

5.2.1 Draft EIR Comment Letters – Agencies



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February 1, 2018

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street, San Jose, CA 95110

Subject: Stanford University General Use Permit Draft Environmental Impact Report

Dear Mr. Rader:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (EIR) for Stanford University's General Use Permit (GUP). It is our understanding that the GUP identifies allowed land uses, authorizes total square footage for academic and support facilities, authorizes total quantities of housing units and student beds, and specifies conditions for approval. We understand that Stanford is nearing completion of facilities and housing authorized by the 2000 GUP, so the University has prepared a new 2018 GUP application, and the County has prepared a Draft EIR for the proposed Project. It is our understanding that the 2018 GUP application supports construction of up to 3,150 net new on-campus housing units/beds and up to 2.275 million net new square feet of academic and support space by 2035.

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The Peninsula Corridor Joint Powers Board (JPB) supports Stanford University's 2018 GUP application and we appreciate the willingness of both the County and the University to meet during the preparation of the GUP and Draft EIR to discuss the included elements. Stanford University is an important partner for the JPB in its efforts to provide safe, reliable, and frequent rail service on the Peninsula Corridor. Strongly encouraged by the University, many Stanford affiliates, including employees and students, use Caltrain for their transportation needs, thus supporting Caltrain's service and boosting its ridership and revenue.

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With regard to the Draft EIR, the JPB understands that when evaluating multimodal transportation networks, the Governor's Office of Planning and Research (OPR) advises that "lead agencies generally should not treat the addition of new [transit] users as an adverse impact." The JPB notes that the GUP Draft EIR follows this recommended approach, so the addition of new

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transit users is not treated as an adverse impact and transit capacity is not evaluated as part of the Draft EIR's impact analysis.

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The JPB understands that the Draft EIR did, however, include a transit capacity analysis to provide information regarding the capacity of public transit systems to accommodate ridership growth resulting from the proposed Project. This transit capacity analysis included a ridership capacity analysis for Caltrain that compared Caltrain's current and anticipated future capacity with current and forecasted future ridership at peak stations for the years 2015, 2018, and 2035. It analyzed two future scenarios for 2035 to determine the forecasted passenger load at peak stations, including the share of ridership growth attributable to the proposed Project. The two scenarios analyzed were "Business as Usual," which assumed no new or enhanced Transportation Demand Management (TDM) strategies, and "Expanded TDM," which expanded TDM strategies to achieve no net new commute trips through 2035 by shifting drive-alone commuters to rail trips.

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The JPB offers the following specific comments in reference to this capacity analysis:

1. For the transit capacity analysis for 2015 and 2018 included in the DEIR, the JPB understands that the peak hour capacity analysis for Caltrain was estimated to be 3,250 passengers per peak hour. The analysis assumed that total capacity could accommodate 120 percent of the seated capacity with some standees, for a total capacity of 3,900 passengers per peak hour.

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The JPB would like to note that the average number of seats per car on Caltrain's existing diesel train cars is generally about 126 seats, and the average train length varies between five and six cars during the peak period. This results in an estimated total seated peak hour capacity of 3,705 seats per peak hour. The 120 percent seated capacity standard is consistent with the JPB's adopted Title VI standard and would result in a total capacity of 4,446 passengers per peak hour.

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2. For the transit capacity analysis for 2035 included in the DEIR, the JPB understands that the peak hour capacity analysis for Caltrain assumed that the electric multiple unit (EMU) trains had 112 seats per car. It also assumed that there were eight cars per train, and six trains per peak hour. Thus, the seated capacity on the EMU trains was assumed to be 5,370 passengers per peak hour. The analysis assumed that the total capacity could accommodate 120 percent of the seated capacity with some standees, for a total capacity of 6,444 passengers per peak hour in 2035.

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The JPB would like to note a few important points regarding the 2035 capacity analysis for Caltrain. The analysis references the Peninsula Corridor Electrification Project (PCEP), a nearly \$2 billion project that is fully funded and commenced construction in 2017. PCEP will replace 75 percent of

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Caltrain's existing diesel train fleet with EMUs and will install the electrification infrastructure necessary to support their operation between San Francisco's 4th & King Station and San Jose's Tamien Station. The project is on track to be complete by 2022, which is also when electric train service is anticipated to commence.

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Based on the current EMU configuration and planned mix of 6-car EMUs and 7-car diesel consists, the JPB believes that the seated peak hour capacity of the corridor in 2022 will be 4,088 seats – a 10.3 percent increase from today. At 120 percent of seated capacity this equates to a peak hour passenger capacity of 4,906.

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It is important to note that the JPB has not obtained funding to purchase additional EMUs to convert the remaining 25 percent of the JPB's current diesel-hauled train fleet that are not funded by PCEP. Additionally, the JPB has not obtained funding to purchase additional EMU train cars to extend the train length from six cars to eight cars during the peak hour. The ultimate seated capacity of a fully electrified, 8-car EMU fleet will vary depending on train configuration choices that have yet to be made. However, the JPB believes that full conversion of the mainline fleet to all 8-car EMUs would conservatively result in a peak hour seated capacity increase to 4,512, or 21.8 percent above today's levels.

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Finally, the JPB would also note that it has not yet developed a service plan for the electrified trains beyond the prototypical schedule contemplated in the PCEP EIR. The ultimate determination of a service plan will impact the train capacity available at any given station along the Caltrain line. Evaluating and refining service options for the electrified system will be a key component of the forthcoming Caltrain Business Plan.

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3. The Draft EIR also references the Go Pass as part of Stanford's existing Transportation Demand Management program. A current Caltrain fare product offered to employers, educational institutions, and residential developments, the Go Pass is a deep discount pass program that allows participating entities to purchase bulk annual travel passes for employees or residents. Under the current program, Go Pass holders are allowed unlimited travel across all six zones on the Caltrain corridor for the calendar year. Stanford University currently purchases Go Passes for all eligible employees and distributes them at reduced or no cost as part of its TDM program. The JPB would like to note that while there are no plans to change the Go Pass program at the present time, it may be subject to change in the future based on fare policy actions undertaken by the JPB.

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The JPB offers its support to Stanford University in its 2018 GUP application. As the JPB looks to the future with the anticipated completion of PCEP and

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commencement of electrified service in 2022, we also look forward to continuing to partner and collaborate with Stanford University.

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If you have any additional questions, please do not hesitate to contact me at ScanlonE@samtrans.com or (650) 295-6867.

Sincerely,



Elizabeth Scanlon
Director, Caltrain Planning

Cc:

Jim Hartnett, Caltrain
Michelle Bouchard, Caltrain
Sebastian Petty, Caltrain

Lesley Lowe, Stanford University

5.2.1.1 Responses to Comments from Caltrain

A-CALTN-1 No response is required.

A-CALTN-2 The comment is acknowledged; no response is required.

A-CALTN-3 The comment is acknowledged; no response is required.

A-CALTN-4 The comment is acknowledged; no response is required.

A-CALTN-5 to A-CALTN-6

The comment is noted, and the assumptions have been updated in a Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document).

Please also see Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for additional discussion of the updated analyses conducted as a result of the Peninsula Corridor Joint Powers Board's (JPB's) input.

A-CALTN-7 to A-CALTN-11

The comments are noted, and the assumptions have been updated in a Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document).

Please also see Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for additional discussion of the updated analyses conducted as a result of the JPB's input.

A-CALTN-12 The comment is noted. The no net new commute trips standard is a monitored performance standard, as opposed to a prescribed set of transportation demand management measures. The measures that Stanford uses to achieve the performance standard may change over time. At such time that a Go Pass is no longer offered by Caltrain, Stanford states that it intends to work directly with Caltrain to find an alternative method, such as a monthly pass, which would continue to allow Stanford affiliates to take advantage of the Caltrain service. Stanford considers its proximity to the regional rail corridor to be important to the success of its transportation demand management program and states that it will continue to partner with the transit agency.¹

A-CALTN-13 The comment is acknowledged; no response is required.

¹ See Appendix TRF-MISC in this Response to Comments Document.



City of East Palo Alto

Office of the Mayor

January 26, 2018

Santa Clara County
Department of Planning and Development
Planning Office
70 West Hedding Street, 7th Floor East Wing
San Jose, California 95110

Subject: Comments on the Stanford University 2018 General Use Permit Environmental Impact Report

Dear Santa Clara County Planning Dept:

This letter and its attachments are provided in response to the Notice of Availability for Public Review of the Draft Environmental Impact Report prepared for the Stanford General Use Permit. The impacts of this project are critical to East Palo Alto due to its proximity and scale. As indicated in this letter with its attachments, including a letter from JARVIS, FAY, DOPORTO & GIBSON, LLP; the DEIR raises a variety of serious legal, public policy and technical questions.

I want to emphasize that East Palo Alto values its relationship with its Stanford University, and we hope to continue to work cooperatively on the many issues common to both of our communities. We are accordingly prepared to work hard to resolve our concerns through good faith negotiations with Stanford University. In light of that prospect, East Palo Alto reserves the right to withdraw the enclosed comments by a further letter. If you have any questions you can call me anytime, or contact either Carlos Martínez, City Manager, at (650) 799-4772 or cmartinez@cityofepa.org, or in his absence, Sean Charpentier, Assistant City Manager, at (650) 833-8946 or scharpentier@cityofepa.org.

Yours truly,

Ruben Abrica, East Palo Alto Mayor

cc: East Palo Alto City Council

Attachments:

1. East Palo Alto Comments and Questions
2. SFJCPA Letter
3. Comment Letter from JARVIS, FAY, DOPORTO & GIBSON, LLP

East Palo Alto Comments and Questions

1. Affordable Housing Funds
 - a) The project will significantly exacerbate the jobs housing crisis by adding 5,262 jobs but only 550 new housing units. Page 5.12-4 indicates that in 2014, Stanford had a jobs housing ration of 2.7 employees per employed resident. To understand the impact of General Use permit, this number must provide that includes the growth envisioned in the General Use Permit. 2
 - b) Please clarify decision making body and process for Stanford Affordable Housing Fund. 3
 - c) The affordable housing commercial Linkage fee should be \$25 per square foot, which is more in line with surrounding jurisdictions 4
 - d) Stanford should build affordable employee housing, in particular for service employees, on campus. 5
 - e) East Palo Alto is concerned about linking funding to transit corridors since East Palo Alto is underserved by transit and does not have fixed rail transit. Recommend language that would ensure that East Palo Alto is not placed at a disadvantage. 6
2. Traffic
 - a) City Council is gravely concerned about traffic, especially since 84% of the peak hour traffic on University Ave is cuthrough traffic and the Stanford General Use Permit is proposing to add over 5,000 new jobs but only 500 new housing units. 7
 - b) Off peak traffic is a concern given that East Palo Alto residents are experiencing significant traffic at all times. 8
 - c) Stanford should create a fund specifically to fund class I bicycle facilities in neighboring cities to invest in more bicycle facilities and reduce vehicle trips. East Palo Alto projects that should benefit include the University Ave. bike pedestrian overcrossing, the Rail Spur trail, and the bicycle and pedestrian improvements included in the East Palo Alto Bicycle Transportation Plan and the General Plan. 9
 - d) To reduce incentives for single occupancy vehicle trips, Stanford should reduce its planned parking spaces, including new ones and the planned but undeveloped reserve. 10
 - e) Stanford should explore use maximizing use of car share options like Zip Car. 11
3. Hydrology
 - a) The proposed General Use Plan should include measures that either mitigate for increase flows and/or create no net increase in storm water runoff to the neighboring downstream communities that are located within the San Francisquito Creek Watershed Area. These are not adequately analyzed or described in the DEIR. 12

- b) The DEIR Hydrology and Water Quality section does not identify existing flood problems, but relies on existing detention facilities to control flows. There is no cited drainage study that documents existing remaining detention capacity or quantifies additional runoff volumes added for baseline, project and cumulative conditions to substantiate the conclusion that no offsite flooding impacts will occur. The Biological Resources section does in fact identify capacity and flood issues in San Francisquito Creek (page 5.3-46) with one or more on- and off-site detention basins being considered by the San Francisquito Creek Joint Powers Authority. The Final EIR must provide a review of existing flood issues in both watersheds in which the project is located, and in conjunction with the above comment, clearly document potential off-site flooding impacts for the baseline, project and cumulative scenarios. 13
- c) San Francisquito Creek Joint Powers Authority. Stanford should be required to coordinate and cooperate, including funding, with the San Francisquito Creek Joint Powers Authority to provide meaningful large-scale upstream detention facilities to attenuate and manage flows in San Francisquito Creek. 14
- d) Applicant (Stanford) shall continue to work with the City of Palo Alto, the San Francisquito Creek JPA, and other jurisdictions to develop a specific plan for the detention of floodwaters on Stanford land that will result in a significant and measurable reduction in floodwaters reaching the floodplain areas within Palo Alto, East Palo Alto, and Menlo Park. 15
- e) Additional comments as requested by SFCJPA and its members. The SFCJPA Comment letter is incorporated herein and included as an attachment to our letter. 16



December 4, 2017

Mr. David Rader
Santa Clara County
Department of Planning and Development
70 West Hedding Street
San Jose, CA 95110

Re: Comments on the Stanford University 2018 General Use Permit Draft Environmental Impact Report

Dear Mr. Rader:

The San Francisquito Creek Joint Powers Authority (SFCJPA) is a regional government agency that plans, designs, and implements capital projects that advance flood protection, ecosystems, and recreational opportunities across jurisdictional boundaries of its member agencies on the San Francisco Peninsula. We serve on the SFCJPA Board of Directors along with the mayors of Palo Alto and Menlo Park and the vice mayor of East Palo Alto. On behalf of the Board, we respectfully submit a comment regarding the finding of a "Less Than Significant" impact and no required mitigation for Impact 5.9-6: "Project development would create runoff, but would not exceed the capacity of existing or planned stormwater infrastructure, or result in flooding on- or off-site," within the Draft Environmental Impact Report (DEIR) for Stanford's 2018 General Use Permit (GUP) application to Santa Clara County.

The DEIR's discussion of this impact begins by acknowledging that new projects developed under the GUP could result in runoff that increases flows downstream and thus causes or exacerbates flooding. It states that the County requires that these projects safely convey all storm runoff through storm drain infrastructure or divert it to on-site detention facilities (that are mostly recreational fields). It concludes with statements that the detention facilities constructed as a condition of the 2000 GUP are designed to accommodate the 100-year storm flow and that they are "more than adequate to accommodate the net increase in impervious surfaces that would occur under the 2018 General Use Permit."

Technical staff at the SFCJPA and its member agencies have reviewed the Storm Drainage Detention Master Plan and the 2000 GUP Annual Reports, which are cited in the DEIR as the basis for the statements mentioned above. While helpful, these documents do not provide the information necessary to verify the capacity of the stormdrains.

Most importantly, while the 100-year event is of concern, the fact is downstream communities begin flooding during a 22-year storm flow in San Francisquito Creek. Thus, future campus development must not contribute runoff into the Creek's watershed throughout the peak flow period during an event equal to or larger than a 22-year storm, and not just for a 100-year event. If, as stated in the DEIR and its supporting documents, Stanford's existing detention basins are designed to only protect against the 100-year event, then the flooding impact of new development proposed under the 2018 GUP should be considered "Significant" until it is mitigated through the creation of a new detention basin. The SFCJPA is working with Stanford on, and analyzing within its own EIR, possible floodwater detention basins to reduce this proven threat to public safety, and we look forward to the construction of facilities that fulfill this need.

Sincerely,

Dave Pine
SFCJPA Board Chair
Supervisor, San Mateo County

Gary Kremen
SFCJPA Board Vice Chair
Director, Santa Clara Valley Water District

cc: Supervisor Joe Simitian, Santa Clara County
SFCJPA Board of Directors and Executive Director

650-324-1972 * jpa@sfcjpa.org * 615 B Menlo Avenue * Menlo Park, CA 94025

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cont.

JARVIS FAY DOPORTO & GIBSON, LLP

LOCAL GOVERNMENT LAW

January 26, 2018

David Rader
Santa Clara County Planning Office,
County Government Center
70 West Hedding Street
7th Floor, East Wing
San Jose, California 95110

Re: Comments on the Stanford University 2018 General Use Permit
Environmental Impact Report

Dear Mr. Rader,

Our office represents the City of East Palo Alto (“City” or “EPA”). We have reviewed the Stanford University 2018 General Use Permit Draft Environmental Impact Report (“DEIR”) prepared for Stanford University’s (the “University”) 2018 General Use Permit (“2018 GUP” or the “Project”). We have prepared the following comments on the DEIR in order to ensure that the DEIR adequately addresses environmental impacts to the City and its citizens as required by the California Environmental Quality Act (“CEQA”).¹

I. The DEIR Fails to Consistently Include the City of East Palo Alto in its Analysis of Local Jurisdictions

The DEIR fails to include the City in its regulatory setting, baseline, and impact analysis in several key locations. While the City is not directly adjacent to the Project site, the DEIR recognizes that the City may experience impacts from the Project and included it in some of its analysis,² but failed to analyze potential impacts to the City in certain chapters.

First, at chapter 5.10 (“Land Use and Planning”), the DEIR describes the existing environmental setting, nearby land uses, and baseline for purposes of identifying environmental impacts, but fails to refer to the City or its existing plans and policies.³ In chapter 5.12, (Population and Housing), the DEIR uses population and housing figures from all surrounding cities except for the City of East Palo Alto.⁴ Further, at chapter 5.14 (“Recreation”), the DEIR

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¹ The City has also engaged Paul Krupka of Krupka Consulting to separately evaluate and comment upon the DEIR’s traffic analysis

² See, for example, Chapter 5.15 (Transportation and Traffic), which indicates that the DEIR identified locations where the Project would contribute a noticeable amount of traffic for further study and analysis, including a variety of intersections in the City.

³ DEIR, chapter 5.10.

⁴ DEIR, chapter 5.12. See also Table 5.12-1 and Table 5.12-3, which describe the populations of surrounding local and regional jurisdictions but omit the City of East Palo Alto.

David Rader
January 26, 2018
Page 2

summarizes general plan policies of “Local Jurisdictions” including Palo Alto and Menlo Park, but fails to include the City in its analysis.⁵

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The DEIR’s failure to include the City in its analysis may also result in incorrect or misleading conclusions, so the DEIR should be corrected to include the City in all instances that surrounding local jurisdictions are considered and analyzed. Most significantly, the DEIR’s analysis of cumulative impacts in chapters where the City has been omitted may be inaccurate given that future projects in the City were not evaluated.⁶

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II. The Project Description is Internally Inconsistent; Conflicts with Transportation and Traffic Analysis Regarding “No Net New Commute Trips.”

The project description refers to the Stanford Community Plan (“SCP”), which is part of the County’s General Plan and essentially acts as a general plan for future development of the University. The project description states that the SCP “establishes a ‘No Net New Commute Trips’ standard, defined to mean no additional trips above a measured base level during the peak commute hours in the campus commute direction.”⁷ The project description further states that the Project will continue to implement programs to “help Stanford *achieve* its No Net New Commute Trips standard.”⁸ (Emphasis added).

