlap signal phase for northbound, southbound, and westbound right-turning vehicles; at the signalized intersection of Junipero Serra Boulevard – Foothill Expressway / Page Mill Road and widening of southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane	X	X
19	Hanover St / Page Mill Rd – Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a second westbound left-turn lane, identified as an option in the Page Mill Expressway Corridor Study Report.		X
20	El Camino Real / Page Mill Rd - Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two ~~extended~~ left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report. Contribute fair-share funding toward the installation of a southbound right-turn lane and overlap phase.		X
21	Middlefield Rd / Oregon Expy	Santa Clara County (SC CMP)	No feasible mitigation measure.		X
29	Foothill Expy / Hillview Ave	Santa Clara County	No feasible mitigation measure.		X
30	Foothill Expy / Arastradero Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward a grade separation improvement project, as identified in the draft Santa Clara County Expressway Plan 2040. The grade separation assumes inclusion of a separated through-way for vehicles on Foothill Expressway.	X	X

TABLE 1B (CONTINUED)
STUDY INTERSECTION MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE B

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alternative B	2035 Cumulative with Additional Housing Alternative B
31	Foothill Expy / San Antonio Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the addition of a third southbound through lane on Foothill Expressway between San Antonio Road and El Monte Avenue as identified in the draft Santa Clara County Expressway Plan 2040.		X
32	Foothill Expy / El Monte Ave	Santa Clara County (SC CMP)	Contribute fair share funding toward the addition of a third northbound through lane and associated receiving lane that extends to San Antonio Avenue, as identified in the draft Santa Clara County Expressway Plan 2040.		X
33	Foothill Expy / Springer Road - Magdalena Ave	Santa Clara County (SC CMP)	Contribute fair share funding toward the following improvements, as identified as a Tier 2 improvement in the draft Santa Clara County Expressway Plan 2040: • Convert the signal to provide 8-phase phasing; • Change the lane configuration for the east leg to have two left-turn lanes, one through lane, and one right-turn lane; and • Change the configuration for the west leg to have one left-turn lane, two through lanes, and one right-turn lane.		X
37	El Camino Real / Encinal Ave	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
38	El Camino Real / Valparaiso Ave	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X
41	El Camino Real / Ravenswood Rd	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane. Contribute fair-share funding toward widening Menlo Avenue for an exclusive left-turn lane.		X
48	El Camino Real / Embarcadero Rd	Palo Alto (SC CMP)	Contribute fair share funding toward the addition of a second northbound left-turn lane.		X
56	Alma St / Hamilton Ave	Palo Alto	Contribute fair share funding toward the reconfiguration of the westbound approach to have one left-turn lane and one right-turn lane, by removing a portion of the parking.		X
58	Alma St / Charleston Rd	Palo Alto	Contribute fair share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.	X	X

TABLE 1B (CONTINUED)
STUDY INTERSECTION MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE B

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alternative B	2035 Cumulative with Additional Housing Alternative B
59	Middlefield Rd / Marsh Rd	Atherton	Contribute fair share funding toward the addition of a second westbound left-turn lane and second receiving lane on the south leg.		X
63	Middlefield Rd / Lytton Ave	Palo Alto	No feasible mitigation measure.		X
66	Middlefield Rd / Embarcadero Rd	Palo Alto	No feasible mitigation measure.		X
89	Central Expy / Moffett Blvd	Santa Clara County (SC CMP) ~~Mountain View~~	The City of Mountain View's planned closure of Castro Street at the train tracks to form a T-intersection of Central Expressway and Moffett Boulevard would mitigate Additional Housing Alternative B's impact (Mountain View Transit Center Master Plan). If the Castro Street closure project is not implemented, the secondary, back-up mitigation is to contribute fair-share funding toward the construction of a second southbound left turn lane from Central Expressway to Moffett Boulevard. Stanford shall contribute its fair-share funding toward the second southbound left-turn lane from Central Expressway to Moffett Boulevard. The funding can be used for the Castro Street closure project.		X
90	Foothill Expressway / Edith Avenue	Santa Clara County (SC CMP)	No feasible mitigation measure.		X

i. During monitoring periods~~the AM peak hour and the PM peak hour~~, the total amount of traffic crossing the cordon line will be counted by travel direction. The cordon count monitoring will be conducted on a 24-hour basis~~from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM~~. The morning (AM) and afternoon (PM) peak hours within the 24~~two~~-hour count period will be calculated based on total volumes to determine the campus-wide peak hours.