The EIR is inherently unclear and contradictory as to whether the project will actually meet this “No Net New Commute Trips” standard. For example, despite the initial indication that the Project will “achieve” the No Net New Commute Trips standard required by the SCP, the project description later states that the No Net New Commute Trips standard may be “optionally achieved” by funding trip reduction programs to be implemented by other entities “in the vicinity” of the Project.⁹ The project description is thus internally inconsistent insofar as it suggests that the Project will comply with the SCP’s No Net New Commute Trips standard, but also suggests that the standard may not actually be met and provides an “optional” alternative. It is unclear whether (i) the Project must undertake this optional alternative (i.e. the funding of trip reduction programs in the vicinity of the project), or (ii) whether the optional alternative must also achieve the No Net New Commute Trips standard. These inconsistencies need to be reconciled and the text clarified to ensure that the Project complies with the SCP’s No Net New Commute Trips standard, regardless of the method employed to do so.

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⁵ DEIR, pp. 5.14-15 and 5.14-16.

⁶ See DEIR’s discussion of cumulative land use impacts (Impact 5.10-2) at pages 5.10-18 and 5.10-19. The analysis fails to include the City of East Palo Alto – or any of the City’s upcoming projects, etc. – in its discussion of cumulative impacts.

⁷ DEIR, p. 1-4.

⁸ Id.

⁹ Id.

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Furthermore, the project description conflicts with the analysis in the Transportation and Traffic section. As stated above, the project description suggests that the Project will comply with the SCP's No Net New Commute Trips standard, but the Transportation and Traffic analysis identifies four significant and unavoidable impacts associated with the traffic caused by the Project.¹⁰ And Mitigation Measure 5.15-2 states that mitigation will occur "either through a program of 'no net new commute trips' or through [funding of transportation improvements]." Thus, while the analysis identifies the SCP as an applicable regulatory plan that requires the University to comply with its No Net New Commute Trips standard,¹¹ the DEIR then later identifies significant and unavoidable impacts, which suggests that the Project will *not* comply with the No Net New Commute Trips standard.

We understand that the traffic analysis has taken a "conservative" approach by assuming the worst-case scenario (i.e. by assuming that the University does not increase trip reduction efforts¹²), but the SCP *requires* compliance with the No Net New Commute Trips standard.¹³ Because compliance with the standard is required, the Transportation and Traffic chapter should assume that the standard must be met, and analyze whether the Project causes traffic impacts that would exceed the standard. Instead, the DEIR analyzes the Project without the assuming that the standard must be met, and identifies four significant and unavoidable impacts. While the DEIR identifies mitigation intended to lessen these impacts,¹⁴ the analysis frankly acknowledges that the No Net New Commute Trips standard may not actually be satisfied. And it apparently leaves it to Stanford's sole discretion to determine whether it will actually comply with the standard, with no apparent role by the County or any other public agency in approving such non-compliance.

Thus, the Project's promise of compliance with the No Net New Commute Trips Standard is ephemeral and unenforceable and the project description and the remainder of the EIR are internally contradictory and unclear as to whether this standard will actually be met. EPA thus requests that the EIR be revised to cure this inadequacy of the project description.

III. The DEIR Fails to Adequately Define Academic Space

The project description states that buildout of the Project will result in "2,275,000 net new square feet of academic and academic support facilities."¹⁵ However, the DEIR does not adequately define "academic and academic support facilities." The DEIR's Land Use chapter¹⁶

¹⁰ See DEIR Table 1-1, p. 1-5. See also Chapter 5.15 (Transportation and Traffic).

¹¹ DEIR, pp. 5.15-42 through 5.15-45.

¹² DEIR, p. 5.15-65.

¹³ Or funding of specific transportation impact mitigation efforts proportional to the effect of new development. See description of SCP policy C(i)9 at DEIR p. 5.15-44.

¹⁴ DEIR Table 1-1, p. 1-5.

¹⁵ DEIR, p. 1-3.

¹⁶ DEIR, Chapter 5.10.

David Rader
January 26, 2018
Page 4

fails to describe the land uses associated with these facilities, and all other chapters fail to account for impacts that may come with those certain uses. For example, Chapter 5.15 (Transportation and Traffic) only analyzes traffic impacts based on the growth in “academic and academic support square footage.”¹⁷ If the facilities are developed as all classrooms, there may be a different traffic impact than there would be if the facilities were developed as classrooms, a gymnasium, a performing arts auditorium, and university offices. Certain uses have potentially greater environmental impacts – particularly traffic impacts – so it is important that the DEIR adequately define “academic and academic support facilities” by including the uses associated with those facilities.

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IV. Application and DEIR Improperly Identify On-Campus Affordable Housing

East Palo Alto is very concerned that the County may be inappropriately using on-campus student housing at the University as a credit against its obligations under state law to provide its fair share of affordable housing for the truly needy. Any failure by the County to meet its fair share will place a greater burden on East Palo Alto and other communities to accommodate such housing needs. The EIR needs to be amended to explicitly analyze the extent to which the Project will facilitate the County’s failure to satisfy such obligations, as well as the secondary environmental impacts on other communities resulting from such failure.

The University’s application (“Application”) states as follows: “Stanford has constructed 816 *on-campus* housing units that the County has recognized as affordable to low and very low income individuals and that the County credited toward its Regional Housing Needs Assessment as established in the Housing element of its General Plan.” (Emphasis added).¹⁸ This statement suggests that the County has taken credit for on-campus housing units which are available to and/or occupied by students and faculty – not low-income residents of the County.

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Pursuant to the state’s Housing Element Law,¹⁹ the County is responsible for providing for the housing needs of all economic segments of the community.²⁰ While the Association of Bay Area Governments (“ABAG”) determines the regional housing needs allocation (“RHNA”) for the County, it is the County that is responsible for providing housing capacity for each type of RHNA category (e.g. moderate-income, low-income, very-low income, etc.). Here, the Application and the DEIR indicate that the County has “credited” 816 on-campus units to satisfy its RHNA obligations for the “low” and “very low” income categories. However, on-campus housing appears to only be available to students and faculty, and there is no evidence in the Application or DEIR that suggests that the 816 units are available to provide low-income housing for County residents who meet the state income standards for it and who genuinely need it.

¹⁷ DEIR, p. 5.15-65.

¹⁸ Stanford University General Use Permit 2018 Application, p. 3.2.

¹⁹ Cal. Gov. Code §§65580 et seq.

²⁰ Cal. Gov. Code §65580(d).

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Further, and because the County may have improperly “credited” itself with providing those units, cities like East Palo Alto will have to assume a greater share of the County’s actual burden of providing housing for low-income workers at Stanford (i.e. commuting workers such as maintenance staff who are not students or faculty). The DEIR states that the “900 net new graduate student units/beds proposed...would equate to approximately 450 affordable housing units that would be credited by the County towards its Regional Housing Needs Allocation,”²¹ but again fails to explain whether those units are reserved for low-income students, how any such students’ income levels are determined (e.g. via application, etc.), and how the 900 units/beds “equates” to 450 affordable housing units as defined by state law. The County and the University therefore need to clarify how those housing units are being credited for purposes of satisfying RHNA obligations, and whether they should actually be eligible to satisfy such obligations.

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Finally, the Application states that the University has paid \$25.7 million into a fund to subsidize affordable housing in nearby communities, which is projected to grow to \$39 million with full development under the 2000 General Use Permit.²² It then states: “To date, approximately \$13 million of these funds have been disbursed to five projects in Palo Alto and Mountain View, totaling 319 units.” The Application and the DEIR fail to identify any specific opportunities in East Palo Alto for affordable housing projects. Impact 5.12-2 and Table 5.12-11 in the DEIR recognize that the Project creates a demand for off-site housing in the City,²³ so specific affordable housing funds and projects should be allocated and identified to mitigate those impacts within East Palo Alto.

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Very truly yours,

JARVIS, FAY, DOPORTO & GIBSON, LLP



Rick W. Jarvis

²¹ DEIR, p. 5.12-20.

²² Application, p. 3.2.

²³ See Table 5.12-11 and reference to the Project adding 41 households to the City of East Palo Alto.

5.2.1.2 Responses to Comments from City of East Palo Alto

A-EPA-1 Regarding the general comment made that the Draft EIR raises a variety of legal, public policy and technical questions, each of the specific issues raised by the comment in this letter are addressed in the individual responses to the comments that follow.

Regarding the comment that East Palo Alto values its relationship with Stanford and desires to work cooperatively on issues common to both communities, the comment is acknowledged.

A-EPA-2 The jobs/housing balance issue is an important policy issue that the County Board of Supervisors will consider when it decides whether, and under what conditions, the Project should be approved. For purposes of evaluating the Project's environmental effects, the CEQA Guidelines state that an EIR's discussion of growth-inducing effects should not assume that growth is necessarily beneficial, detrimental, or of little significance to the environment. (CEQA Guidelines Section 15126.2(d).) Here, the Draft EIR complies with CEQA by including data on employment expected to be generated by the proposed Project and estimating the number of new residential units that would be needed to provide housing for them.

A-EPA-3 The Stanford Affordable Housing Fund is administered by the County Office of Supportive Housing in accordance with guidelines adopted by the County Board of Supervisors for implementation of the Fund. Please also see Master Response 10: Affordable Housing, Topic 4: Process for Distribution of Affordable Housing Funds.

A-EPA-4 The County Board of Supervisors, as the decision-making body for the 2018 Stanford General Use Permit, will determine any in-lieu fee paid by Stanford for affordable housing demand generated by its academic development and is not bound by the \$20 fee proposed by Stanford. Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

A-EPA-5 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Please note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.

Please also see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives; Master Response 9: Population and Housing Methodology and Calculations; and Master Response 10: Affordable Housing.

- A-EPA-6 Please see Master Response 10: Affordable Housing, Topic 5: Geographical Distribution of Affordable Housing Funds.
- A-EPA-7 As noted in the East Palo Alto General Plan 2035, University Avenue (State Highway 109) is a major thoroughfare that connects U.S. 101 and the Dumbarton Bridge. The Draft EIR on pages 5.15-80 through 5.15-82 and on pages 5.15-118 through 5.15-120 provides the results of the evaluation of five intersections on University Avenue in East Palo Alto. The findings are that, even if Stanford did not achieve the no net new commute trips standard at buildout of the proposed 2018 General Use Permit, the Project would have a less-than-significant impact at these locations under both 2018 Baseline with Project conditions and 2035 Cumulative with Project conditions.
- A-EPA-8 As discussed on page 5.15-13 of the Draft EIR, the Level of Service methodology used to evaluate traffic operations identifies the highest single hour within the morning and evening peak period, and includes all traffic in and out of the intersection, including those vehicles traveling in the reverse commute direction to represent the worst-case condition within the peak period. By evaluating the worst condition within the peak period, the analysis ensures that the maximum effect of the proposed Project is identified, and if mitigation is warranted, that the mitigation is designed to prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum). Please also see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading,
- It should be noted that Stanford's TDM programs also reduce off-peak trips generated by the school's students and employees. Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion of the no net new commute trips policy.
- A-EPA-9 Please see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.
- A-EPA-10 Please see Master Response 13: Transportation and Traffic, Topic 13, Parking Supply and Restrictions for a discussion of the on-campus parking supply.
- A-EPA-11 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for details on transportation demand management programs (including car share options such as Zip Car) that are methods Stanford uses to achieve the no net new commute trips standard.

A-EPA-12 Please see Master Response 7: Flooding/Detention, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

A-EPA-13 As explained in the Draft EIR Hydrology and Water Quality section, as a condition of the 2000 General Use Permit, between 2001 and 2015, Stanford constructed on-site detention facilities on a watershed basis to create sufficient capacity to offset increased runoff associated with all new impervious surfaces constructed under the 2000 General Use Permit. Consequently, existing flooding issues in San Francisquito Creek are not a result of peak stormflows generated from the Project site development associated with the existing Stanford General Use Permit. Please see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities, and Topic 2: Monitoring of Stanford's Detention Capacity.

Furthermore, the Draft EIR explains that the proposed 2018 General Use Permit would not contribute to peak stormflows in San Francisquito Creek because sufficient remaining on-site detention capacity would exist to sufficiently handle peak runoff from the increased amount of impervious surfaces projected under the 2018 General Use Permit. Because Stanford would not contribute to additional peak flow, there would be no contribution to flooding in San Francisquito Creek. As such, development under the 2018 General Use Permit would not cause downstream flooding, nor would it contribute to cumulative downstream flooding. Please see Master Response 7: Flooding/Detention, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event.

A-EPA-14 Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

A-EPA-15 Please see Master Response 7: Flooding/Detention, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

A-EPA-16 Comment Letter A-EPA includes comment letter (as Attachment 2) from the SFCJPA, dated December 4, 2017. A letter with identical comments was submitted separately by the SFCJPA on January 4, 2018 to the County; that letter is included as Comment Letter A-SFCJPA in this Response to Comments Document. Please see that comment letter and associated responses.

A-EPA-17 The extent to which the regulatory setting, environmental baseline and impacts are addressed in the Draft EIR is based on the potential for the Project to result in

physical effects within a particular geographic area for each environmental topic. An EIR's environmental setting should be no longer than is necessary to understand the significant impacts of the proposed project and its alternatives (CEQA Guidelines Section 15125(a).) In general, and as discussed below, East Palo Alto was not included in the sections cited by the comment because significant environmental impacts were not projected to occur there. This comment provides no evidence that the Draft EIR omitted significant environmental impacts within the City of East Palo Alto.

For the Land Use and Planning section, the comment indicates the Draft EIR does not refer to the City or its existing plans and policies. The focus of the Draft EIR Land Use and Planning setting are to discuss land uses and land use plans that apply to the proposed Project and the Project site; this includes the County's plans and policies and certain regional plans and policies that apply to the Project, and significant Project impacts. For this reason, a discussion of land use plans and policies of all surrounding and nearby cities, including East Palo Alto, would not add information that is relevant to the environmental analysis, and therefore not included in the Draft EIR. Please note the Draft EIR concludes that all Project and cumulative land use impacts would be less than significant.

For the Population and Housing section, the comment indicates the Draft EIR includes population and housing figures from all surrounding cities except for the City of East Palo Alto. The presentation of population of local and regional jurisdictions in Table 5.12-3 is for informational purposes, and provides an overview of population in adjacent jurisdictions, unincorporated Santa Clara County, and total Santa Clara and San Mateo Counties. The City of East Palo Alto's population is included in the San Mateo County (Total) row in that table. The Draft EIR addresses the Project and cumulative population and housing impacts in the surrounding and nearby jurisdictions, including East Palo Alto, and concludes the impact would be less than significant.

For the Recreation section, the comment indicates that the Draft EIR includes the general plan policies of Palo Alto and Menlo Park, but not of East Palo Alto. The Draft EIR Recreation section addressed off-campus regional parks, major open space areas, trails, local parks and recreation facilities that would most likely be utilized by Stanford population; which consists of facilities within Palo Alto and Menlo Park because these cities are adjacent to the project site. Accordingly, recreation-related policies of those cities were discussed in the Recreation section of the EIR for informational purposes. Please note the Draft EIR concludes that all Project and cumulative recreation impacts would be less than significant.

Please also see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting, and Topic 2: Approach for Cumulative Scenario.

A-EPA-18 Please see Response to Comment A-EPA-17, above, regarding the approach for how the geographic study area is defined in the Draft EIR for each environmental topic, including Land Use and Planning, Population and Housing, and Recreation. In all cases where the proposed 2018 General Use Permit has the potential to result in Project or cumulative impacts in East Palo Alto (e.g., traffic impacts, etc.) the Draft EIR adequately discloses and mitigates those impacts to the extent feasible.

The comment provides no examples of East Palo Alto projects that were omitted that could cause new or substantially worse significant cumulative impacts, and no evidence that the Draft EIR's cumulative impact conclusions would be different if any such projects were included.

A-EPA-19 Please see Master Response 13: Transportation and Traffic, Topic 6, No Net New Commute Trips Standard for a discussion of the no net new commute trips standard and the fair share payments toward intersection improvements that would be required if the Project does not achieve the standard.

A-EPA-20 Please see Master Response 13: Transportation and Traffic, Topic 6, No Net New Commute Trips Standard for a discussion of the no net new commute trips standard and the fair share payments toward intersection improvements that would be required if the Project does not achieve the standard. The commenter acknowledges in footnote 13 of the comment letter that the Stanford Community Plan requires that Stanford achieve the no net new commute trips standard *or* fund specific transportation improvements proportional to the effects of new development. The Stanford Community Plan establishes a goal to achieve the no net new commute trips standard but expressly recognizes that this standard might not be achieved, and therefore also establishes a policy to ensure that, if the standard is not achieved, Stanford funds its fair share of feasible transportation improvements to mitigate the impacts of new development. Mitigation Measure 5.15-2 implements these Stanford Community Plan policies. While Master Response 13: Topic 6, No Net New Commute Trips Standard includes data and analysis demonstrating achievement of the no net new commute trips standard is likely, the EIR does not assume the no net new commute trips standard will be achieved because it is not certain that the standard will be achieved.

A-EPA-21 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity. The trip generation rates and trip distribution patterns used to predict traffic effects of future development under the 2018 General Use Permit were based upon the trip generation and distribution characteristics of the existing campus, which includes a broad range of academic and academic support uses such as classrooms, athletic facilities and venues, performing arts venues and museums, and support buildings. The rates and distribution patterns incorporate an assumption that new development would

contain a similarly broad mix of academic and academic support buildings and programs, which is a reasonable assumption based upon the best information that is available at this time. Specific programs that may be housed in individual buildings constructed under the 2018 General Use Permit are unknown.

A-EPA-22 The comment is noted. The means by which the County satisfies its obligations to provide housing needs for all economic segments of the community is a policy issue that may be considered by the County Board of Supervisors and is not related to how the proposed Project will have a physical effect on the environment.

Please also note, as discussed in Response to Comment A-EPA-5, the County published the Recirculated Portions of Draft EIR, which includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project.

Also, please see Master Response 10: Affordable Housing, Topic 6: Regional Housing Needs Assessment Affordable Housing Credit.

A-EPA-23 The comment is noted. The means by which the County satisfies its obligations to provide housing needs for all economic segments of the community is a policy issue that may be considered by the County Board of Supervisors and is not related to how the proposed Project will have a physical effect on the environment.

Please also see Master Response 9: Population and Housing Methodology and Calculations; and Master Response 10: Affordable Housing, Topic 6: Regional Housing Needs Assessment Affordable Housing Credit.

A-EPA-24 The comment is noted. The use of funds within the Stanford Affordable Housing Fund is determined by the County Board of Supervisors based on adopted procedures for disbursement of the fund. The use of funds within the Stanford Affordable Housing Fund is not a CEQA issue.

Please also see Master Response 10 Affordable Housing, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.

Comment Letter A-LLSD



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1011 Altschul Avenue
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February 2, 2018

County of Santa Clara
Department of Planning and Development
County Government
70 West Hedding Street
San Jose, CA 95110

Re: Draft Environmental Impact Report
Stanford University 2018 General Use Permit

Dear Mr. Rader,

Please accept the following comments of the Las Lomas School District staff with regard to the Draft Environmental Impact Report for the General Use Permit Application of Stanford University.

Las Lomas School District opposes any additional expansion of Stanford University beyond its current authorized limits that are not fully mitigated with appropriate housing and traffic mitigations.

1

Existing expansion projects at the University have adversely impacted traffic along major corridors through the school district. Primarily traffic to Stanford University from highway 101 through Willow Road, from highway 280 through Sand Hill Road, and increased traffic through El Camino Real and Alameda de Las Pulgas have impacted the Las Lomas School District. The additional traffic is resulting in hazardous roadways/intersection impacting our safe routes to school efforts. The safety of our students walking and biking will be adversely impacted by the increased traffic as a result of the proposed increased development. Mitigation measure must fully mitigate any increased traffic levels beyond the current unacceptable levels.

2

As well as the traffic impacts, the expansion of the University which results in additional employees and students must have full housing mitigation within the University's traditional boundary. Without this mitigation, any expansion may have an adverse impact on Las Lomas School District. Las Lomas School District is a community funded school district which does not receive any additional funding for new students. Adequate housing must be included as part of this project for additional staff, employees, and students. If adequate housing is not provided in the University boundary and Stanford rents or purchases homes for staff and/or students and utilizes its tax exemption status, all taxing entities, including our district, will lose critical funding.

3

Families occupying Stanford's housing stock will age in place and utilize the school district's resources without the landowner paying anything approximating the cost imposed on the public resource. The problem is exacerbated whenever the institutional landowner exercises its option to assert the so-called "welfare exemption" to property tax for property that is indisputably residential in character. While Stanford clearly benefits in the labor market from offering housing to its employees and affiliates, those residents become members of the public whose relationship to their public institutions are essentially severed. They, unlike owners or regular renters, contribute less or (in some cases) essentially nothing to the system of property tax that underpins California public institutions.

4

It is the belief of the Las Lomitas School District that the impacts to school facilities caused by Stanford's proposed development without sufficient corresponding housing within the resident district boundaries will have a negative effect on the quality of education of our community. We ask that the County consider imposing mitigation measures that address the impact to schools caused by the conversion of formerly non-residential land to residential uses by ensuring that the balance between increased enrollment and rising property taxes is not upset by the acquisition of substantial non-residential property by long-term institutional owners whose tenants will consume public resources while their landlords contribute little or nothing by way of property tax, and by ensuring that residential impacts are mitigated on Stanford's current land without encouraging further acquisition and conversion of other lands.

5

Sincerely,



Steven R. Fuentes
Chief Business Officer

5.2.1.3 Responses to Comments from Las Lomitas School District

- A-LLSD-1 The Draft EIR analyzes all potentially significant Project and cumulative impacts, and identifies feasible mitigation measures where appropriate, to mitigate these impacts to the extent possible. Please see responses to the specific comments raised below; see also Master Response 3: General Comments on EIR and Environmental Topics.
- A-LLSD-2 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative pedestrian and bicycle safety impacts associated with the construction and operation of the proposed Project on study area roadways.
- Please see also Master Response 13: Transportation and Traffic, Topic 10, Bicycle and Pedestrian Analysis for a discussion of bicycle and pedestrian safety, and Master Response 13: Transportation and Traffic Topic 9: Design Hazards and Safety Impacts for discussion of traffic safety hazards.
- A-LLSD-3 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA. State law also establishes exclusive mitigation (“SB 50” school mitigation fees) for school impacts and preempts local authority on this issue.
- Impacts of the Project on housing supply is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Nevertheless, on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which included a new impact (Impact 5.17-1) that discussed the indirect impacts of off-campus housing associated with the Project. The Recirculated Portions of Draft EIR also included two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.
- A-LLSD-4 As explained above, state law establishes mitigation for school impacts and preempts local authority on this issue. Property tax assessment methods are also governed by state law.
- A-LLSD-5 As explained above, state law establishes mitigation for school impacts and preempts local authority on this issue. Property tax assessment issues are also governed by state law.



February 1, 2018

Mr. David Rader
County of Santa Clara
Department of Planning and Development
County Government Center
70 West Hedding St.
San Jose, CA 95110

RE: Stanford University "2018 General Use Permit", Draft EIR Comments

Dear Mr. Rader,

Please find attached the City of Menlo Park's comments on the Draft Environmental Impact Report (DEIR) for the Stanford University "2018 General Use Permit" (GUP) Project (File #: 7165-16P-16GP-16Z-16EIR).

The attached comments highlight several significant deficiencies in the Draft EIR that must be addressed in a recirculated Draft EIR with sufficient mitigation measures to mitigate any impacts identified prior to the County considering the 2018 GUP for approvals. The City appreciates the opportunity to comment on the proposed project. Please contact Assistant Public Works Director, Nikki Nagaya at 650-330-6770 or nhnagaya@menlopark.org with any questions.

1

Sincerely,

Peter Ohtaki
Mayor

Enclosure

Project Description Concerns and Questions

1. Stanford is seeking “flexibility with accountability.” The application and DEIR indicate that the total amount of academic square footage may take many forms, from classroom buildings to art galleries to energy facilities. Similarly, the anticipated housing units/beds will include a range of products from undergraduate dormitories to single-family homes for faculty. These different uses will have disparate impacts. Without specificity as to the amount, location and intensity of the various uses, there are no assurances that the impacts have been adequately assessed in the DEIR. Further, there is no mention in the DEIR that further study will be conducted to determine whether what does eventually get built is within the parameters of the DEIR or creates additional impacts that require additional mitigation. This seems critically important for a document that is anticipated to govern development for the next approximately 17 years in an area that is seeing rapid transition in local and regional conditions and circumstances. The City requests that clear accounting of the proposed uses and location of such uses be documented, and no changes to the provided allotments of developable area be allowed without a full assessment of any further environmental impacts. Further, as evidenced by the Center for Academic Medicine project application, any transfer of development request needs to include explicit consultation with and notice to the City of Menlo Park, particularly in the area of traffic concerns. The City has included recommended revisions to Condition of Approval G11 from the 2000 GUP, which are outlined below in comment 6.

2
2. The 2018 GUP should preserve the Academic Growth Boundary and the extra increment of foothill protections (i.e., the 4/5ths vote for development west of Junipero Serra Boulevard) in order to ensure ongoing open space and conservation efforts are recognized as a serious concern. The City requests the Academic Growth Boundary be preserved for at least the next 50 years.

3
3. The maximum build out of the Stanford campus should be identified, defined and evaluated in the 2018 GUP and DEIR. Such definition was required during the 2000 GUP development, as a condition of approval, but has not yet be identified or imposed here. This is important to provide the community and neighboring jurisdictions a clear picture of when growth limits would be reached; further, the current process provides no assurances to the maximum extent of growth and development on the campus.

4
4. Stanford will be increasing the population of students, faculty, staff and other workers from 41,217 in 2018 to 50,827 by 2035. However, it is not clear that these numbers reflect the full picture and include families of students and faculty, deliveries, consultants, contractors and various visitors who travel to and from Stanford. The assumptions should be clearly outlined in the DEIR.

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5. The 2018 GUP and DEIR should evaluate changes in the Project Description, or as mitigation

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City of Menlo Park
Stanford University “2018 General Use Permit”, Draft EIR Comments

measures to:

- a. Prohibit an increase in net new parking spaces
- b. Provide a direct roadway connection from Campus Drive West to I-280 between Page Mill Road and Alpine Road without a connection at Junipero Serra Boulevard. Also force traffic to use Page Mill Road over Alpine Road since there are limited residences along Page Mill frontage
- c. Add locations for traffic monitoring at gateways to Stanford Land beyond the cordon locations that are specific to unincorporated Santa Clara County to account for development in the Quarry, Lathrop and San Juan districts (see comment 7.k.ii. below)
- d. Require trip credits to have some spatial or geographic relevance based on Gateways and cordon limits around the Stanford campus

10

- 6. In the 2000 GUP conditions of approval, condition G11 required project-specific traffic studies for certain projects. Subsequent to adoption of the 2000 GUP and conditions, the County prepared *Scoping of Project-Specific Transportation Studies under Stanford GUP Condition of Approval G11* (dated January 16, 2002). These documents do not directly address the need for a project-specific traffic study for relocation of planned development levels across Campus district boundaries, and the City requests this document be modified, if to be carried over for use subsequent to the 2018 GUP. Further, the City requests that a project-specific traffic study be completed for all projects that generate over 50 peak hour trips to ensure transparency and consistency across future proposals. The City has documented suggested revisions, as included in Attachment A. Further, the City requests that the Board of Supervisors must consider any request to relocate development to a different district, and approval be required to reach a 4/5 vote in favor, including the Supervisor from the District.

11

Transportation

- 7. The transportation analysis shows several deficiencies with respect to¹:

- a. Existing congested conditions are not reflected in the intersection analysis.

The existing conditions analysis does not reflect congested conditions on the Bayfront Expressway, Willow Road, University Avenue, El Camino Real, and Sand Hill Road corridors as of the time the existing counts were taken in 2016. The reported results at the following locations do not reflect field observed conditions:

- i. Bayfront Expressway/University Avenue
- ii. Bayfront Expressway/Willow Road
- iii. Willow Road intersections

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¹ All page number references within this comment point to the Transportation Impact Analysis, Part 2 in Appendix TIA of the Draft EIR. Similar comments apply to the same content shown in the Draft EIR.

**City of Menlo Park
Stanford University “2018 General Use Permit”, Draft EIR Comments**

iv. Sand Hill Road/Santa Cruz Avenue-Alpine Road

The existing congested conditions on the corridors and intersections listed above are not taken into account by isolated intersection analysis. As summarized in the City of Menlo Park’s General Plan (ConnectMenlo) Draft Environmental Impact Report published in 2016, isolated intersection analysis does not account for the queue spillback between intersections on the approaches to the Dumbarton Bridge, including those on Bayfront Expressway, Willow Road, and University Avenue. The TRAFFIX 8.0 software that was used for the analysis is not sufficient to reflect the existing or future (2018 or 2035) congestion levels. The TIA (Section 4.8, page 94-95) describes the observed queues and congested conditions on El Camino Real and Sand Hill Road, but does not use this information to validate the calculated existing levels of service (Figure 4-2 on page 54 and Table 4-1 on pages 55-60) on the corridors. Field observed conditions are not described on Willow Road and the Dumbarton Bridge approaches. These level of service calculations need to be updated in order to present an accurate existing scenario to assess impacts of the 2018 GUP. Otherwise, potential impacts are underestimated. The Draft EIR should be updated and recirculated with corrected information that mitigates all additional impacts.

13

b. Existing congested conditions are not reflected in the freeway and ramp analysis.

Similarly, the freeway ramp analysis at the US 101/Willow Road interchange and the I-280/Sand Hill Road interchange do not reflect existing congested conditions, and therefore the volume-to-capacity analysis conducted does not take into account the unserved peak period demand and queue spillback. Analysis based on these existing results therefore underestimates potential impacts of the 2018 GUP. The analysis must be updated and the Draft EIR recirculated with the corrected information, including appropriate mitigation for all additional impacts.

14

c. The No Net New Commute Trips mitigation program does not fully mitigate transportation impacts and must be modified.

The 2018 GUP application materials and Draft EIR describe Stanford’s continued participation in the No Net New Commute Trips mitigation program. The program limits peak hour, peak direction vehicular trips associated with Stanford University. However, this program is fundamentally flawed and does not fully mitigate transportation impacts for several reasons:

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- i. Congested conditions in the region are no longer limited to a single morning and evening peak hour. The monitoring program should be expanded to capture the hours of congestion across the peak periods, at a minimum from 7:00 – 9:00am and 4:00 – 7:00pm, since the program encourages peak spreading to shoulder and off-peak hours. Daily trip limits should also be considered to reduce potential air quality and greenhouse

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City of Menlo Park
Stanford University “2018 General Use Permit”, Draft EIR Comments

gas impacts.

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cont.

- ii. While traffic flows still see some directionality, reverse peak direction patterns are increasing and even reverse direction trips in the peak hours can contribute to congestion.

The proposed 2018 GUP is estimated to add 428 AM and 600 PM peak hour trips in the reverse commute direction. This represents a significant proportion of the proposed growth in traffic, representing 36% of morning and 44% of evening peak hour traffic. The proposed analysis does not isolate the potential impacts of these trips, and they are not mitigated by the No Net New Commute Trips mitigation program, which only limits the peak direction trips. Therefore all reverse peak trips are added to the roadway network, with undetermined impacts, and are not currently mitigated.

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The City requests that an analysis of the reverse direction trips be conducted and appropriate mitigation measures be identified. The mitigation program should could be expanded to limit any new impacts from reverse commute trips by including them in the No Net New Trips program, and no growth in such trips should be allowed over existing conditions. This analysis should be prepared and the DEIR recirculated with this significant new information.

- iii. Monitoring of the program is infrequent and does not assure neighboring jurisdictions that the program achieves its goals on a typical basis. Monitoring occurs twice per year, and while conducted in typical traffic conditions, this limited frequency allows the potential for ongoing violations. The City requests the County modify the monitoring program to provide consistent, daily monitoring. Such monitoring and enforcement is conducted by the City for the Facebook Campus site in Menlo Park, and provides assurances that the trip limits are met on a daily basis throughout the year. This increased frequency is enabled more readily, since under the current proposal, Stanford and the County propose to use automated technology to conduct the counts in the future. The City requests that no new development be allowed beyond the 2000 GUP until such automated equipment and increased monitoring is in place.

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- iv. The use of “cordon credits” and a campus-wide monitoring methodology allow Stanford to offset peak hour, peak direction vehicle trips occurring anywhere in the cordon area at the expense of other potentially affected roadways. In particular, the Sand Hill Road and El Camino Real (north of Stanford) corridors have not seen investment in infrastructure or program support to reduce vehicle traffic levels approaching the University from these directions, and traffic congestion has increased since the 2001 GUP analysis. In addition, the 2014 Annual Traffic Monitoring Report claimed 402 trip credits for bus trips across the cordon points and the number of transit passengers served outside the cordon area in

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	the evening peak hour, but no data is provided about how the individual cordon locations have increased or decreased over time. The City’s own traffic counts on Sand Hill Road (near the City of Menlo Park and Palo Alto border) show an increase in average daily traffic volumes from 30,550 vehicles to 33,900 vehicles per day between 1998 and 2017. The DEIR also does not disclose Marguerite transit ridership by route and stop to demonstrate which corridors are achieving trip credits per the allowance of “cordon credits”. The City requests the historic raw cordon count data and Marguerite ridership data be included in a revised and recirculated DEIR. The City requests that the cordon trip limits be established by sub-area or district to ensure that the levels of traffic in any one corridor are not adversely affected at the expense of others.	19 cont.
v.	Chapter 8 of the TIA details the tiered mitigation program steps if Stanford does not achieve the No Net New Commute Trips goal. However, as described in Section 8.1.1.3 through 8.1.1.5, Stanford would fund infrastructure changes and programs to reduce vehicle trips in the vicinity of the campus if the No Net New Commute Trip goal is not successful. This shifts the burden of mitigation to neighboring cities, when the mitigation is necessitated by Stanford’s non-compliance with the mitigation measure. Stanford should instead assume responsibility, in collaboration with neighboring agencies to design and construct physical infrastructure and provide resources to help implement necessary programs to reduce trips as identified in these sections. The City requests that a contribution towards the Middle Avenue Pedestrian/Bicycle Crossing, Dumbarton Rail Corridor, and Sand Hill Road-Santa Cruz Avenue-Alameda de las Pulgas-Alpine Road corridor improvements be prioritized for mitigation. The City also requests that penalties be assessed if the trip reduction goals are not met.	20 21 22
vi.	Section 8.1.1.5 of Chapter 8 of the TIA further outlines the payment methodology to determine Stanford’s fair share of the intersection improvements on a per trip basis. This section outlines that the proposed payments would be on an annual basis, and since the 2018 GUP is projected to carry development through 2035 (17 years), the total contribution towards all intersection improvements would be divided by 17. This proposed methodology does not mitigate Stanford’s contribution towards impacts in the City, and other neighboring agencies, as sufficient funds would not accrue to cover the construction cost of the necessary mitigation – which since a Project level impact (see comment 7.g. below) – is necessary to reduce the Project’s impact to a less-than-significant level. The proposed methods also do not account for escalation in construction costs over the life of the proposed 2018 GUP.	23
d.	All relevant near term projects should be included in the analysis. According to Table 2 in Appendix CON, the Stanford Shopping Center Expansion and Stanford Redwood City campus are not currently included as near-term projects, and should be included in the DEIR’s evaluation. Notably, the traffic analysis should be revised to include these projects, as traffic from the Shopping Center directly overlaps with the traffic accessing the University	24

from El Camino Real and Sand Hill Road; and traffic from the Stanford Redwood City campus will occur on Marsh Road, Bay Road, Bayfront Expressway, Middlefield Road and El Camino Real, among other streets in the area, which are also studied in the 2018 GUP DEIR. Not including the Stanford Shopping Center and Redwood City campus underestimates the near-term and cumulative traffic impacts. Further the DEIR should explicitly describe the anticipated interaction between the Stanford University campus and the Stanford Redwood City campus. The City requested this information in its NOP letter (comments 5, 6, and 8), but it was not provided in the DEIR.	24 cont.
e. At the time the Stanford Hospital Expansion was considered by the City of Palo Alto, the City of Menlo Park challenged the traffic projections as underestimating the likely impacts of the project due to a significant allowance for TDM reductions. The City requests that the County independently evaluate the traffic projections used for the Hospital Expansion in the Background conditions of the DEIR transportation analysis and TIA.	25 26
f. The traffic projections shown on El Camino Real and Sand Hill Road appear to be underestimated. The DEIR and TIA should be revised to correct the underestimation, impacts reevaluated, and recirculated with this substantial new information. For example: i. Sand Hill Road/Santa Cruz Avenue (study intersection 7 in the TIA): certain traffic movements are shown to have less traffic under Background as compared to Cumulative conditions: the westbound left-turn (decreases by approximately 50 vehicles) and the northbound right-turn (experiences no change from Existing conditions, even with anticipated build out of the Stanford Hospital, 2000 GUP, and other projects in the area). Similarly in the cumulative conditions the westbound left-turn, southbound right-turn, eastbound left- and right-turns, and northbound left- and right-turns experience decreases of up to 200 vehicles per hour. ii. El Camino Real/Ravenswood Avenue (study intersection 41 in the TIA): Background conditions does not appear to adequately account for the buildout of projects in the area as listed. In particular, the growth shown between Existing and Background conditions at certain movements in the 2018 GUP DEIR and TIA is less than that shown for the Middle Plaza at 500 El Camino Real project alone. For example, the westbound left-turn in the 2018 GUP DEIR shows growth of 9 vehicles in the AM peak hour, while the Middle Plaza EIR shows 70 vehicles. Similar concerns exist for the northbound through and right-turn movements, eastbound right-turn and southbound through movement.	27
g. Project level impacts identified under Background Conditions should be fully mitigated. The DEIR and TIA identify mitigation measures for Background plus Project conditions as fair-share payment towards potential physical improvements. CEQA, in sections PRC	28

20112(a) & 14 CCR 15126.4, requires that project-level impacts be mitigated. The Project should be responsible for construction of mitigation measures that result from Project-level impacts.