ii. All counts shall be taken at the campus entry and exit points shown in Figure 5.15-2, which together form the defined cordon line. Additional cordon gateways may be added or the location of the cordon line may be modified as determined by the County.

a) Traffic counts shall include a methodology to determine the rate of cut-through traffic.

1) ~~All vehicles will need to be identified in order that cut-through trips can be removed from the total volume.~~ Cut-~~T~~through trips will be identified through license plates on each vehicle or other means. Entry and exit t~~T~~imes will be noted ~~in order~~ to determine when a vehicle crosses the cordon in either direction.

2) Matching license plates will be determined by comparing numbers that crossed both an entering and exiting cordon within a defined period (i.e.~~e.g.~~, 20 minutes or as updated), or through other means. Vehicles that enter and exit the cordon within the time period will be cut-through trips across the campus without a campus-related purpose. If data are available or it is feasible to measure, the County will include in the cordon counts all rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs.

b) Cordon volumes will be adjusted to account for use of parking lots within the cordon line by hospital-related traffic and use of lots outside the cordon line by campus-related traffic. Parking areas change due to the evolving needs of campus and hospital operations. The lots used for hospital and university parking shall be confirmed prior to annual surveys. The County reserves the right to change the methodology related to hospital parking or other parking factors in response to changing conditions.

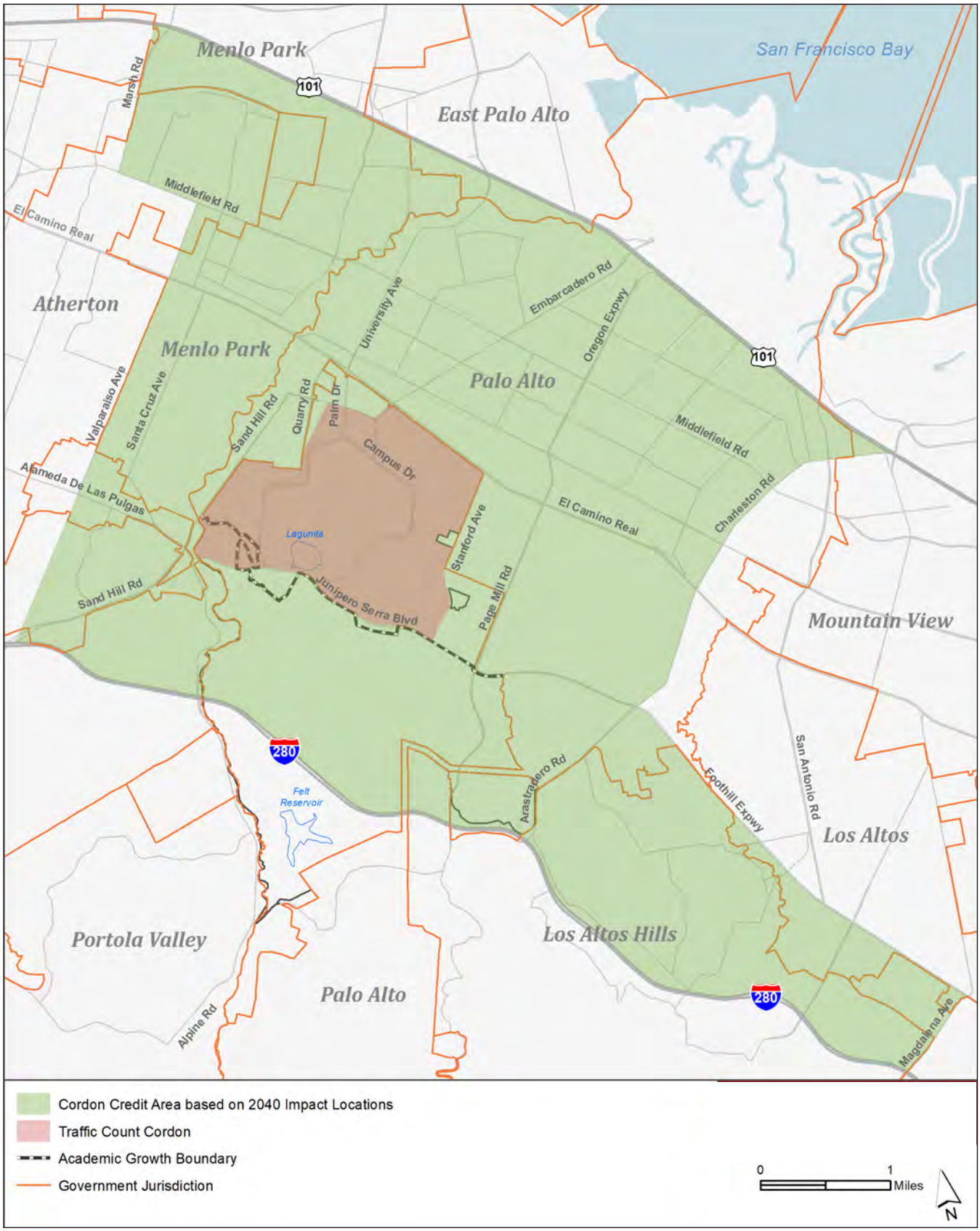
1) Hospital trips will be subtracted from the count and campus trips will be added to the count. The count adjustment will also ~~need to~~ factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hours, data will need to be collected from each lot. If campus parking occurs in lots outside the cordon, trips associated with those vehicles will be added back into the count. If hospital parking occurs inside the cordon, trips associated with those vehicles will be subtracted from the count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots, unless the County approves an alternate protocol for assigning such parking.