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h. Comments on specific mitigation measures

- i. I-280 Northbound Ramp/Sand Hill Road. A fair share contribution is not adequate, per comment 7.g above. Bike lane is not protected, as stated on page 172.
- ii. El Camino Real intersections. A fair share contribution is not adequate, per comment 7.g above, and proposed improvements conflict with recent City direction and Middle Plaza at 500 ECR DEIR recommendations.

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i. Bicycle and pedestrian impact evaluation and proposed mitigation

While the effort to assess mitigation measures impacts on multi-modal travel, in addition to identifying vehicular improvements to mitigate traffic impacts, is appreciated, this assessment does not address bicycle and pedestrian demand and facility needs as a result of this Project. Key access routes to the Campus were recently evaluated as part of the Bicycle Access Plan, and gaps in the existing networks should be evaluated and mitigated appropriately. Similar efforts for the pedestrian network should also be completed. The City requested such an analysis in its NOP letter, an analysis of a 5-mile commute shed around the proposed General Use Permit development area. As noted in the permit application, Stanford owns land throughout the mid-Peninsula, including proposed development sites in Menlo Park and an approved project site in Redwood City. The City requested that the DEIR assess walking, bicycling, and traffic conditions across Stanford properties located across these multiple jurisdictions. This comment on the NOP was not addressed and the DEIR should be revised to include such an analysis and recirculated.

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Further, Section 8.4.2 on page 218 discloses that the Project does not conflict with a planned facility or local agency policy. The City’s El Camino Real/Downtown Specific Plan, and follow up work through the El Camino Real Corridor Study, identify potential bicycle lanes on El Camino Real. The proposed mitigation conflicts with these plans. This is not addressed in the DEIR and the analysis should be revised and DEIR recirculated with identification of appropriate mitigation.

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In addition, without provisions for bicycling and walking, Safe Routes to Schools within the City of Menlo Park are anticipated to be impacted by increased traffic as a result of the 2018 GUP. The City requests financial assistance for crossing guards.

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j. Neighborhood street impacts are not fully addressed

Neighborhood street impacts (Section 8.3 on page 199) in the Willows and Belle Haven

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neighborhoods in Menlo Park are not addressed. The Crescent Park neighborhood in Palo Alto was evaluated, and cut-through traffic from that area also directly impacts the Willows, across the Pope-Chaucer bridge over San Francisquito Creek. Additional traffic added to Bayfront Expressway, Willow Road and University Avenue will also lead to additional cut-through in the Belle Haven neighborhood as commuters seek out alternative routes. Both of these should be addressed. The City of Menlo Park has adopted standards and thresholds of significance that should be used to evaluate increases in daily roadway traffic volumes on local streets in lieu of the TIRE Indices Analyses prepared following the City of Palo Alto standards. Based on Table 8-5 on page 217, cut-through volumes on Lytton Avenue and Hamilton Avenue near Pope-Chaucer are between 76 and 145 daily trips. These increases in traffic through the Willows would be considered significant following City of Menlo Park impact standards, and need to be evaluated and mitigated accordingly in a recirculated DEIR.

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- k. The DEIR does not address the NOP comments the City provided as listed below.
- i. Stanford is requesting continuation of a program to provide trip credit for off-campus transportation infrastructure improvements within the Cordon Credit Area, which includes properties owned by Stanford outside of Santa Clara County, including 500 El Camino Real and 2131 Sand Hill Road. The City requests that any required measures to reduce or mitigate impacts from the Middle Plaza at 500 El Camino Real project recently approved or 2131 Sand Hill Road project currently under review are not eligible for credits under the General Use Permit program, since this would result in double-counting the benefits of such measures.

ii. The Draft EIR did not address how vehicle trips from the proposed development areas outside the traffic cordon area, including Quarry, Lathrop, and San Juan in particular, will be addressed by the No Net New Commute Trips condition. The City requested the County modify the cordon area to incorporate these zones with additional proposed development.
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- Housing
8. The proposed \$20 per square foot (plus CPI adjustment inflator) affordable housing impact fee is not adequate to mitigate the increased demand for affordable housing by the proposed 2018 GUP. The rate of housing construction costs has generally outpaced the CPI, so the fee as proposed does not keep pace with rising costs and will not allow construction of the identified housing unit demand within Menlo Park.

9. In addition, when Stanford University purchases or develops property for the provision of faculty and staff housing in adjacent jurisdictions, including both the City of Menlo Park and local school districts, the City and school districts lose property tax revenues from the property in perpetuity,
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- City of Menlo Park

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since Stanford does not pay property taxes on lands used to support the University. This creates a two-fold negative impact to the City and other affected agencies, since the City loses revenues and has to continue to provide the municipal services necessitated by the residential properties. It also further increases the cost of housing in the region, as the market-rate housing supply is decreased by such actions. Requiring Stanford to provide all housing on campus will avoid this impact. Further, the City requests that any growth in academic or support facilities be offset with commensurate growth in housing units on campus.

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cont.

10. As availability of affordable housing continues to be a regional concern, the City requests that the County maximize additional benefits for housing supply for faculty, staff, and students, as well as for workers that may not be employed directly by Stanford, but work within the General Use Permit area. Specifically, the City requests that the full housing burden generated by the 2018 GUP be absorbed on the Stanford Campus, within the 2018 GUP development area. Further, the City requests the County retain the 6-mile radius for use of affordable housing fees, since the impacts are most concentrated locally near the Stanford University campus. Further, the City requests that funding from housing fees be dedicated to impacted cities, commensurate with the level of anticipated impacts (e.g., proportional to the number of units needed to house Stanford employees). The provision of such fees is one of the few strategies that can be used to help offset the housing impacts identified as a result of the 2018 GUP and should be maintained.

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11. The DEIR acknowledges that Stanford’s growth pursuant to the 2018 GUP will require housing in adjacent jurisdictions such as Menlo Park. The DEIR anticipates 153 new housing units in Menlo Park. Since the growth with the 2018 General Use Permit is anticipated to be at the same rate as the 2000 General Use Permit, the anticipated units in Menlo Park may be under estimated because 215 units associated with the 2000 General Use Permit have been approved for construction in Menlo Park at the Middle Plaza at 500 El Camino Real site.

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Air Quality and Noise

12. Given the comments regarding peak spreading, the air quality and greenhouse gas analysis should be reevaluated to determine the continued accuracy of the conclusions relative to reductions in pollutants, especially since a full 1/3 of emissions are anticipated from transportation sources.

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13. Stanford is proposing to construct up to 40,000 net new square feet of child care centers and other services on campus. However, in the chapter regarding air quality (see Figure 5.2-1), the DEIR does not consider on-site sensitive receptors like the new proposed day care centers and should be revised to reflect this change.

42

14. Noise impacts on the Sand Hill Road corridor should be mitigated near residential uses.

43

Hydrology/Water Quality

15. Stanford should be required to coordinate and cooperate, including funding, with the San Francisquito Creek Joint Powers Authority to provide meaningful large-scale upstream detention facilities to attenuate and manage flows in San Francisquito Creek.

44

16. The DEIR did not adequately respond to the City request that Stanford continue to work with the City of Menlo Park and other jurisdictions to develop a specific proposal for the detention of floodwaters on Stanford land that will result in a significant and measurable reduction in floodwaters reaching the floodplain areas within Menlo Park and neighboring jurisdictions. The City requests that existing and proposed runoff calculations from the project area for both the 10-year and 100-year storm event be provided for the City to review and that the impact be evaluated in a revised and recirculated DEIR. In addition, the City requests that any plans that show existing and proposed impervious improvements and potential alteration of drainage patterns be provided. Combined with the improvements downstream within San Francisquito Creek, the detention on Stanford land shall result in containment of flows from the 10-year and 100-year storm events within the detention site(s) and within the Creek to the extent feasible. The detention plan shall be designed and implemented by Stanford within a specific time line that is relative to the proposed development.

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17. In addition, the City requests that the proposed General Use Permit include measures that either mitigate for increase flows and/or create no net increase in storm water runoff to the neighboring downstream communities that are located within the San Francisquito Creek Watershed Area.

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Other Issues

18. The DEIR dismisses the impact of new students, faculty and staff on neighboring library facilities positing that Stanford is an academic university with libraries and visiting a local library is not necessary. However, there are many reasons to visit a library--a college student's reason may be different from a faculty member who has a toddler and wishes to participate in story time at the library. If Stanford does not provide such services at its libraries, it is likely that there will be more visits to libraries in surrounding jurisdictions and potential impacts. The same is true of the impacts on parks and other community based recreation programs.

47

19. In anticipation of the Final EIR review period, the City requests that a minimum of 30 days be granted for public review.

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5.2.1-35

**Scoping of Project-Specific Transportation Studies under
Stanford GUP Condition of Approval G11**

1/16/02

Background

On December 12, 2000, Santa Clara County approved Stanford University's draft Community Plan and General Use Permit application and certified the associated Environmental Impact Report (2000 GUP EIR). This EIR analyzed the impacts associated with the construction of approximately 2 million gross square feet of academic and academic support uses, approximately 3,000 new housing units, and approximately 2,900 new parking spaces (the number of new parking spaces was limited to 2,300 in the final approval).

The traffic study in the 2000 GUP EIR estimated the new trips "generated" by additional students, faculty, and staff on campus and additional resident population from new housing. The additional generated trips were then "distributed" within the network and were allocated among traffic analysis zones, taking into consideration the anticipated location of housing areas and parking lots, as well as existing traffic patterns.

Mitigation measures to address the impacts of the 2000 GUP development were developed, and Conditions of Approval were attached to the 2000 GUP. These mitigation measures and conditions approached the impacts in a comprehensive manner, so that individual projects that were approved under the 2000 GUP would already have identified required mitigations. A summary of these comprehensive conditions follow:

- Condition G3: Stanford will meet a no net new commute trips standard
- Condition G9: If Stanford does not meet the no net new commute trip standard for any 2 out of 3 years, it will contribute funding for its proportional impacts at 15 intersections.
- Condition G10: If a neighborhood traffic study (of "cut-through traffic") is initiated by a local jurisdiction, Stanford will participate in the study
- Condition G11: Certain projects will require project-specific traffic studies
- Condition H2: Stanford will allocate funding of \$100,000 to the City of Palo Alto for a residential parking permit program

This memorandum outlines a proposed methodology for defining the scope of project-specific traffic studies required under Stanford GUP Condition of Approval G11. The scoping process recognizes that the project-specific traffic studies for projects that are fully consistent with the assumptions used in completing the 2000 GUP EIR should be limited to evaluation of site-specific impacts that were not previously addressed in the Program EIR (such as site access and safety). On the other hand, projects that could result in a substantially different trip distribution than evaluated in the 2000 GUP EIR, or that could substantially increase overall traffic beyond that evaluated in the 2000 GUP EIR, should receive a more detailed level of analysis. This more-detailed analysis, if warranted, would be documented in the project-specific traffic study, and would include analysis of intersection congestion. This memorandum describes the methods to be used for applying Condition G11 to future Stanford development. It defines: 1) applicable projects, 2) the intent of the Condition regarding the potential impacts of such projects, and 3) the methods through which the impacts of potential concern under Condition G11 should be examined. This memorandum is meant to be a guidance document that can evolve over the life of the 2000 GUP.

Projects Triggering Condition G11

The following Stanford GUP projects will require project-specific transportation studies under Condition G11.

- Projects specifically defined as items (a) through (f) in the Condition. This includes: additional housing in Escondido Village exceeding 100 units, West Campus and Lagunita faculty/staff housing development, basketball arena expansion or replacement, performing arts center, Stanford Avenue faculty/staff housing, parking lots or structures with a net increase of 400 spaces or more, and
- Projects of similar size and scale to those listed above. This includes: new or enlarged event venues that would result in peak hour traffic generation equal or greater than that of the basketball arena (assumed 12,000 seats) or performing arts center (1,500 to 1,800 seats in main hall and two smaller halls of 200 and 800 seats), or housing projects of more than 100 units near the border of campus.

Projects that would relocate academic square footage, housing units, and/or parking to districts beyond the level of development contemplated in the GUP.

Need to justify how 400 spaces or 100 housing units was determined. A preferred measure would be an equivalent number of vehicular trips instead of parking spaces or unit counts. These levels of development would easily trigger CMP review criteria alone. The City requests that a "trigger" of 50 peak hour trips be used to consistently and transparently address impacts.

As described below, the site-specific traffic study for projects meeting these criteria would include both: 1) an analysis of localized vehicular, bicycle and pedestrian access operations and safety, and 2) a screening analysis to determine whether the project might result in new or substantially more severe impacts on intersections than the impacts identified in the 2000 GUP EIR. If the screening analysis finds possible new or substantially more severe

intersection impacts than were disclosed in the 2000 GUP EIR, then a detailed intersection impact and mitigation analysis will also be prepared.

Academic projects not meeting any of the above criteria would not be subject to project-specific traffic studies under Condition G11. As discussed above, the traffic impacts of academic projects in the core of the campus have been assessed in the programmatic 2000 GUP EIR. In addition, traffic impacts are not dependent on the location of academic projects, because the occupants of these buildings will travel to parking areas, not to the buildings themselves, and large parking areas are subject to Condition G11. In addition, the County's design review procedures address pedestrian, bicycle, delivery and vehicular access safety and efficiency for academic projects.

Intent of Condition G11

Condition G11 was imposed to address two potential situations: I.) projects that could increase congestion if new driveways would slow passing traffic, or would conflict with pedestrians and bicycles using bicycle paths, and II.) projects differing substantially from the assumptions in the 2000 GUP EIR, such that they would necessitate possible re-evaluation of GUP off-site impacts at the intersections previously studied in the 2000 GUP EIR.

I. The first concern was that, at a more micro-scale than the program-level issues addressed in the GUP EIR, a specific development project could affect conditions at individual site access points or along frontages at or near (i.e. within 1/4 mile) the project site. For example, in the case of EV 5/6, new traffic using the Escondido Village driveways could potentially slow passing traffic on Stanford Avenue or could conflict with pedestrians and bicycles using the adjoining bicycle path. To address this concern, Condition G11 calls for analysis of the effects within a project site, at project driveways, along project frontages, and at crossings up to about 1/4 mile of the site. Such an analysis typically covers project design details related to operations and safety of driveways, parking lots, access-point dimensions and access controls, emergency access, loading areas for passengers and material deliveries/ pick-up, street frontages, on-street parking/ loading, and bus stops. It also addresses bike lanes, bike racks and storage, sidewalks, and paths adjacent to and near the project site. This type of study will be performed for all projects subject to Condition G11.

II. The second concern addressed by Condition G11 is that the scale or location of a specific building or parking lot could change relative to the GUP EIR assumptions, so that GUP traffic could exceed the EIR's projection of buildout GUP traffic at EIR intersections. In addition, large-scale special event projects could create off-peak traffic impacts that were

not analyzed in the GUP EIR. To address these concerns, the Condition calls for a project-specific traffic study to:

- A. assess whether the characteristics of each applicable project might cause impacts at a GUP EIR intersection in excess of what the GUP EIR predicted would occur, and
- B. if additional significant impact might reasonably occur, to quantify the impact and, if significant, identify appropriate mitigations.

Procedure for Defining Study Scope and Content

I. Localized Access and Circulation Studies

Localized access and circulation studies will address traffic, transit, pedestrian and bicycle safety and efficiency within a project site, at project driveways, along project frontages, and at crossings up to about 1/4 mile of the site. The analysis will cover project design details related to operations and safety of driveways, parking lots, access-point dimensions and access controls, emergency access, loading areas for passengers and material deliveries/ pick-up, street frontages, on-street parking/ loading, and bus stops. It will also address bike lanes, bike racks and storage, sidewalks, and paths adjacent to and near the project site. Analysis methods will involve application of relevant County, City and/or Caltrans design standards, and techniques described in AASHTO and the Highway Capacity Manual. Stanford will submit the proposed scope of work to the County for comment prior to commencing the study. Stanford will also identify the proposed source of design standards and analysis techniques to be applied to the particular situation, for County acceptance prior to the study.

II. GUP EIR Intersection Impacts

Stage A: "Screening" Analysis

The Condition is fairly explicit on the methods for determining whether any excess impacts could reasonably be expected. However, to assure concurrence on assumptions and methods, Stanford will re-confirm the study scope with the County prior to initiating any Stage A analysis. This will include the assumptions on completed GUP projects to be included in the running-total cumulative analysis.

In general, the Stage A study scope will address the following.

Add 3. Whether local traffic conditions have changed substantially that differing impacts of the project could be reasonably expected.

1. Whether the project type and scale is similar to the examples listed as (a) through (f) in the Condition, *and*
2. Whether trip distribution analysis indicates that the location or size of the applicable project would differ substantially from the assumptions in the GUP EIR in a manner that would increase the expected amount of GUP buildout traffic at one or more GUP EIR intersection(s).



Each screening analysis report will contain a cumulative running total, by campus planning area, of the parking spaces created and removed under the GUP, and the number and type of housing units constructed under the GUP. These running cumulative totals will be compared to the area-specific buildout housing and parking totals assumed in the GUP EIR. If the running total exceeds the GUP EIR buildout total in any area, Stage B impact analysis will be conducted to determine the potential effects on EIR intersection(s).

This type of screening analysis should be performed for each project subject to Condition G11 in the site-specific traffic study. If a Stage A "Screening" analysis indicates that a specific project would raise the level of GUP parking or housing in any area of campus to a level greater than anticipated in the GUP EIR, then a Stage B analysis of the impact significance and mitigation would become necessary.

Stage B: Impact Assessment and Mitigation Approach

Like each Stage A report, each Stage B analysis report will contain the cumulative running total of parking spaces, housing and the student, faculty and staff population used to calculate project trip generation. It will compare those figures to the assumptions in the GUP EIR used to calculate trip generation and trip distribution. Each report will indicate the number of trips that the applicable project would add to each GUP intersection as well as the cumulative running-total of other GUP projects approved to date, using the same trip generation and distribution methods used in the EIR. The running cumulative trip total for each intersection will be compared to the GUP buildout trip total as reported in the GUP EIR. If the current total exceeds the GUP EIR buildout total at any EIR intersection, further Stage B impact analysis will be conducted at the affected intersection(s).

During the life of the 2018 GUP, it is expected that state law changes will result in modifications to the standards of significance, analysis methods and mitigation selection with regard to transportation and potentially GHG and Air Quality analyses. The conditions and required follow up analysis should acknowledge that these conditions may necessitate evolution of standards of significance, analysis methods and mitigation selection over time.