c) Based on the 24-hour counts, the AM and PM ~~a~~ peak hours will be identified for the campus. Peak hour traffic volume will be determined for the campus based on the count, adjusted for cut-through traffic and hospital parking as described above.

1) Total entering and exiting traffic will be summed for the 16 campus gateways. A single AM and PM peak hour will be determined for the entire campus based on the ~~traffic volumes~~peak inbound traffic in the AM period and the peak outbound traffic in the PM period. The percent of cut-through trips calculated by the license plate matching (or other technology) described above will be removed. With the exception of rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs, ~~T~~the cut-through vehicles will be removed from both the inbound and the outbound traffic since they will have been observed crossing both an entering and exiting cordon boundary. Finally, the entering and exiting traffic for hospital uses inside the cordon boundary and the campus uses outside the cordon boundary calculated as described above will be subtracted from or added to the counts.

5. As specified by Community Plan Policy C-8, the County Planning Office will recognize participation by Stanford in off-campus trip reduction efforts and credit those reduced trips towards Stanford's attainment of the no net new commute trips standard. Stanford shall receive credit commensurate with the actual number of trips reduced outside the cordon due to Stanford's direct efforts, ~~and~~or the proportion of the cost of the program ~~that~~to which Stanford is contributing. A reduction of an off-campus trip ~~can~~may be recognized as long as at least one terminus for the trip is within the area shown on **Figure 7B.15-1**. The County Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate. Such proposals shall be submitted by Stanford to the County Planning Office for review, modification and ~~consideration of~~potential approval. The proposals shall be presented to the Community Resource Group prior to any determination by the County Planning Office. Once the County Planning Office has accepted the proposal and the program implementation begins, the County Planning Office will identify, at Stanford's cost, the number of trips reduced outside the cordon and ~~factor a~~ calculate~~ion of the~~ a trip reduction credit ~~into its~~ for application toward attainment of ~~Stanford's annual compliance with~~ the no net new commute trips standard, with the continuing requirement that Stanford provide evidence of its participation in the ongoing program in a manner that can be independently verified. The County reserves the right to further regulate Project-generated trips and the use of trip credits through the Conditions of Approval for the General Use Permit.