For consistency with the 2000 EIR, the further Stage B analysis will adhere to the established CEQA criteria for standards of significance, analysis methods, and mitigation selection.

Stanford will prepare a draft scope of work for the Stage B project-specific traffic analysis and submit it to the County for review and comment. The scope will adhere to the following guidelines:

1. For housing and parking projects, the assessment of traffic impacts at GUP intersections will use the same peak periods and same horizon year as used in the 2000 GUP EIR. The Condition G11 analysis will focus on the commute traffic peak periods, consistent with the 2000 GUP EIR. For special-event projects, such as the - performing arts center, whose specific peaks would occur outside the normal area-wide traffic peaks studied in the 2000 GUP EIR, event-related time periods would also be addressed. -
2. The assessment of traffic impacts at GUP intersections will use the same assumptions concerning changes in non-GUP background growth as used in the GUP EIR, unless new information shows a substantial increase or decrease in background traffic levels relative to those assumed for 2010 in the 2000 GUP EIR.
3. Once any changes in background assumptions necessitated under Step 2 have been taken into consideration, the amount of project-specific traffic at any 2000 GUP EIR intersection will be added. The resulting traffic will only represent a new significant impact if, when added to traffic from other already-approved GUP projects, the cumulative running-total GUP impact exceeds the threshold of significance stated in 2000 GUP EIR.
4. Mitigation required for any new significant impact would first look to the ability of mitigations already identified in the 2000 GUP EIR to mitigate the impact to less-than-significant, including both EIR-listed intersection modifications and "no net new commute trip" accomplishment.
5. Any mitigation required beyond measures already identified in the GUP EIR would include two alternative approaches: further intersection modification and further reduction in commute-trip generation.

Stanford will also meet with County as necessary to discuss and refine the proposed scope of work and will obtain County approval before proceeding with the study.

This criteria should specify how new information should be considered. The City requests that traffic levels anticipated as part of background projects be quantified and existing traffic levels be verified with new traffic counts. At a minimum, critical gateway intersections including El Camino Real/Sand Hill Road and Sand Hill Road/Santa Cruz Avenue should be monitored to determine changes in the vicinity of the campus to the Menlo Park border.

If further reduction in commute-trip generation is allowed, the City requests the County ensure that such programs reduce trips directly in the impacted corridors to mitigate impacts.

Other impacted jurisdictions should also be consulted on the scope.

Summary

Condition G11 specifies which projects will require project-specific traffic studies. Project-specific traffic studies will include 1) localized circulation impacts, and 2) screening analysis of whether there might be additional significant impacts beyond those identified in the 2000 GUP EIR. If screening analysis indicates changes in total GUP trip distribution compared to the EIR, then a re-analysis of impacts will be undertaken at affected intersections, using 2000 GUP EIR methodology, to determine whether significant impacts would result and to identify mitigations.

Stanford will prepare a scope of work for any project-specific traffic study and review it with the County and its consultant prior to beginning work.

The City requests that the relevant approval body be specified. Consistent with the request outlined in the City's comment letter, the City requests that the Board of Supervisors must consider any relocation of development to different districts within the campus.

5.2.1.4 Responses to Comments from City of Menlo Park

- A-MP-1 Each of the specific issues raised by the comment in this letter are addressed in the individual responses to the comments that follow. See also Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation.
- A-MP-2 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity.
- A-MP-3 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.
- A-MP-4 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity.
- A-MP-5 The comment states that any transfer of development should involve notice to and consultation with the City of Menlo Park. The County acknowledges the City’s concerns about such transfers. The County will address this concern during development of Conditions of Approval to address the reallocation of development area between development districts.
- A-MP-6 The comment refers to the City’s proposed revisions to condition of approval G11 of the 2000 GUP. Please see Response to Comment A-MP-11, below.
- A-MP-7 Please see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.
- A-MP-8 Please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study; and Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.
- A-MP-9 Draft EIR Table 5.12-9 in Section 5.12, Population and Housing provides detail on all segments of Stanford affiliates that would increase under the proposed 2018 General Use Permit, including students, faculty, staff, and other workers (including casual, contingent, temporary employees, non-employee academic affiliates, and third-party contractors, including construction workers). Draft EIR Table 5.12-10 describes the net increase in Stanford population residing on the Project site under the proposed 2018 General Use Permit, including undergraduate students, graduate students (including non-student spouses and children), and faculty and staff (including other family members). All appropriate segments of the Project population are accounted for in the Draft EIR impact analyses. Please see the impact sections for each environmental topic for how the increases in Project population were addressed. See also Master Response 9: Population and Housing Methodology and Calculations.

A-MP-10 Responses to each item are provided below.

Item a: Regarding the request to prohibit an increase in net new parking spaces, please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions.

Item b: The suggestion to construct a new roadway from I-280 to Stanford is addressed in Master Response 9: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives. For reasons explained in that Master Response, constructing a new roadway is not an alternative to the project as a whole, and is not preferable to the mitigation measures identified in the Draft EIR. The suggestion to require traffic to use Page Mill Road over Alpine Road is infeasible. The County of Santa Clara cannot prevent drivers from accessing public streets in other jurisdictions.

Item c: The cordon boundary was developed in 2001 to measure trips to and from the campus as envisioned by the Stanford Community Plan. Under the proposed 2018 General Use Permit, Stanford does not propose development in the San Juan Development District. New development in the San Juan Development District, if any occurs, would be subject to applicable zoning restrictions and County review processes, which may include modifying the cordon boundary. Similar to the 2000 General Use Permit, Stanford anticipates very little growth in the Lathrop Development District. The Draft EIR Figure 3-8 on page 3-21 shows that 20,000 net new square feet of academic and academic support space are anticipated in the Lathrop Development District. That small amount of new space would generate very few new peak hour trips. Figure 3-8 also shows that Stanford does anticipate constructing 200,000 net new square feet of academic and academic support facilities and 550 new housing units in the Quarry Development District. Cordon locations, such as driveway counts could be added to address trips to and from the Quarry Development District.

The Quarry Development District is included in the annual traffic monitoring under the 2000 General Use Permit by directly counting the parking lots in the District, and removing hospital trips via a parking permit survey. This method is used because moving the roadway count out to encompass the District would capture trips to and from the shopping center and the medical center, which would be difficult to screen out. If and when the construction of new housing in the District occurs, the monitoring would continue to count the parking access points, and attribute those trips solely to the University.

Item d: Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for discussion of the trip credits and boundaries in the context of the no net new commute trips policy.

A-MP-11 The comment requests that (i) traffic studies be prepared for changes to the amounts of development within each development district; (ii) transfers of

development between development districts be approved by a 4/5 the County Board of Supervisors, including the District 5 Supervisor; and (iii) project-specific traffic studies be prepared for all projects generating over 50 peak hour trips.

With respect to items (i) and (iii) of the comment, please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals. Regarding item (ii), this is a policy issue for the County Board of Supervisors to consider when it considers whether, and under what conditions, to approve the Project.

- A-MP-12 Please see Master Response 13: Transportation and Traffic, Topic 2: Existing Intersection, Freeway Ramp, and Freeway Mainline Conditions for a discussion of the modeling tools used to evaluate existing traffic conditions on study area roadway facilities. Further, as described in Appendix TIA-REV Part 2 (p. 39) field observations were used to calibrate the model to match field conditions for ramps.
- A-MP-13 The Draft EIR, pages 5.15-13 through 5.15-24, presents existing congestion conditions at intersections, freeway segments and ramps within the applicable study boundaries. The County of Santa Clara follows the VTA TIA Guidelines to model and represent intersection, ramp and freeway conditions. The VTA TIA Guidelines require use of the Traffix 8.0 model. The TIA prepared for the proposed 2018 General Use Permit and the results presented in the Draft EIR reflect the inputs and outputs from the Traffix model. Please see Master Response 13: Transportation and Traffic, Topic 2: Existing Intersection, Freeway Ramp, and Freeway Mainline Conditions for additional discussion of the modeling tools used to evaluate existing traffic conditions on study area roadway facilities.
- See also Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation for the conditions under which recirculation of the Draft EIR is warranted. Recirculation is not warranted because this comment did not result in significant new information being added to the EIR; for example, it did not result in the identification of additional significant traffic impacts requiring mitigation.
- A-MP-14 The Draft EIR pages 5.15-13 through 5.15-24 presents existing congestion conditions at intersections, freeway segments and ramps within the applicable study boundaries. The VTA TIA Guidelines require calculation of freeway conditions based on density calculations that the VTA performs bi-annually. These density calculations are not performed for freeway segments in San Mateo County. Therefore, existing conditions calculations service levels for freeway segments in San Mateo County were based on the 2015 C/CAG Level of Service and Performance Measure Monitoring Report.² Please see Master Response 13: Transportation and Traffic, Topic 2: Existing Intersection, Freeway Ramp, and

² See <http://ccag.ca.gov/wp-content/uploads/2015/10/2015-San-Mateo-Monitoring-Report-091415.pdf>.

Freeway Mainline Conditions for additional discussion of the modeling tools used to evaluate existing traffic conditions on study area roadway facilities.

See also Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation for the conditions under which recirculation of the Draft EIR is warranted. Recirculation is not warranted because this comment did not result in significant new information being added to the EIR; for example, it did not result in the identification of additional significant traffic impacts requiring mitigation.

- A-MP-15 The commenter is referred to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.
- A-MP-16 The commenter suggests that the County establish daily trip limits to address the Project's air quality and greenhouse gas impacts. The Draft EIR concluded that the Project would not have significant air quality impacts related to development operations, which include operational traffic from daily Project trips (Impacts 5.2-4, 5.2-6, and 5.2-9). The Draft EIR also concluded that the proposed Project would not result in a net increase in campus-wide greenhouse gas emissions over that generated in the 2018 environmental baseline (Impact 5.7-1). The Project's potentially significant greenhouse gas impacts related to consistency with plans, policies and regulations adopted for the purpose of reducing the emissions of greenhouse gases (Impact 5.7-2) would be mitigated to less than significant levels through implementation of measures that include Mitigation Measure 5.15-2.³ Because the Project would not make a cumulatively considerable contribution to air quality and greenhouse gas impacts, it is not necessary to impose daily trip limits as additional mitigation.
- A-MP-17 As discussed on page 5.15-13 of the Draft EIR, the Level of Service methodology used to evaluate traffic impacts identifies the highest single hour within the morning and evening peak periods to represent the worst-case condition within the peak period and includes all traffic in and out of a study intersection, including those vehicles traveling in the reverse commute direction. The traffic volumes evaluated at study locations during the peak hour and period include all vehicles and all approaches, and therefore capture the potential effects of vehicles traveling in the peak commute direction as well as those travelling in the reverse commute direction. By evaluating the worst condition within the peak period, the analysis ensures that the maximum effect of the proposed Project is identified, and if mitigation is warranted, that the mitigation is designed to

³ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

With respect to the comment that suggests that the no net new commute trips program is not adequate because trip monitoring is limited to commute direction trips, please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis conducted to address the impact of reverse-commute direction trips, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.

It should be noted that Mitigation Measure 5.15-2(b) has been included to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

See also Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation for the conditions under which recirculation of the Draft EIR is warranted. Recirculation is not warranted because this comment did not result in significant new information being added to the EIR; for example, it did not result in the identification of additional significant traffic impacts requiring mitigation.

A-MP-18 The applicable eight weeks per year were identified during development of the baseline traffic count methodology, as these eight weeks represent when Stanford is in regular session and reflect the normal patterns on the campus. Because Stanford is an academic use, rather than an office use like Facebook, the patterns on campus fluctuate during the calendar year. Maintaining a consistent approach to taking traffic counts enables the County to compare each year's counts to the baseline counts.

Using license plate readers to conduct the cordon monitoring at Stanford would be complicated given the varying terrain and locations of the cordon gateways. Facebook by contrast has a limited number of driveways, with no pass-through trips. The potential use of an automated counting mechanism is being investigated, and may be implemented if and when a feasible approach has been identified.⁴

A-MP-19 The annual traffic monitoring reports that are prepared by the County are available on the County's website.⁵ These documents provide the raw cordon data and Marguerite ridership by route that was used to apply for credits.

⁴ See Appendix TRF-MISC in this Response to Comments Document.

⁵ Please see <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Docs.aspx>.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion of trip credits and cordon boundaries in the context of the no net new commute trips policy. As illustrated in Figure MR13-7, the number of vehicles entering and exiting the campus on a daily basis has not increased during implementation of the 2000 General Use Permit. These data indicate that an increase in trips to and from the Stanford campus has not contributed to increases in daily trip volumes on surrounding roadways. On Sand Hill Road, an increase in traffic volumes from 1998 to 2017 would have been due in part to construction of several projects in the early 2000s which included additional residential units along this corridor and the extension of Sand Hill Road to El Camino Real.⁶ Employment and residential growth at a variety of sites throughout Menlo Park and Palo Alto would also account for increases in volumes on this major arterial. Section 5.4 of Appendix TIA-REV in this Response to Comments Document further explains how growth generated by local and regional commercial and residential development is accounted for in the traffic forecasting process for study area roadways.

A-MP-20 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for information regarding mitigation of intersection impacts and fair share contributions, and Topic 6: No Net New Commute Trips Standard for information on the penalty for non-compliance with the no net new commute trips standard.

A-MP-21 Draft EIR Mitigation Measure 5.15-2 includes a process for establishing a fair share contribution towards improvements at adversely affected intersections and roadways if Stanford does not achieve the no net new commute trips standard. The County Planning Office will determine priorities for use of such a fee in consultation with other affected jurisdictions. The City of Menlo Park's suggested priorities will be considered during this process. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for information regarding mitigation of intersection impacts and fair share contributions, and Topic 6: No Net New Commute Trips Standard for further information on use of the fair share contribution.

A-MP-22 The City's request that penalties be assessed for noncompliance with trip reduction goals is noted. Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for information regarding

⁶ See https://www.paloaltoonline.com/weekly/morgue/news/1999_Jan_27.SANDHLL.html.

mitigation of intersection impacts and fair share contributions, and Topic 6: No Net New Commute Trips Standard for detail on the fair-share impact fees that would apply if the no net new commuter trips standard is not met.

A-MP-23 Consistent with standard practice for impact fee-setting and program administration, the fair share contribution will be calculated using cost estimates for the proposed mitigation measures in current-year dollars, and the fee will be escalated using a yearly escalation rate based on local construction cost data. Mitigation projects for which other agencies have prepared cost estimates that already include escalation will be separated out and added to the fee separately, using the Project's fair share contribution.⁷ See Mitigation Measure 5.15-2 in the Draft EIR.

The Draft EIR acknowledges that sufficient funds may not be obtained from other entities contributing to impacts at the affected intersections to cover the full costs of constructing the intersection improvements and, thus, concludes that Impacts 5.15-2 and 5.15-9 are significant and unavoidable (see pages 5.15-90 through 5.15-91 and 5.15-123). Further, to the extent Stanford achieves the no net new commute trips standard, its fair share responsibility for contributing to intersection improvements will be diminished.

A-MP-24 Draft EIR Section 5.0, Introduction to Environmental Analysis, discusses notable near-term development within the Project site and nearby that were either completed since release of the NOP in January 2017, or for which construction is either currently underway or starting soon and expected to be largely completed by Fall 2018 (Appendix CON, Tables 1 and 2). This information was presented to provide context for the physical changes and near-term cumulative construction effects on the Project site and vicinity that occurred between existing and 2018 baseline conditions, but was not used as the basis for the forecasting traffic growth in the Transportation section of the Draft EIR. Please also note that the Stanford Redwood City campus was not included in Table 2 in Appendix CON, as that campus is not near the Project site. However, the Stanford Redwood City campus is included in the 2035 Cumulative Model used to evaluate transportation impacts of the Project.

Please also see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how the travel demand forecast for growth outside the Project site was developed for the Draft EIR, including for the Stanford Redwood City campus. As discussed in that master response, there are no pending or approved projects for the expansion of Stanford Shopping Center Expansion listed on the City of Palo Alto's website. See also Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach to 2018 Baseline Environmental Setting, Topic 2 Approach for Cumulative Scenario, and Topic 3: Consideration of Non-Project Stanford-

⁷ See http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/tisguide.pdf (see page 13 of the Caltrans Guidelines).

Related Development Outside General Use Permit Boundary, for a discussion of how the cumulative impact scenario was developed.

- A-MP-25 Please see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how travel demand forecast for growth outside the Project site was developed for the Draft EIR.
- A-MP-26 The forecasts for land uses outside the Project site were prepared using the VTA-C/CAG Travel Demand Forecasting model. As part of the forecasting process, the model's assumed land uses within the cities surrounding the campus were checked to ensure they reflected growth associated with approved and pending projects, such as the Stanford University Medical Center (SUMC) Renewal and Replacement Project. For the traffic analysis zone containing the SUMC, the existing land uses were increased by 4,000 jobs, to 12,700 total jobs, to better-reflect existing conditions. No adjustment was made to the VTA model's jobs growth projection for the traffic analysis zone containing the SUMC because the jobs growth projection in the VTA model is higher than the growth projected by the SUMC Renewal and Replacement EIR, and therefore the VTA model is conservative.
- Please see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how travel demand forecast for growth outside the Project site was developed for the Draft EIR, including for the SUMC.
- A-MP-27 Please see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information about the travel demand forecasting process.
- A-MP-28 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, which addresses intersection improvement funding/implementation if the no net new commute trips standard is not achieved, and Stanford's fair share contributions.
- A-MP-29 Table 5.15-19 on page 5.15-75 of the Draft EIR shows that under 2018 Baseline conditions, the I-280 Northbound Off-ramp/ Sand Hill Road intersection (Intersection #2) would operate at unacceptable LOS F conditions. While the proposed Project's contribution to an impact at this intersection would be significant, the Project alone would not cause the unacceptable conditions at this intersection. Under these circumstances, it is appropriate for a project to make a fair share contribution toward intersection improvements rather than fully fund or construct such improvements. Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation. In addition, the comment states that TIA Part 2 refers to a protected bicycle lane at the intersection, on page 172. This is incorrect. The reference is to a protected right-turn lane.

- A-MP-30 The Draft EIR does not identify any significant impacts from the proposed Project at intersections on El Camino Real under 2018 Baseline with Project conditions. Table 5.15-29, commencing on page 5.15-113 of the Draft EIR identifies 2035 Cumulative with Project conditions. That table shows that the proposed Project would make a cumulatively considerable contribution to five intersections on El Camino Real (Intersections #20, 37, 38, 41, and 48) under 2035 Cumulative with Project conditions. Please see Response to Comment A-MP-28, above.
- A-MP-31 The purpose of the Draft EIR is to evaluate the Project's impacts on the environment, not remedy existing gaps or other deficiencies in such facilities. The proposed Project encompasses only Stanford land in unincorporated Santa Clara County that the County has land use jurisdiction over. It is not within the required scope of the EIR impact analysis to assess existing bicycle and pedestrian facilities across all Stanford properties to determine whether there are existing gaps, as is requested in the comment. The applicable significance criteria for impacts to bicycle and pedestrian facilities, which are identified on page 5.15-54 of the Draft EIR, are whether the Project would:
- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit; or
 - f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
- The Draft EIR analyzes the Projects impacts with respect to bicycle and pedestrian facilities under Impact 5.15-8 (pages 5.15-111 and 5.15-112), and finds that the Project would result in a less-than-significant impact to such facilities.
- Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis, and Topic 12: Transit and Bicycle Capacity for information on the Draft EIR's bicycle and pedestrian analysis, which complies with CEQA requirements.
- A-MP-32 The proposed Project does not include infrastructure improvements that would interfere with offsite existing or planned bicycle facilities. The mitigation measures proposed for three intersections along El Camino Real in Menlo Park (at intersections #37, #38 and #41) involve converting the northbound right turn lane at each intersection to a shared through-right lane. The discussions of the impacts of these mitigation measures on bicycle quality of service is included in Draft EIR Mitigation Measure 5.15-9, and Appendix TIA-REV (TIA Part 2, in Section 8.1.3, and Table 8-2), which describe how the mitigation measures could be constructed to accommodate bicycle lanes.

Please see Chapter 2 in this Response to Comments Document for updated and corrected text with regard to the potential bicycle lanes along El Camino Real that are described in the El Camino Real Corridor Study.

A-MP-33 Please see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for a discussion of bicycle and pedestrian safety.

A-MP-34 Please see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for additional detail on the methodology used to identify and evaluate neighborhood streets, including selection of the TIRE methodology for neighborhood street impact assessment. Note that traffic impacts on arterial and certain collector roadways are assessed using peak hour intersection level of service, as opposed to the neighborhood street impact assessment method. The Willows and Belle Haven neighborhoods were not identified for neighborhood street impact assessment based on the projected level of Project traffic using adjacent major roadways (primarily Willow Road) and the potential for diversion to local streets based on comparable travel times given trip lengths, speed limits and traffic controls. The comment notes projected trip diversions to Lytton Road and Hamilton Road within the Crescent Park neighborhood (76 daily trips and 145 daily trips, respectively) and states that some of these trips could use Willows neighborhood streets via the Pope-Chaucher bridge. The percentage of these potential diverted trips which would choose routes through the Willows neighborhood on local streets is considered very low, given that during most of the day, the comparable travel times on higher-speed, more direct roadways are shorter, so potential for diversion typically occurs only during the peak hours.

A-MP-35 Mitigation Measure 5.15-2 describes the process that the County of Santa Clara uses to approve trip reduction credit programs proposed by Stanford. Presently, Stanford has not requested and does not receive credits for trip reduction programs or improvements designed to reduce trips to or from 500 El Camino Real or 2131 Sand Hill Road. If Stanford were to apply for such trip reduction credits in the future, the County would review the proposal to confirm that it is not duplicative of an existing regulatory requirement. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion of trip credits in the context of the no net new commute trips standard.

A-MP-36 Please see Response to Comment A-MP-10, item c, above.

- A-MP-37 The County Board of Supervisors, as the decision-making body for the 2018 Stanford General Use Permit, will determine any in-lieu fee paid by Stanford for affordable housing demand generated by its academic development and is not bound by the \$20 fee proposed by Stanford. Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- A-MP-38 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA.
- With respect to the comment’s request for more housing, please note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.
- A-MP-39 Impacts of the Project on housing supply is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Nevertheless, on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which included a new impact (Impact 5.17-1) that discussed the indirect impacts of off-campus housing associated with the Project. The Recirculated Portions of Draft EIR also included two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.
- Please also see Master Response 10: Affordable Housing, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.
- A-MP-40 Please see Master Response 9: Population and Housing Methodology and Calculations.
- A-MP-41 Consistent with professional practice, air quality and greenhouse gas analyses in the Draft EIR incorporate emissions from the additional vehicle trips and vehicle miles traveled associated with the Project. The times of the day that these trips take place does not impact the annual emissions estimates, as the emission factors are based on Santa Clara County aggregated trip data for the calendar

year (as explained in Draft EIR Appendix VMT). Consequently, peak traffic spreading would not affect any analysis or conclusions regarding the significance of air quality and greenhouse gas impacts in the Draft EIR.

A-MP-42 The Draft EIR adequately analyzed all significant site-specific air quality effects of the proposed Project to on- and off-site sensitive receptors, such as residential uses and day care centers, including localized increases of construction-related fugitive dust (Impact 5.2-2), and construction and operational health risks associated with increase in emissions of TACs and PM_{2.5} (Impacts 5.2-3 and 5.2-5). Figure 5.2-1 is revised to illustrate both on- and off-site sensitive receptors. Please see Chapter 2 in this Response to Comments Document for the revised Figure 5.2-1.

As addressed in Impact 5.2-2, implementation of Mitigation Measure 5.2-2 (BAAQMD Best Management Practices for Controlling Particulate Emissions) would ensure that localized fugitive dust emissions generated during construction of projects under the proposed 2018 General Use Permit, and associated effects on both on- and off-site sensitive land uses, would be reduced to a less-than-significant level.

As addressed in Impact 5.2-3, a screening tool was developed as part of the health risk analysis conducted in support of the proposed 2018 General Use Permit to ensure future construction activities would not result in emissions of toxic air contaminants exceeding BAAQMD health risk significance thresholds. The screening tool was developed because the locations of individual projects under the proposed 2018 General Use Permit are not known, including those of future childcare centers, and thus, it is not possible to conduct a health risk assessment (HRA) for construction for individual projects that would occur under the Project. Table 5.2-8, on page 5.2-34 of the Draft EIR presents the screening distances developed to determine the circumstances in terms of construction project size and distance from receptors under which a significant construction-related health risk may occur. Childcare centers are presented as the first receptor site. Any existing or future childcare center would be held to these screening criteria. If applicable, Mitigation Measure 5.2-3(b), would require a project-specific health risk analysis to demonstrate that the project construction activities would not result in a significant acute, chronic non-cancer or cancer-related health risk to specific sensitive receptors. Implementation of Mitigation Measures 5.2-3(a)-(b) would ensure potential exposure of both on- and off-site sensitive receptors to substantial pollutant concentrations or health risk from construction activities under the Project would be less than significant.

As addressed in Impact 5.2-5, implementation of Mitigation Measure 5.2-5 (Laboratory Fume Hood Emission Control) would be required for laboratory projects proposed over a certain size. For those projects, Stanford would be required to conduct a health risk screening analysis and obtain a permit from the BAAQMD for the proposed individual project. In accordance with BAAQMD

Rules 2-1 and 2-5, new sources of emissions must implement Best Available Control Technology for Toxics (T-BACT) if individual source risks exceed 1.0 in a million for cancer and/or chronic hazard index is greater than 0.20. Compliance with BAAQMD Rules 2-1 and 2-5 will ensure that new laboratory operations will not result in a significant health risk impact to nearby on- and off-site sensitive land uses.

See also Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity.

- A-MP-43 Please see the discussion of Impacts 5.11-1 and 5.11-6 in the Draft EIR, which ensure that potential construction related noise impacts (Project and cumulative contribution) at off-site land uses, including residences along Sand Hill Road, would be mitigated to the extent feasible with implementation of Mitigation Measures 5.11-1 (Construction Noise Control Measures and Noise Control Plan for Off-site Receptors). Please see the discussion of Impacts 5.11-4, which ensure that potential operational related noise impacts to off-site uses would be mitigated to a less-than-significant level with implementation of Mitigation Measures 5.11-4 (Shield or Enclose HVAC Equipment and Emergency Generators). Finally, as discussed in Impacts 5.11-5 and 5.11-7, the increases in Project traffic would result in a less-than-significant increase in noise levels, and contribution to cumulative noise levels on off-site roadways, including Sand Hill Road. Consequently, all potential Project noise impacts, including those effects on residential uses on the Sand Hill Road corridor and disclosed and mitigated to the extent feasible in the Draft EIR.
- A-MP-44 Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-MP-45 Please see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-MP-46 Please see Master Response 7: Flooding/Detention, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-MP-47 The Draft EIR determined the proposed 2018 General Use Permit would have no potential impact on public libraries (page 5.13-12). As a major higher education

institution Stanford provides extensive on-campus library facilities and related services to accommodate the library demands of its student, faculty, and staff, and would expand those facilities as needed with development of new academic facilities under the proposed 2018 General Use Permit. Consequently, it is highly unlikely that the increased student and faculty population to be accommodated under the proposed 2018 General Use Permit would necessitate the need for new off-campus public libraries.

The Draft EIR (Impact 5.14-1) also determined there would not be substantial deterioration of public park and recreation facilities associated with increased visitors to those facilities from campus residents under the proposed 2018 General Use Permit. Consequently, the proposed 2018 General Permit would generate a less-than-significant impact to public park and recreation resources.

The commenter notes that adults living on the campus may visit local libraries to access programs such as children's story hours. Such use is not expected to result in physical environmental impacts associated with construction of additional offsite libraries. Use of public facilities alone, even if such use results in crowding, is not an environmental impact under CEQA. On page 5.14-17, the Draft EIR states: "Crowding and increased demand for public facilities and programs alone, absent physical deterioration or new construction or the alteration or displacement of existing parks or recreation facilities on campus, are not considered physical environmental impacts under CEQA."

A-MP-48 CEQA requires that the Lead Agency provide a written proposed response to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report [CEQA Guidelines 15088(b)]. There is no CEQA requirement for public review of the Final EIR. However, it is the County's practice to issue a Notice of Availability of the Final EIR to all interested parties once the document is completed. The County anticipates that the Final EIR will be released in December 2018, well in advance of the first Planning Commission hearing in 2019. Certification of the Final EIR is not anticipated to occur until mid-2019 prior to the County Board of Supervisors considering the project.

Comment Letter A-MPCSD

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Ginny Maiwald

Chief Business & Operations Officer
Ahmad Sheikholeslami

January 31, 2018

From: Menlo Park City School District
181 Encinal Ave.
Atherton, CA 94027

To: County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street,
San Jose, CA 95110

RE: Response to Draft EIR 2018 General Use Permit

Dear Mr. Rader,

Please accept the following comments of the Menlo Park City School District staff with regard to the Draft Environmental Impact Report for the General Use Permit Application of Stanford University.

Menlo Park City School District opposes any additional expansion of Stanford University beyond its current authorized limits that are not fully mitigated with appropriate housing and traffic mitigations.

Any expansion of the University which results in additional employees and students must have full housing mitigation on the University's traditional boundary. Without this mitigation, any expansion will have an adverse impact on Menlo Park City School District. Menlo Park School District is a community funded school district, which does not receive any additional funding for new students. Adequate housing must be included as part of this project for additional staff, employees, and students. If adequate housing is not provided in the University boundary and Stanford rents or purchases homes for staff and/or students and utilizes its tax exemption status, all taxing entities including MPCSD will lose critical funding.

A school district relies heavily on the balance of land uses maintained by the local agencies with planning authority in planning for likely future enrollment. Land that is specified for residential uses is expected to generate both property taxes and potential students; meanwhile, land that is specified in the General Plan for non-residential uses is expected to produce jobs, economic vitality, and property taxes, but no students. Redesignation of land in a jurisdiction's General Plan from commercial, industrial, and institutional land uses to residential or mixed-use land uses imposes a unique impact on school districts, which must then adequately plan for the increases in enrollment that will necessarily follow.

Menlo Park City School District

Every child achieves academic excellence. Every child becomes emotionally and physically stronger.

Every child discovers and grows their talents.

5.2.1-57

Comment Letter A-MPCSD

Families occupying Stanford's housing stock will age in place and utilize the school district's resources without the landowner paying anything approximating the cost imposed on the public resource. The problem is exacerbated whenever the institutional landowner exercises its option to assert the so-called "welfare exemption" to property tax for property that is indisputably residential in character. While Stanford clearly benefits in the labor market from offering housing to its employees and affiliates, those residents become members of the public whose relationship to their public institutions is essentially severed. They, unlike owners or regular renters, contribute less or (in some cases) essentially nothing to the system of property tax that underpins California public institutions. The collection of one-time "developer fees" does little to offset either the facility or long-term operational budget impacts of enrollment increases caused by the conversion of non-residential land to residential and mixed-use development by a landowner who exempts the property from collection of ordinary property tax.

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It is the belief of the Menlo Park City School District that the impacts to school facilities caused by Stanford's proposed development of residential and mixed-use property in formerly industrial, commercial and institutional zoning districts can only be fully mitigated by the ensuring that the additional residential load of Stanford's growth is accommodated on property that is already tax-benefited under the welfare exemption, and not to impose additional residential needs on other lands in adjacent jurisdictions. We ask that the County consider imposing mitigation measures that address the impact to schools caused by the conversion of formerly non-residential land to residential uses by ensuring that the balance between increased enrollment and rising property taxes is not upset by the acquisition of substantial non-residential property by long-term institutional owners whose tenants will consume public resources while their landlords contribute little or nothing by way of property tax, and by ensuring that residential impacts are mitigated on Stanford's current land without encouraging further acquisition and conversion of other lands.

5

In addition to the housing impacts, expansion projects at the University have adversely impacted traffic along major corridors through the School District. Primarily traffic to Stanford University from Highway 101 through Willow Road, from highway 280 through Sand Hill Road, and increased traffic through El Camino Real have impacted the Menlo Park City School District. The additional traffic is resulting in hazardous roadways/intersection impacting our safe routes to schools efforts. The safety of our students walking and biking are adversely impacted by the increased traffic as a result of the proposed increased development. The University must develop measure must fully mitigate any increased traffic levels beyond the current unacceptable levels. These measures should include the funding of crossing guards for local schools at key intersections where traditional transportation mitigation measures fall short.

6

Thank you in advance for considering our deep concerns and ensuring that changes are made to the final approval of the EIR that will alleviate the impact to our community and local schools.

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Sincerely,



Erik Burmeister, Superintendent
Menlo Park City School District

5.2.1.5 Responses to Comments from Menlo Park City School District

- A-MPCSD-1 This comment states conditional opposition to the proposed Project. The Draft EIR and Recirculated Portions of Draft EIR disclose all potential significant environmental impacts of the proposed Project, and identify mitigation measures to reduce all significant impacts to a less-than-significant level, where feasible. Please also see the individual responses that follow.
- A-MPCSD-2 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax assessment issues are governed by state law and are not within the scope of environmental review under CEQA. State law also establishes mitigation for school impacts and preempts local authority on this issue.
- Impacts of the Project on housing and potential funding impacts on taxing entities are socioeconomic issues not required to be analyzed in the Draft EIR or mitigated under CEQA. Nevertheless, on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which included a new impact (Impact 5.17-1) that discussed the indirect impacts of off-campus housing associated with the Project. The Recirculated Portions of Draft EIR also included two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.
- A-MPCSD-3 The Community Plan and zoning amendments proposed by Stanford in connection with the Project are described in Draft EIR sections 3.9 and 3.10. State law establishes mitigation for school impacts and preempts local authority on this issue.
- A-MPCSD-4 As explained above, state law establishes mitigation for school impacts and preempts local authority on this issue. Property tax assessment issues are also governed by state law.
- A-MPCSD-5 The comment is acknowledged. As discussed above, the County elected to evaluate two new housing alternatives under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B will be presented to the County Board of Supervisors along with comments on the Draft EIR to assist in the Board's consideration of whether more housing should be constructed on the Stanford campus. See also Master Response 9: Population and Housing Methodology and Calculations, Topic 3: Off-Campus Households and Household Adjustment Factors.

A-MPCSD-6 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative pedestrian and bicycle safety impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for the discussion of bicycle and pedestrian safety.

A-MPCSD-7 The comment is noted; no response is required.



Menlo Park Fire Protection District

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Fire Chief
Harold Schapelhouman

Board of Directors
Chuck Bernstein
Virginia Chang Kiraly
Peter Carpenter
Robert J. Silano
Robert Jones

February 2, 2018

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street, San Jose, CA 95110
Email: david.rader@pln.sccgov.org

Re: Comments on Stanford University 2018 General Use Permit Draft EIR

Dear Mr. Rader:

The Menlo Park Fire Protection District (District) appreciates the opportunity to provide comments on the Environmental Impact Report (EIR) for the Stanford University 2018 General Use Permit Project (Stanford Project or Project). The District submits these comments as a fellow public agency and provider of fire and emergency services in the area affected by the Project.

The District provides fire and emergency services for jurisdictions adjacent to the Stanford campus including Menlo Park, East Palo Alto, portions of unincorporated San Mateo County, and Atherton. Stanford has buildings and facilities located within the District’s jurisdiction that are served by the District. In addition, the District serves the Stanford Linear Accelerator Center (SLAC) and has a mutual aid agreement with Palo Alto Fire Department which provides fire and emergency services to Stanford. Stanford Hospital is one of the primary destinations for District emergency medical service vehicles.

Since the District is one of the primary fire and emergency service providers in the area, it is critical that the impacts of the Stanford Project on the District be properly analyzed and mitigated. The Stanford Project allows a significant increase in the amount and density of development on the campus. The primary concern of the District is the increase in traffic congestion on emergency access roadways caused by the Project. The increased congestion will adversely affect the ability of the District to respond to emergencies and transport victims to medical facilities. Response time is one of the District’s critical performance standards. The EIR does not analyze the impacts of roadway congestion on the provision of emergency services and response times. In addition, the EIR does not properly analyze the cumulative impacts of development under the Project on all local emergency services providers, including the District. The EIR also should require Stanford to mitigate the impacts of floodwaters and storm water runoff from its development that will create flooding hazards within the San Francisquito Creek Watershed Area. The District has responded to emergencies caused by flooding in this area that have resulted in significant harm to lives and property. The District also believes that Stanford should consult and coordinate with adjacent local agencies, including the District, on its development projects, so that any impacts to the jurisdictions are addressed.

Many of the District’s concerns are shared by the City of Menlo Park and the County of San Mateo as evidenced by those jurisdictions’ respective EIR comment letters. The District joins in the portions of those comments letters

“Excellence In Service”

identified below. The extensive comments of these fellow public agencies demonstrate the significant issues that need to be addressed before Stanford moves forward with its requested approvals for the Project.

Transportation

The Stanford Project will adversely impact all of the primary emergency access routes used by the District including El Camino Real, University Avenue, Willow Road, Bayfront Expressway, Sand Hill Road, Middlefield Road, and Marsh Road. Freeway access and mainlines will also be adversely affected. Many of the impacts are identified as significant and unavoidable in the EIR. Although these adverse impacts are identified, the EIR does not analyze the impacts of this severe traffic congestion on the provision of emergency services. The EIR should specifically analyze the impacts on emergency service routes and evaluate alternative or improved emergency access routes to address impacts. In particular, the EIR should analyze the impacts of roadway congestion on access to Stanford Hospital by the emergency vehicles from the District and other adjacent emergency service providers who transport victims to the Hospital. The main access roads to the Hospital are El Camino Real, Sand Hill Road, and Quarry Lane. The Project also adversely affects the main access road to Sequoia Hospital - Alameda de las Pulgas.