Funding of off-campus circulation infrastructure improvements may also ~~will~~ qualify for trip credits if ~~as long as~~ the improvements will enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area, and thereby remove vehicular trips from the local impact area. For example, funding roadway widening or modifications to add transit vehicle or bicycle lanes or to add signals to improve pedestrian or bicycle safety could qualify for trip credits under this approach if approved by the County. Any proposal for such credits shall be accompanied by substantial evidence demonstrating that~~how~~ the infrastructure project would remove vehicular trips from the local impact area. Once the County Planning Office has approved infrastructure improvement project for a trip reduction



Stanford 2018 General Use Permit . 160531

SOURCE: Stanford LBRE LUEP

Figure 7B.15-1
Revised Cordon Credit Area

credit, the project has been implemented, and the trip reductions have been verified, the trip reduction credit will be factored into the County's conclusion regarding Stanford's annual compliance with the no net new commute trips standard in each subsequent year.

Each year, the County will report Stanford's trip credits in its annual monitoring report. The County will track and calculate trip reduction credits in a manner designed to ensure that credits benefit the three geographic sub-areas surrounding the Stanford campus (north, east, and south/southwest) in rough proportion to the 2018 General Use Permit trip assignment forecasted in the Draft EIR. Trip reduction credits with area-wide benefit will be tracked separately from trip reduction credits with sub-area geographic benefits.

6. The County Planning Office shall monitor the cordon counts using the procedures described above. If the cordon counts, as modified by trip reduction credits, exceed the baseline volume by 1% or more for any two out of three consecutive years, mitigation of impacts to intersections in the form of fair share payments will be required, implementing Stanford Community Plan Implementation Recommendation C(i)(9). Table 1 identifies the intersection impacts that could occur if the no net new commute trips standard is not achieved, and the physical improvements that would substantially reduce each impact.

   ~~a. Prior to the first year of cordon count monitoring under the 2018 General Use Permit, the County Planning Office will: 1) determine, in consultation with the affected jurisdictions, the cost of the intersection improvements identified in Table 1; 2) identify Stanford's fair share contributions to those improvements based on Stanford's proportionate contribution to the impact from development under the 2018 General Use Permit as compared to the contributions to the impact from background and cumulative traffic at the intersections; and 3) establish a cost-per-trip fee. This fee shall be increased annually to reflect changes in California construction costs (e.g., by applying the relevant Saylor or RS Means construction cost index).~~

      ~~i.~~ Upon the County's ~~its~~ determination that the no net new commute trips standard has been exceeded by 1% or more in two out of three consecutive years, the County will require Stanford to ~~pay~~make its fair share ~~the cost-per-trip fee for each peak hour trip that exceeded the established no net new commute trips standard during the applicable two-to-three-year time period.~~

      ~~ii. To calculate the annual cost-per-trip fee, the total amount of Stanford's fair share contribution to all intersection improvements will be divided by 17, to reflect the number of years that the 2018 General Use Permit is expected to be in effect. The resulting quotient will then be divided by the total number of peak hour, peak direction vehicle trips anticipated in the EIR to occur absent the no net new commute trips standard.~~

      ~~iii. The annual cost-per-trip fee times the number of trips exceeding the no net new commute trips standard in each of the applicable years (i.e., calculated over two years if the goal is exceeded two out of three years) will constitute the trip payment that Stanford must provide to the County.~~

      ~~iv. In no event would Stanford be required to pay cumulatively over the time period of the 2018 General Use Permit more than the total amount of its fair~~

~~share~~ contribution toward improvements at adversely affected intersections and roadways based on all exceedances of the "no net new commute trips" standards.