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The EIR should include as a significance threshold the response time standards adopted by local emergency providers to determine the impacts due to traffic congestion caused by the Project and cumulative development. For the District, these standards are the Time Based Performance Standards adopted by the Fire District Board on September 15, 2015. Overall, increased congestion on emergency access routes will adversely affect the response time for emergency vehicles placing life and property in danger.

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In addition, the District is concerned about the mitigation measures included in the EIR to address these adverse traffic impacts. The primary mechanism to address impacts is the “No Net New Trips” Policy. Mitigation requirements only apply if the “No Net New Trips” Policy is not met. However, the accounting and specifics of the Policy are unclear. Also, the District does not agree with the mechanism for implementing Stanford’s fair share contribution to roadway improvements if the mitigation applies for the reasons set forth in the EIR comment letter submitted by the City of Menlo Park. The inadequacy of the mitigation measure also is demonstrated by the fact that almost all of the impacts on roadways remain significant and unavoidable even after the implementation of mitigation measures.

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The District joins in the comments by the City of Menlo Park and the County of San Mateo on the inadequacy of the analysis and mitigation of roadway congestion in the EIR. Those comments are incorporated herein by reference.

Cumulative Impacts on Fire and Emergency Services

The EIR’s cumulative analysis of public services impacts only considers the impacts on the Palo Alto Fire Department. The scope of the analysis only includes the jurisdictional boundaries of the Palo Alto Fire Department. The District should be included in the cumulative impacts analysis. The District’s boundaries border the Stanford campus. The District provides fire and emergency services to properties and occupants of Stanford-owned property located in the District. Emergencies are not limited by jurisdictional boundaries. The analysis of cumulative impacts on fire and emergency services should include the Project’s impacts on the District in addition to the Palo Alto Fire Department. Therefore, the EIR needs to be revised to properly analyze the cumulative impacts and include mitigation measures to address those impacts. The District joins in the County of San Mateo’s comments on the adverse impacts of Stanford’s proposed development on first responders such as firefighters and police.

10

Hydrology and Flooding Impacts

The development under the Stanford Project may result in a significant impact on the San Francisquito Watershed area causing increased flooding. The District has responded to significant emergencies caused by flooding in this area. The District joins in the comments by the City of Menlo Park and County of San Mateo on the need for the EIR to further address this impact and require Stanford to incorporate measures to reduce and detain stormwater on its Property.

11

“Excellence In Service”

Comment Letter A-MPFPD

Inter-agency consultation on Stanford Development Project

The District requests inter-agency notification, coordination and collaboration on campus development to assure the impacts of development on the District and neighboring jurisdictions are considered and addressed. Coordination and collaboration with neighboring jurisdictions will help address issues and alleviate concerns.

12

Conclusion

The Fire District requests that Stanford and Santa Clara County fully consider these comments and revise the EIR to address the concerns raised. The Fire District also requests that the City and Fire District work together to ensure that the Project’s impacts on emergency and fire services are fully analyzed and mitigated.

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Respectfully;

Harold Schapelhouman, Fire Chief

Cc: Fire Board, Staff, Legal and File

“Excellence In Service”

5.2.1.6 Responses to Comments from Menlo Park Fire Protection District

A-MPFPD-1 The comments are acknowledged. The Draft EIR, Section 5.13, Public Services, under Fire Protection and Emergency Services, pages 5.13-1 to 5.13-2, identifies that the City of Palo Alto maintains mutual aid and automatic aid agreements with a number of fire protection providers, including Menlo Park; and that fire protection service for the SLAC is provided under a contract with the MPFPD.

A-MPFPD-2 and A-MPFPD-3

Project impacts to fire protection, emergency medical and/or police protection services, including from increased traffic congestion are addressed in Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5, and Impact 5.13-6; and Section 5.15 Transportation and Traffic, Impact 5.15-1 and Impact 5.15-7.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times and Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts.

With respect to response times, as discussed in Master Response 11, the Draft EIR explains why increased emergency response time is not considered to be an environmental impact that must be mitigated under CEQA; rather, an environmental impact only occurs if such an effect results in the need for construction of new or expanded physical facilities and construction of such facilities will in turn result in a significant adverse environmental impact.

A-MPFPD-4 Cumulative impacts to fire protection, emergency medical and/or police protection services, including from increased traffic congestion is addressed in Section 5.13 Public Services, Impact 5.13-5, and Impact 5.13-6; and in Section 5.15 Transportation and Traffic, Impact 5.15-1 and Impact 5.15-7.

Please see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times, in which cumulative impacts to applicable fire protection and emergency response services are found to be less than significant.

However, it should also be noted that, as described in Draft EIR Section 5.13, page 5.13-1, it is the Palo Alto Fire Department (PAFD), not the MPFPD, that provides fire protection and suppression, and emergency medical service (EMS), for the Project site and Palo Alto.

As identified in Response to Comment A-MPFPD-7, below, while the City of Palo Alto maintains mutual aid and automatic aid agreements with the City of Menlo Park and other cities, the Project site is within the jurisdictional boundaries of PAFD. Therefore, the cumulative analysis provided on p. 5.13-18, which considers increased demand from increased growth and buildout of the

City of Palo Alto emergency response system and facilities, is adequate and appropriately considers cumulative impacts on MPFPD, and no further analysis is required.

A-MPFPD-5 Please see Master Response 7: Flooding/Detention, generally, and in particular, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

A-MPFPD-6 Impacts to fire protection, emergency medical and/or police protection services, including from increased traffic congestion is addressed in Section 15.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5, and Impact 5.13-6; and Section 5.15 Transportation and Traffic, Impact 5.15-1 and Impact 5.15-7.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times, and Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts.

A-MPFPD-7 As noted in Response to Comment A-MPFPD-4, above, it is the PAFD, not the MPFPD, that provides fire protection and suppression, and emergency medical service (EMS), for all areas within the jurisdictional boundaries of the Project site and Palo Alto.

While there may be other land uses owned by Stanford located outside of this jurisdictional boundary, the Draft EIR analysis focuses on the areas most affected by the proposed changes under the 2018 General Use Permit. Therefore, the EIR adequately analyzes emergency response impacts, and no further analysis is required.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times, which explains why delayed emergency response times are not physical environmental impacts that must be mitigated under CEQA.

A-MPFPD-8 Draft EIR Mitigation Measure 5.15-2(6)(b) on pages 5.15-89 and 5.15-90 states that if the cordon counts, as modified by trip reduction credits, exceed the baseline volume by 1 percent or more for any two out of three consecutive years, mitigation of impacts to intersections will be required, implementing Stanford Community Plan Implementation Recommendation C(i)(9).⁸ On page 74, the Community Plan describes Implementation Recommendation C(i)(9) as follows:

⁸ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

If Stanford does not meet the “no net new commute trips” goal for new development on campus, require Stanford’s contribution toward intersection improvements at impacted locations or equivalent funding toward other transportation impact mitigation efforts, to a degree proportional to the effect of the new development on future traffic levels. If Stanford does not either meet the no net new commute trips goal or contribute proportional funding toward intersection improvements or equivalent funding for transportation mitigation efforts, do not grant additional development permits until Stanford meets the established requirements.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net Commute Trips Standard.

- A-MPFPD-9 If Stanford achieves the no net new commute trips standard, it will not contribute trips in the peak hour and peak commute direction to off-campus intersections and freeway segments. The County has determined through independent monitoring that this program has been effective in mitigating the potential transportation impacts of Stanford’s facilities and population growth. The Draft EIR conservatively does not assume that Stanford will achieve the no net new commute trips standard. This is a worst-case approach used to ensure that back-up mitigation measures in the form of physical intersection improvements are identified. As described under Impact 5.15-2 and Impact 5.15-9, many of the intersection improvements would be capable of reducing the impact to a less-than significant level; however, they depend on the actions of agencies that are not the Lead Agency for this Draft EIR (i.e., County of Santa Clara). Further, some mitigations could require additional funding that has not yet been identified and it is not certain that a mitigation measure would be implemented in a timely manner such that the proposed Project’s impact is mitigated. The County of Santa Clara County cannot require Stanford to pay more than its fair share of the cost of intersection improvements.

It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net Commute Trips Standard.

- A-MPFPD-10 The Draft EIR Section 5.13, Public Services acknowledges on page 5.13-2 that the SLAC National Accelerator Laboratory (operated by Stanford on behalf of the Department of Energy), located outside the Project site boundary, is served by the MPFPD.

As identified in Response to Comment A-MPFPD-7, while the City of Palo Alto maintains mutual aid and automatic aid agreements with the City of Menlo Park and other cities, the Project site is within the jurisdictional boundaries of PAFD. Therefore, the cumulative analysis provided on page 5.13-18, which considers increased demand from increased growth and buildout of the City Palo Alto is adequate and no further analysis is required.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

- A-MPFPD-11 Please see Master Response 7: Flooding/Detention, generally, and in particular, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-MPFPD-12 The request is acknowledged. As discussed in the Draft EIR, the PAFD provides fire protection and suppression, and EMS for the Project site. While the MPFPD does not directly serve the Project site, under the proposed Project, it is expected that the City of Palo Alto would continue to maintain mutual aid and automatic aid agreements with its neighboring jurisdictions, including with Menlo Park; and continue to coordinate planning efforts with those jurisdictions, as applicable.
- A-MPFPD-13 The request is acknowledged. The Draft EIR and Recirculated Portions of Draft EIR disclose all potential significant environmental impacts of the proposed Project, and identify mitigation measures to reduce all significant impacts to a less than significant level, where feasible. See also see Response to Comment A-MPFPD-12, above.



Midpeninsula Regional Open Space District

December 1, 2017

David Rader, Senior Planner
County of Santa Clara
Department of Planning and Development
County Government Center
70 West Hedding Street, San Jose, CA 95110

Re: Draft Environmental Impact Report for the Stanford University 2018 General Use Permit

Dear Mr. Rader,

On behalf of the Midpeninsula Regional Open Space District (District), we respectfully submit the following comments regarding the Draft Environmental Impact Report (Draft EIR) for the Stanford University 2018 General Use Permit.

The District owns and manages approximately 63,000 acres of open space land on the San Francisco Bay Peninsula. Our mission is:

To acquire and preserve a regional greenbelt of open space land in perpetuity; protect and restore the natural environment; and provide opportunities for ecologically sensitive public enjoyment and education.

We appreciate Stanford accommodating its development footprint within the Academic Growth Boundary, as proposed by this project and as required by the Stanford Community Plan. The District supports preserving in perpetuity the largely undeveloped, open space Stanford lands that are located outside the Academic Growth Boundary. The long-term preservation of this open space is essential to the health and wellness of the region.

District comments focus on Recreation, where potential environmental impacts may result from increased use of regional trails, open space, and other recreational facilities.

1. **Please include as part of the environmental setting a discussion of planned regional trail connections and other public access improvements** that lie in the wider vicinity of the Stanford campus. Please refer to the District's Board-approved 2014 Open Space Vision Plan. A copy of the Open Space Vision Plan can be viewed at: <http://www.openspace.org/our-work/projects/vision-plan>. Within the vicinity of the Stanford University campus, the Bayfront Public Access Partnership, San Francisquito Creek Restoration Partnership, and the Cooley Landing Nature Center Partnership are priority Vision Plan projects that, once completed, will provide recreational amenities

Comment Letter A-MROSD

Midpeninsula Regional Open Space District
November 28, 2017
Page 2

to the community that include the students, faculty, employees and residents within the Stanford community.

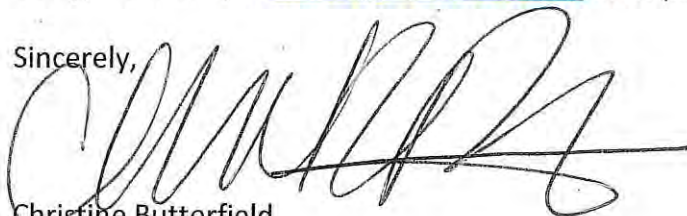
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2. **Please address the status of regional trail projects funded by trail mitigation funds in the County Recreation Fund related to the 2000 GUP in the environmental setting section.** This should include an explicit discussion of remaining trail mitigation funds, future approach and plans for soliciting potential projects for funding.

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We appreciate the opportunity to comment on the Draft EIR for the Stanford University 2018 General Use Permit. Should you have any questions about this letter, please contact Whitney Berry, Planner II, at wberry@openspace.org or at (650) 691-1200.

Sincerely,



Christine Butterfield
Acting Assistant General Manager
Midpeninsula Regional Open Space District

5.2.1.7 Responses to Comments from Midpeninsula Regional Open Space District

- A-MROSD-1 The comments are acknowledged. Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.
- A-MROSD-2 The County acknowledges the importance of the MROSD’s Vision Plan and its contribution to regional trail connections and other public access improvements that will provide new and enhanced regional recreational amenities. The three projects identified in the comment, and their connection to Stanford, are briefly described below.

The MROSD’s Vision Plan describes the Bayfront Public Access Partnership as follows: “Partner to complete gaps in Bay Trail and develop city-to-bay trails. Ensure flood control projects accommodate trail access. Monitor bayfront development proposals to ensure trails and wetland restoration. Support and encourage partner wetland restoration. Collaborate to preserve additional bayfront open space as available.”

The MROSD includes two goals for San Francisquito Creek:

- Regional: Collaborate to restore fish habitat in San Francisquito Creek watershed.
- Peninsula and South Bay Cities San Francisquito Creek Restoration Partnership. Support local agency work to restore stream corridor. Ensure that trails are part of flood protection features.”

MROSD’s Vision Plan overlaps with Stanford’s program to restore fish habitat in the portions of San Francisquito Creek that pass through Stanford lands. One project (improvements to the low-flow crossing at Jasper Ridge Biological Preserve) was completed in 2017, and a second project (removal of the Lagunita Diversion Dam) was constructed in summer of 2018⁹. Stanford is collaborating with local and regional agencies on design of a fish passage solution at Searsville Dam. Stanford also has fulfilled the County of Santa Clara’s requirements pertaining to regional trail connections near San Francisquito Creek.

Further from the Project site, the Vision Plan also describes the Ravenswood Cooley Landing Nature Preserve as follows: “Support East Palo Alto’s Cooley Landing Plan, featuring nature education center focusing on community history and Bay-to-Mountain ecosystems.” This project is quite distant from the Stanford Campus and is unlikely to be impacted by the Project.

The purpose of Section 5.14: Recreation of the Draft EIR is to identify potential impacts to recreational resources. The standards of significance for impacts to

⁹ See <https://news.stanford.edu/2018/01/25/modifications-enhance-fish-passage-san-francisquito-creek/>; <https://headsup.stanford.edu/lagunita-diversion-dam>.

recreation used in the Draft EIR are whether the Project would: (a) increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or (b) include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Draft EIR, p. 5.14-16.) The Draft EIR's approach to analyzing potential impacts to off-campus recreational facilities is described on pages 5.14-17 through 5.14-19.

The Project would not conflict with the priority actions with the MROSD Vision Plan, as described above. Furthermore, as discussed in the Draft EIR the Project would not cause a significant impact to recreational and park facilities (by itself or a cumulatively considerable contribution).

A-MROSD-3 The requested information is not relevant to determining the recreation impacts of the proposed Project. Nevertheless, the following information is provided.

The adoption of the 2000 Stanford University General Use Permit required the adoption of a mitigation monitoring and reporting program (MMRP) that contained two recreation and trail related measures, OS-3A: Improvement of Parks, and OS-3B: Dedication of Trails. These measures are not altered by the proposed 2018 General Use Permit. In addition, the annual reports associated with the 2000 General Use Permit provide a summary of development at Stanford University and required environmental mitigation activity within the unincorporated Santa Clara County. These reports document new projects approved during the reporting period, the status of ongoing projects, and a summary of General Use Permit Conditions of Approval compliance. The most recent report was published June 2018, and addresses the status of development as of fiscal year 2016-2017.¹⁰

¹⁰ Accessed at https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU_2017_AR16.pdf.



COMMUNITY DEVELOPMENT DEPARTMENT • PLANNING DIVISION
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December 12, 2017

David Rader
Santa Clara County Planning Office, County Government Center
701 W. Hedding Street, 7th Floor, East Wing
San Jose, CA 95110

**Re: STANFORD UNIVERSITY 2018 GENERAL USE PERMIT - DRAFT
ENVIRONMENTAL IMPACT REPORT (SCH#2017012022)**

Dear Mr. Rader:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Stanford University General Use Permit (GUP), including the presentation that was made to the City's Environmental Planning Commission on November 1, 2017. The City of Mountain View has the following comments on the DEIR:

1. Transportation & Traffic

Intersection ID No. 83 Charleston Road/San Antonio Road is under the jurisdiction of the City of Palo Alto (not Mountain View) as shown on the tables. 1

Table 1 on Page 5.15-86 notes that the planned closure of Castro Street at the train tracks would mitigate the Project impact for the Central Expressway/Moffett Blvd intersection (Intersection ID No. 89) and lists a back-up mitigation of fair-share funding for an intersection improvement should the Castro Street closure project not be implemented. The planned closure of Castro Street and related improvements (bicycle/pedestrian undercrossing of Central Expressway and a new access ramp from Evelyn Avenue to Shoreline Blvd) are part of the Mountain View Transit Center Master Plan approved by the Mountain View City Council on May 23, 2017. These improvements will be primarily, but not fully, funded by VTA's Measure B Sales Tax Program. 2

The City requests that the fair-share funding allocation planned for the back-up mitigation measure be made available for the Castro Street closure improvements consistent with the DEIR's statement that these improvements will mitigate the Project's significant impact at the Central Expressway/Moffett Blvd intersection. These improvements are also consistent with the priority that the trip fees collected from Stanford be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users. 2

2. No Net New Commute Trips

The City supports the proposal to continue the No Net New Commute Trips required condition for development on campus. The City encourages the Draft EIR to study the ability to reduce 3

David Rader
December 12, 2017
Page 2

commute trips or vehicle miles traveled created by other workers directly or not directly employed by Stanford University (i.e. workforce or contracted staff), instead of trips made only by students, faculty, and staff.

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cont.

3. Affordable Housing Funding Availability

Affordable housing continues to be a primary concern for the region, and the City requests that Santa Clara County maximize the funding collected for housing supply to be distributed not only among students, faculty and staff housing needs, but also for other workers (temporary, casual, part-time, and etc.) that work or will work within the General Plan Use permit area. The City also asks that the County consider allowing a portion of funds for affordable housing projects to be distributed outside the 6-mile radius of campus to allow a larger portion of neighboring jurisdictions to accommodate increased workforce housing demands.

4

4. Historic and Cultural Resources

The City is supportive of Stanford University's proven commitment to maintaining historic and cultural resources with the Academic Growth Boundary, and we encourage that commitment to continue with the General Use Permit 2018.

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5. Rideshare Technology

How does the DEIR address the commuting trips created by private ride-hailing services (i.e. Uber, Lyft, and etc.)? Are these counted as single occupancy trips?