~~b.~~ The County Planning Office will use the intersection improvement ~~trip~~ fees collected from Stanford as follows:

a. The fees shall be used to fund the intersection improvements identified in Table 1B. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the fees are used to fund an intersection improvement in another jurisdiction, the County will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.

b. Substitute Mitigation:

~~i. The County Planning Office may elect~~ If the County Planning Office determines that it is not feasible to use the fees for the specified intersection improvements (e.g., it does not appear that there will be full funding for the improvements within a reasonable time; the public agencies with authority or jurisdiction over the improvement projects will not approve the projects), then the fees may be used to fund off-campus projects that encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area, including but not limited to transit improvements that would directly or indirectly ~~would~~ benefit the local impact area. This fund also could be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users provided there is substantial evidence demonstrating how the improvements would remove vehicular trips from the local impact area.

~~ii. The County Planning Office may elect to fund one or more of the intersection improvements identified in Table 1. The priority order for funding such intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. If the County elects to fund an intersection improvement in another jurisdiction, it will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.~~

Mitigation Measure 7B.15-2(b): Stanford shall mitigate the transportation impacts of its additional development and population growth with respect to reverse-commute impacts through the contribution of fair share fees for the cost of improvements for adversely affected intersections specified in Table 2B (a subset of the adversely affected intersections specified in Table 1B), which funds shall be expended by the County to fund transportation mitigation efforts in the same manner as provided in Mitigation Measure 7B.15-2(a)(6)(a) and (b).

Significance after Mitigation: Significant and Unavoidable.

TABLE 2B
STUDY INTERSECTION REVERSE-COMMUTE MITIGATION MEASURES UNDER ADDITIONAL HOUSING ALTERNATIVE B

ID No.	Intersection	Jurisdiction/ Congestion Management Program (CMP)	Mitigation Measure	2018 Baseline with Additional Housing Alternative B	2035 Cumulative with Additional Housing Alternative B	Fair Share Contribution[a]
13	I-280 SB Off-Ramp / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair share funding toward the installation of a traffic signal.	X		17.9%
17	Junipero Serra Blvd – Foothill Expy / Page Mill Rd	Santa Clara County (SC CMP)	Contribute fair-share funding toward installation of an overlap signal phase for northbound and southbound right-turning vehicles, and widening of southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane.	X	X	16.0%
20	El Camino Real / Page Mill Rd - Oregon Expressway	Santa Clara County (SC CMP)	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two extended left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report.		X	10.8%
29	Foothill Expy / Hillview Ave	Santa Clara County	No feasible mitigation measure.		X	2.6%
41	El Camino Real / Ravenswood Rd	Menlo Park	Contribute fair share funding toward the conversion of the northbound right-turn lane to a shared through/right-turn lane.		X	5.1%
56	Alma St / Hamilton Ave	Palo Alto	Contribute fair share funding toward the reconfiguration of the westbound approach to have one left-turn lane and one right-turn lane, by removing a portion of the parking.		X	2.4%
58	Alma St / Charleston Rd	Palo Alto	Contribute fair share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.	X		1.8%

NOTE:

[a] The fair-share contribution is estimated based on the total number of proposed Additional Housing Alternative B reverse-commute direction trips at the intersection divided by the difference between the total cumulative intersection volume and the existing intersection volume. The value presented in this table represents the maximum percentage of the AM and PM peak hours if both peak hours are impacted; the AM percentage if only the AM peak hour is impacted, and the PM percentage if only the PM peak hour is impacted. Additional calculations are provided in Appendix RCA. It should be noted that these percentages are projected based on Baseline and Cumulative projects known at this time, and are subject to change if new projects (i.e., projects not included in Baseline and/or Cumulative analysis scenarios) that would add volumes to the study intersections are approved prior to issuance of the first building permit authorized under the 2018 General Use Permit.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, to correlate with the previously described revisions to Mitigation Measure 7B.15-2, on page 2-400, under Impact 7B.15-3, last paragraph, third sentence of, Mitigation Measure 7B.15-2 is revised as Mitigation Measure 7B.15-2(a), as follows:

> Mitigation Measure 7B.15-2(a) would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fees from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, to correlate with the previously described revisions to Mitigation Measure 7B.15-2, Table 7B.15-6 on page 2-401, references to mitigation are revised as MM 7B.15-2(a), in response to Comment RA-MP-9 (see following table). Please note also that the original references to the mitigation in this Table 7B.15-6 were mislabeled as MM 5.15-2, instead of MM 7B.15-2.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, page 2-420, the mitigation measure for Impact 7B.15-9 is clarified to include mitigation for reverse commute impacts, in response to Comment RA-MP-9, as follows:

> **Mitigation Measure:** Implement Mitigation Measure 7B.15-2(a)-(b).

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, to correlate with the previously described revisions to Mitigation Measure 7B.15-2, page 2-420, second paragraph is revised to address mitigation for reverse commute impacts, in response to Comment RA-MP-9, and contains minor County-initiated changes as follows:

> As detailed in Mitigation Measure 7B.15-2a, Stanford shall mitigate the peak hour, peak direction transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of funding equivalent to Stanford's fair ~~proportionate~~ share of the cost of improvements for adversely affected intersections, which funds shall be expended by the County to fund transportation mitigation efforts. Further, Mitigation Measure 7B.15-2(b) requires that Stanford mitigate the peak-hour, off-peak (reverse commute) transportation impacts of its additional development and population growth through the contribution of funding equivalent to Stanford's fair share of the cost of improvements for adversely affected intersections, which funds shall be expended by the County to fund transportation mitigation efforts.

TABLE 7B.15-6
2018 BASELINE WITH ADDITIONAL HOUSING ALTERNATIVE B INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2018 Baseline		2018 Baseline With Additional Housing Alternative B		Mitigation Measure	2018 Baseline With Additional Housing Alternative B (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**119.6** 21.2	**F** C+	**137.5** 21.8	**F** C+	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	46.0 17.6	D B	LTS/SU
13	I-280 SB Ramps / Page Mill Road	Santa Clara County	LOS E (Warrant)	AM PM	**151.7** **85.9**	**F**	**153.5** **88.6**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	37.2 42.3	D+ D	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**97.2** **97.0**	**F** **F**	**104.7** **111.0**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	**100.4** **98.6**	**F** **F**	SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	71.8 **92.3**	E **F**	74.3 **95.4**	E **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	60.3 67.9	E E	LTS/SU
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	**55.2** 55.0	**E+** D-	**55.9** **56.1**	**E+** **E+**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	54.8 55.0	D- D-	LTS/SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.

[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.

[c] AM = morning peak traffic hour, PM = evening peak traffic hour.

[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.

[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.

[f] LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection; SU = significant and unavoidable.

SOURCE: Fehr & Peers, April 2018 (see Appendix ALT-TIA)

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, page 7B.15-420, fourth paragraph, second sentence, reference to Mitigation Measure 7B.15-2 is revised as Mitigation Measure 7B.15-2(a), to correlate with the previously described revisions to Mitigation Measure 7B.15-2, as follows:

> As discussed in further detail below, many of the intersections adversely affected under 2035 Cumulative with Additional Housing Alternative B conditions identified in Table 1B in Mitigation Measure 7B.15-2(a) are located in other jurisdictions, and consequently, the improvements depend on the actions of those jurisdictions.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, to correlate with the previously described revisions to Mitigation Measure 7B.15-2, Table 7B.15-13 on pages 2-433 and 2-434, references to mitigation are revised as MM 7B.15-2(a) (see following table). Please note also that the original references to the mitigation in Table 7B.15-13 were mislabeled as MM 5.15-2, instead of MM 7B.15-2.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, the second page of Table 7B.15-13 on page 2-434 was mislabeled as Table 5.15-13, and is corrected in the revised table (see following table).

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, Impact 7A.15-10, last paragraph, third sentence on page 2-436, to correlate with the previously described revisions to Mitigation Measure 7B.15-2, reference to Mitigation Measure 7B.15-2 is revised as Mitigation Measure 7B.15-2(a), as follows:

> Mitigation Measure 7B.15-2(a) would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fair share fees paid by Stanford from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips.

The Recirculated Portions of Draft EIR Section 7.4.5 Additional Housing Alternative B, second paragraph under Ability to Meet Project Objectives, page 2-460, the following edit is made in response to Comment RO-SCOPE-5:

> This alternative also would also not fully achieve the following more specific project objectives to: continue to allow Stanford flexibility to develop its lands within a framework that minimizes potential negative effects on the surrounding community; ~~enable Stanford to meet its needs to accommodate increasing enrollment and balance academic and academic support space growth with student housing growth by authorizing new and expanded student housing units/beds at a growth rate from 2018 through 2035 that is consistent with Stanford's historic annual growth rate for student housing, not including the unique Escondido Village Graduate Student Residences Project;~~ and prioritize use of campus lands within unincorporated Santa Clara County for academic and academic support facilities, student housing, and faculty housing.

TABLE 7B.15-13
2035 CUMULATIVE WITH ADDITIONAL HOUSING ALTERNATIVE B INTERSECTION LEVELS OF SERVICE
(MITIGATED CONDITIONS)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Additional Housing Alt. B		Mitigation Measure	2035 Cumulative With Additional Housing Alt. B (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
2	I-280 NB Off-Ramp / Sand Hill Rd	Menlo Park	LOS D	AM PM	**136.9** 18.4	**F** B-	**155.1** 19.0	**F** B-	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	**67.3** 16.0	**E** B	LTS/SU
17	Junipero Serra Blvd – Foothill Expy / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**180.4** **162.9**	**F** **F**	**191.0** **176.4**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	**150.5** **162.4**	**F** **F**	LTS/SU
19	Hanover Street / Page Mill Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**85.6** 51.9	**F** D-	**94.3** 60.1	**F** E	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	74.5 57.9	E- E+	LTS/SU
20	El Camino Real / Page Mill Road – Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	75.1 **83.1**	E- **F**	**88.1** **94.1**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	67.3 **81.1**	E **F**	SU
21	Middlefield Road / Oregon Expressway	Santa Clara Co. (SC CMP)	LOS E	AM PM	**122.7** **101.5**	**F** **F**	**125.5** **103.5**	**F** **F**	*N/A (no feasible improvements)*			SU
29	Foothill Expressway / Hillview Avenue	Santa Clara County	LOS E	AM PM	**124.6** 58.3	**F** E+	**133.5** 63.7	**F** E	*N/A (no feasible improvements)*			SU
30	Foothill Expressway / Arastradero Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	**194.5** **202.5**	**F** **F**	**200.8** **208.4**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	41.9 70.7	D E	LTS/SU
31	Foothill Expressway / San Antonio Road	Santa Clara Co. (SC CMP)	LOS E	AM PM	38.8 **165.8**	D+ **F**	42.7 **170.4**	D **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	42.7 46.4	D D	LTS/SU
32	Foothill Expressway / El Monte Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**142.6** **133.5**	**F** **F**	**148.5** **137.4**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	74.6 **113.5**	E **F**	LTS/SU
33	Foothill Expressway / Springer Road – Magdalena Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	**128.7** **151.5**	**F** **F**	**131.8** **154.5**	**F** **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	**122.7** **147.7**	**F** **F**	LTS/SU
37	El Camino Real / Encinal Ave	Menlo Park	LOS D	AM PM	44.9 **89.9**	D **F**	45.6 **92.7**	D **F**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	35.6 **67.1**	D+ **E**	LTS/SU
38	El Camino Real / Valparaiso Ave	Menlo Park	LOS D	AM PM	53.5 **56.0**	D- **E+**	54.0 **57.3**	D- **E+**	See MM 7B~~5~~.15-2(a) (Table 2~~1~~B)	52.5 52.3	D- D-	LTS/SU

TABLE 7B5.15-13 (CONTINUED)
2035 CUMULATIVE WITH ADDITIONAL HOUSING ALTERNATIVE B INTERSECTION LEVELS OF SERVICE
(*MITIGATED CONDITIONS*)

ID	Intersection	Jurisdiction/ CMP[a]	LOS Threshold[b]	Peak Hour[c]	2035 Cumulative		2035 Cumulative With Additional Housing Alt. B		Mitigation Measure	2035 Cumulative With Additional Housing Alt. B (Mitigated)		Impact Significance with Mitigation[f]
					Delay[d]	LOS[e]	Delay[d]	LOS[e]		Delay[d]	LOS[e]	
41	El Camino Real / Ravenswood Road	Menlo Park	LOS D	AM PM	48.0 **63.8**	D **E**	48.8 **66.1**	D **E**	See MM 7B5.15-2(a) (Table 21B)	46.6 **59.5**	D **E+**	LTS/SU
48	El Camino Real / Embarcadero Road	Palo Alto (SC CMP)	LOS E	AM PM	56.9 72.1	E+ E	62.1 **86.2**	E **F**	See MM 7B5.15-2(a) (Table 21B)	53.7 74.9	D- E	LTS/SU
56	Alma Street / Hamilton Avenue	Palo Alto	LOS D	AM PM	10.2 **57.7**	B+ **E+**	10.5 **62.0**	B+ **E**	See MM 7B5.15-2(a) (Table 21B)	10.1 40.3	B+ D	LTS/SU
58	Alma Street / Charleston Road	Palo Alto	LOS D	AM PM	123.4 121.5	**F** **F**	**128.3** **127.6**	**F** **F**	See MM 7B5.15-2(a) (Table 21B)	121.5 **124.0**	F **F**	SU
59	Middlefield Road / Marsh Road	Atherton	LOS D	AM PM	**76.9** **76.0**	**E-** **E-**	**79.8** **77.5**	**E-** E-	See MM 7B5.15-2(a) (Table 21B)	41.9 **68.6**	D **E**	LTS/SU
63	Middlefield Road / Lytton Avenue	Palo Alto	LOS D	AM PM	49.2 **66.1**	D **E**	51.1 **70.4**	D- **E**	N/A (no feasible improvements)			SU
66	Middlefield Road / Embarcadero Road	Palo Alto	LOS D	AM PM	55.0 **68.1**	D- **E**	**59.2** **73.1**	**E+** **F**	N/A (no feasible improvements)			SU
89	Central Expwy / Castro St-Moffett Blvd	Santa Clara Co. (SC CMP)	LOS E	AM PM	**240.1** **222.1**	**F** **F**	**243.9** **225.8**	**F** **F**	See MM 7B5.15-2(a) (Table 21B)	**97.0** **132.7**	**F** **F**	LTS/SU
90	Foothill Expressway / Edith Avenue	Santa Clara Co. (SC CMP)	LOS E	AM PM	55.9 **105.5**	E+ **F**	60.8 **118.8**	E **F**	N/A (no feasible improvements)			SU

Bold text indicates intersection operates at unacceptable level of service. **Bold and Shaded text** indicates a significant impact.

[a] Intersection jurisdiction and identification of CMP (Congestion Management Program) intersections. "(SC CMP)" indicates CMP intersection in Santa Clara County.
[b] LOS Threshold is the threshold between acceptable and unacceptable level of service. "(warrant)" indicates that meeting Signal Warrant 3 (Peak Hour Volumes) is part of the threshold of a significant impact.
[c] AM = morning peak traffic hour, PM = evening peak traffic hour.
[d] Whole intersection weighted average control delay (signalized and all-way stop-controlled intersections) expressed in seconds per vehicle calculated using methods described in the 2000 *Highway Capacity Manual*, with adjusted saturation flow rates to reflect Santa Clara County Conditions for signalized intersections. For side-street stop-controlled intersections, delay and LOS are reported for the worst-case approach.
[e] LOS = Level of Service. LOS calculations conducted using the TRAFFIX 8.0 analysis software program, which applies the methods described in the 2000 *Highway Capacity Manual*.
[f] LTS/SU = less-than-significant with mitigation, but is either (1) located outside Santa Clara County where mitigation measures depend on funding and actions by other jurisdictions, or (2) located in Santa Clara County, but depends on other funding for the mitigation to be constructed, and thus the mitigation measure may not be implemented in a timely manner to avoid the impact. Significance determination is based on draft mitigation and responsible jurisdiction of the intersection;
SU = significant and unavoidable.

SOURCE: Fehr & Peers, April 2018 (see Appendix ALT-TIA)

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