6

6. GUP Outreach

The City applauds Stanford University and the County of Santa Clara for their commitment to giving the public multiple opportunities to comment on the various phases of this project review. The City suggests that expanded translation services be offered at future outreach meetings.

7

If you have any questions, please do not hesitate to contact me at (650) 903-6306 or my staff via email at taryn.toyama@mountainview.gov.

Sincerely,



Randal R. Tsuda, AICP
Community Development Director

CC: Dan Rich, City Manager
City Council
Environmental Planning Commission

5.2.1.8 Responses to Comments from City of Mountain View

- A-MV-1 The comment is noted. Please see Chapter 2 in this Response to Comments Document for the corrected text.
- A-MV-2 The comment is noted. Please see Chapter 2 in this Response to Comments Document. Text has been added to the mitigation measure description for Intersection #89 in Draft EIR Table 1 on page 5.15-86 and to the end of the mitigation discussion for Intersection #89 on Draft EIR page 5.15-134, acknowledging that Stanford will contribute its fair-share funding toward the second southbound left-turn lane from Central Expressway to Moffett Boulevard; and that funding can be used for the Castro Street closure project. See also deletions made to Draft EIR text on Page 5.15-133.
- A-MV-3 All workers are included in the monitoring performed by the County to measure achievement of the no net new commute trips standard. Traffic counts are taken at the gateways to the campus, and there is no distinction as to who is making vehicle trips. As such, other workers, along with visitors, service vehicles and Stanford affiliates are all captured in the monitoring.
- A-MV-4 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.
- A-MV-5 The comment is acknowledged. No changes to Stanford’s existing policies providing protection of historic and cultural resources at the Project site are proposed under the 2018 General Use Permit.
- A-MV-6 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a description of how the EIR addresses commuting trips using ride-hailing services (also known as Transportation Network Companies [TNCs]).
- A-MV-7 The comments are acknowledged. The outreach meetings are not subject to the Brown Act.

January 29, 2018

Kirk Girard, Director
Department of Planning and Development
Santa Clara County
c/o David Rader & Kavitha Kumar
Santa Clara County Planning Office
70 W. Hedding Street
7th Floor, East Wing
San Jose, CA 95110

RE: Stanford University 2018 General Use Permit Draft Environmental Impact Report

Dear Mr. Girard & Staff,

The City of Palo Alto appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) analyzing Stanford University's proposal to add 2.275M square feet of academic and academic support (non-residential) space and 3,150 dwelling units or beds (1.2 M square feet), and 40,000 square feet of additional building space to their campus between 2018 and 2035. We also want to thank you, Supervisor Simitian, and other County representatives for attending meetings of our City Council and our Planning & Transportation Commission over the last couple of months and for convening related community meetings in Palo Alto.

The City of Palo Alto enjoys a strong partnership with Stanford University and is pleased to offer comments on both the County's Draft EIR and the University's proposal. We look forward to receiving detailed and substantive responses to all of these points. As noted in the letter, a number of the City's early comments for the Notice of Preparation (NOP) have not been satisfactorily addressed in the Draft EIR and remain at issue. Also, many of the City's concerns will require the County to attach meaningful conditions to the ultimate approval action. We would welcome an opportunity to talk further with County and Stanford representatives about the proposed project and conditions of approval, as well as anticipated impacts and mitigation.

Issues of primary concern to the City are briefly highlighted below, and more detailed comments can be found in the attachments.

1

A. Open Space Protections. While we understand that the University is not currently proposing development outside the Academic Growth Boundary (AGB), we are concerned that current open space protections (in the form of the requirement for a super-majority vote to amend the AGB) will expire in 2025 and are not proposed for extension or replacement. This is not acceptable to the City of Palo Alto and undermines both the validity Draft EIR and the community's trust that the University and the County will be appropriately protective of our collective open space resources. Palo Alto requests that the County extend the requirement for a 4/5 vote of the Board of Supervisors to 2050. Also, to facilitate the long term planning efforts of the City as well as the County, the City would request that the County require Stanford University to prepare a maximum build-out plan (land use and density) for its future academic and academic support and housing.

2

B. Housing. The region's housing crisis will be exacerbated by any project that proposes to add more jobs and more housing demand than housing. We urge the County and the University to reconsider parameters of the current proposal, potentially staging the proposed development as housing is built and transportation solutions are implemented rather than the other way around (i.e. housing & transit then development, rather than development then housing & transit).

3

The University should be required to increase housing within the campus to reduce its contribution to the regional housing crisis and to reduce commute trips to and from the University. The University should also provide more funding for affordable housing proximate to the campus, and should not be permitted to expand the eligible geographic area for this housing. Funding should include fees charged on new academic and academic-related square footage and should be based on current City impact fees, adjusted over time to reflect inflation and increases in construction costs.

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We also call upon the County to partner with the City regarding our Regional Housing Needs Allocations (RHNA) for the 2023-2030 Housing Element cycle. The County and the City were successful in seeking an adjustment whereby the City's allocation was decreased and the County's allocation was increased by 645 units in the 2007-2014 cycle based on a recognition that the University was constructing housing within the City's Sphere of Influence. We ask for a commitment to this kind of adjustment again, and -- if an adjustment is not acceptable to the regional council of governments -- we would ask for a commitment that the County would seek to form a "subregional entity" with Palo Alto and one or more other cities for purposes of redistributing the RHNA.

6

- C. Traffic. Stanford is recognized locally and nationally for its programs to reduce commute trips by single occupant vehicles and the City is grateful to the University for their investments in transit and transportation demand management (TDM). To build on past successes, the City requests that Stanford provide technical and financial support to partner organizations (e.g. local shuttles and Transportation Management Associations), and that the County require Stanford to make some needed adjustments to the University's "no net new commute trips" policy.

7

As we understand the "no net new commute trips" program, it is aimed at avoiding increases in commute trips in the peak direction by automobiles during one hour per day at defined cordon locations around the campus. Pass through trips that may in fact be drop-offs/pick-ups are deducted, and the University may "meet" its goal by using credits from trip reductions achieved outside the cordon. Without additional detail regarding impacts from all auto trips at the cordon (i.e. not just peak direction trips, and not assuming trip credits), without realistic assumptions of Caltrain capacity now and with the project, without more specific data on the use of Marguerite, and without more specific mitigation measures, the City cannot determine whether the University will effectively address its contribution to cumulative traffic volumes and congestion in our City. We also urge the County to examine use of the peak period, rather than the peak hour for this analysis.

8

While we recognize the need for flexibility, we urge the County to require explicit and effective mitigation such that the University is required to specify *in advance* a range of possible trip-reduction measures and transit capacity enhancements they will implement as mitigation between 2018 and 2035 and to make contributions to necessary capital improvements at City intersections and grade separations. We would welcome an opportunity to engage in conversations about all of these important issues.

9

- D. Fire Services. As of the date of this letter, Stanford University is not under a going-forward contract with the City of Palo Alto for fire protection and suppression, or emergency medical services (EMS). Stanford cancelled their contract with the City as of October 2015 and both parties have been extending the contract for short periods of time (6 to 12 months) while attempting to negotiate a successor agreement. Stanford has not identified a viable or sustainable fire protection and suppression and EMS model or provider other than Palo Alto. The University does not have access to the State of California Master Mutual Aid Agreement for fire protection and suppression – access is only available via public fire departments who are participants in the agreement – and would have access to EMS ambulance

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transportation services through Santa Clara County Ambulance unless a new contract can be executed in short order. ↑ 10
cont.

- E. Upstream Detention & Flooding. The Biological Resources section (but not the Hydrology section) of the Draft EIR identifies capacity and flood issues in San Francisquito Creek (page 5.3-46) and references one or more on- and off-site detention basins being considered by the San Francisquito Creek Joint Powers Authority. The City requests a full review of existing flood issues in both watersheds in which the project is located, as well as documentation of the change(s) in impervious surfaces and runoff volumes. This review/documentation should lead to an assessment of potential off-site flooding impacts for the baseline, project and cumulative scenarios taking into consideration the likely effects of climate change. 11

Please find additional comments about the Draft EIR and the University's application attached. We would be happy to meet with you, Supervisor Simitian, and representatives of the University if such a meeting would help resolve any of these issues and concerns. If there are any questions regarding the specific EIR comments attached, please contact our Planning Director, Hillary Gitelman at Hillary.Gitelman@cityofpaloalto.org.

Sincerely,


Mayor Liz Kniss

Cc. Palo Alto City Council
City Manager James Keene
City Attorney Molly Stump
Planning & Transportation Commission Members
Hillary Gitelman/Meg Monroe/File

(Attachments)

Stanford University 2018 General Use Permit Draft EIR Comments

Introduction to Environmental Analysis and EIR Assumptions

1. 2018 Baseline Assumptions. The additional development comprising the 2018 Baseline scenario as described on DEIR pages 5-6 to 5-7 is not clearly identified or quantified, and it is not clear whether the 2018 Baseline includes development under construction in adjacent jurisdictions. As a result, it is not clear what development is included in the 2018 Baseline and whether all pending and proposed Stanford development is adequately addressed in the DEIR in either the 2018 Baseline or Cumulative scenarios. The DEIR indicates that the 2018 Baseline includes all remaining academic and support development and housing authorized under the 2000 General Use Permit (GUP) that will be built and occupied at time the County considers approval of 2018 GUP. However, this remaining development is not quantified, and there appears to be conflicting information where quantification is provided. Table 5.15-12 (page 5.15-65) identifies 769,354 square feet of academic space and 416 beds under the 2000 GUP that will be constructed by Fall 2018. However, the DEIR also indicates on page 3-19 that Stanford may not have received project-specific approval for construction of all development authorized under the 2000 GUP when the County considers the proposed 2018 GUP. As part of the 2018 Baseline description in each DEIR topical section, the DEIR states that “nearly all remaining academic and academic support development and remaining housing authorized under the 2000 General Use Permit will be built and occupied at the time of approval of the proposed 2018 General Use Permit,” except for the planned Escondido Village (EV) Graduate Residences (2,020 net new beds), which are currently under construction, but not expected to be occupied until 2020.

12

The City asks that the Final EIR provide a table and map that clearly identifies the size, location and construction timing/status of projects that are assumed for the Baseline 2018 scenario. The EIR should also identify whether any projects in adjacent jurisdictions that are under construction (or that have received a building permit) are included in the 2018 Baseline.

2. Cumulative Impacts. The Final EIR should identify cumulative projects and whether the cumulative scenario is based on specific projects or growth projections pursuant to CEQA Guidelines section 15130(b). The basis for the cumulative scenario as described on page 5-8 is not clearly defined, and the reader is unable to discern whether all cumulative development has been addressed in the cumulative analyses, including cumulative growth in neighboring communities. The Transportation and Traffic section has the best summary of the scenarios evaluated in the DEIR (page 5.15-61) and indicates that the cumulative scenario includes completion of development authorized under the 2000 General Use Permit, including the EV Graduate Residences, background growth and reasonably foreseeable projects. Yet neither background growth nor reasonably foreseeable projects are clearly identified.

13

The City requests that the DEIR provide a clear identification of cumulative projects and/or growth in section 5.0 and that the cumulative scenario include and clearly identify:

- a. Projected growth in Palo Alto and surrounding communities, including growth expected to occur during the life of Palo Alto's adopted Comprehensive Plan and analyzed in a related EIR certified on November 13, 2017; and

14

- b. All off-campus approved or planned cumulative development on other Stanford University owned lands, including off-site housing, non-residential uses in the East Bayshore area, Stanford Research Park, University Medical Center, the transit center site, projects outside the Academic Growth Boundary, and the Stanford Golf Course. 15

3. Long-Term Stanford Growth and Protection of Foothills. The County should require Stanford to prepare an updated sustainability study to define the maximum build-out of the Stanford campus, including academic, academic support, housing, and support facilities. If this information is not included in the Final EIR, it should be required by a date certain so that County and adjacent jurisdictions can plan better plan for the future. 16

While Palo Alto recognizes and commends Stanford's commitment to the campus' Academic Growth Boundary (AGB), the City has serious concerns regarding future protection of the foothills and requests that the County extend its requirement for a 4/5 vote of the Board of Supervisors to change the AGB to 2050 concurrent with adoption of the 2018 GUP. 17

Project Description

4. Potential Future Changes in Land Uses or Distribution. The DEIR indicates that additional housing beyond the proposed limit of 3,150 units and/or changes in distribution of academic, academic support, and housing may be requested by Stanford as a condition of the permit, subject to additional environmental review and County approval (pages 1-4 and 3-20). As indicated in the City's letter on the Notice of Preparation (NOP), the City is concerned that the land use intensity identified for each development district not change or increase unless clear performance standards are identified and included as mitigation measures or project conditions of approval. The Final EIR should identify such performance standards. Since for example, the Historic Preservation Alternative emphasizes that new development will be pushed to the peripheral areas around the central campus with potential resulting impacts upon views and tree loss, the flexibility to transfer uses within development areas under the 2018 GUP raises similar concerns. The City requests that the Final EIR provide an assessment of the range and magnitude of potential future changes in the distribution of land uses, potential related impacts, especially related to visual impacts, tree removal, parking and traffic, and identify performance standards to avoid potential impacts. 18

5. Location of Future Development. Future development locations in the DRAPER district along El Camino Real between the Arboretum and the new graduate housing are not defined. Without better definition of potential building sites, some environmental impacts of the proposed 200,000 square feet of academic and academic support development on adjacent Palo Alto neighborhoods cannot be assessed, such as impacts on views and the visual character of the area, loss of useable open space, tree removal, traffic and circulation associated with parking changes. 19

Visual and Scenic Resources

6. Impacts to Visual Character of Palo Alto. As indicated in Palo Alto's comments on the NOP, the City is concerned regarding the lack of information on the location/scale of proposed development and impacts to the visual character of areas adjacent to the City. While the DEIR generally references Stanford design guidelines and policies, there is no inclusion or summary of these standards. 20

- a. The City asks that the Final EIR identify a process for City review/consultation on projects adjacent to the City, including provision of project photo simulations, and to identify specific performance standards to ensure that the visual character of the City is not adversely affected, such as: 1) standards for screening development and/or maintaining vegetated buffer along roads; and 2) specific reference to County or Stanford Design Guidelines that would address building siting, height, scale, architectural features, landscaping, screening, etc. 21
 - b. To maintain the aesthetic character and open space along El Camino Real, the City requests that the County include a mitigation that prohibits re-distribution of housing or academic square footage to the Arboretum Development District or lands designated "Campus Open Space." 22
 7. Views Along El Camino Real. Of particular concern are impacts to views of the campus along El Camino Real (State Route 82), which provides a view of open space and is a significant value to Palo Alto as a vegetated buffer between the City and the higher density development of the central campus. The proposed development of 200,000 square feet of academic and/or academic support space in the DRAPER development area is not specified, and current required setbacks do not provide adequate buffers. Alteration and/or removal of this open space would substantially alter the visual character of the surrounding area and should be considered a significant impact. Mitigation should be provided to insure that any future development in this area preserve and continuation this open view through the 2018 GUP. 23
 8. Lighting Impacts. The City requests that Mitigation Measure 5.1-4 be modified to include specific performance standards to ensure that future Stanford development results in no offsite illumination into adjacent neighborhoods within Palo Alto. 24
- Air Quality**
9. Emissions.
 - a) *Project Emissions*. Since the rate and timing of development under the proposed 2018 GUP is not known, the EIR should provide a worst-case analysis of operational emissions with emission calculations of buildout at an earlier year, such as 2025. The EIR also should identify a mechanism to ensure that all measures and programs built into the air emissions model assumptions that may help to reduce emissions, such as electrification of bus and vehicle fleets, are actually implemented with a specified timeframe for implementation. 25
 - b) *Sensitive Receptors*. Figure 5.2-1 should be revised to clearly identify all sensitive receptors, including residences since there is potential for construction to occur around campus edges, and the nearest sensitive receptors in Palo Alto are within 80 feet of project boundaries. 26
 - c) *Construction Emissions*. The DEIR indicates that Stanford agrees to use final California Air Resources board Tier 4 standards for all construction equipment, except for chainsaws and pavers, throughout the life of the 2018 GUP. The City asks whether it is feasible/reasonable to assume that the campus construction contractors will be able to acquire and use all Tier 4 Final equipment (except for chainsaws and pavers), and if not the emissions modeling and analysis should be revised. Given the amount of development anticipated, construction activities could be ongoing throughout the period from 2018 to 2035. 27

Cultural Resources

10. Review of Landscape Elements as Potential Historic Resources. Full historic protection of the Oval, Palm Drive and the Main Gate were not addressed in the DEIR. The EIR should evaluate these areas to determine whether they are historic resources and/or should be considered as part of the Main Quadrangle historic block. If found to be a historical resource pursuant to CEQA, the area(s) should be included in Mitigation Measure 5.4.1(a-e). 28

Hydrology and Water Quality

11. Groundwater Impacts and Recharge. The section lacks documentation/references for assumptions and conclusions. Impact 5.9-4 does not quantify the amount of increased groundwater use that is anticipated for the 2018 GUP as requested in the City's NOP letter or assess impacts on the groundwater basin and vicinity wells as established in the DEIR's Hydrology Significance Criterion "b." While the impact indicates that project operation could substantially deplete groundwater supplies, there is no supporting analysis, and the mitigation measure presented addresses monitoring of recharge, not impacts to groundwater supplies. Because Palo Alto operates municipal water supply wells in the vicinity, the FEIR needs to provide a full analysis with technical documentation in order to make a significance conclusion, including addressing the following: 29
- a. Identify whether the project area is within the Santa Clara Valley groundwater basin or different sub-basin. 30
 - b. Identify other vicinity groundwater wells. Figure 2 of the City of Palo Alto 2015 Urban Water Management Plan indicates that the area adjacent to campus contains groundwater wells. 31
 - c. Provide annual monitoring of groundwater levels to determine an annual average over a sufficient time to include both wet and dry years. 32
 - d. Identify the potential amount of increased groundwater use. It is stated that irrigation needs would not change substantially (page 5.9-26) without reference to an actual estimate, and in contradiction with the increase in non-potable water use estimated in Appendix Water Supply Assessment (WSA). The WSA (as summarized in Section 5.16.5) makes an assumption about groundwater demand that is not supported by the record provided in the baseline setting, in which groundwater use is shown to have increased substantially in the last extended drought, consisting of up to 88% of irrigation water demands in FY14-15. Section 5.16.5 (pgs. 5.16-16 and 5.16-17) assumes no change in groundwater supply, and does not apportion the water demand in drought scenarios between surface water and groundwater. This lack of information prevents a meaningful analysis of how much groundwater use could increase, and whether it would exceed significance thresholds. 33
 - e. Section 5.16.5 asserts with no supporting evidence that Stanford's wells can withdraw up to 1,700 AFY (1.52 mgd) without adversely affecting groundwater conditions. Given the wells have a combined pumping capacity of approximately 4,450 AFY, additional analysis is required to support the impact conclusions. The analysis and determination of 1,700 AFY as the sustainable yield needs to be disclosed and available for public review. 34
 - f. Most importantly, the EIR should evaluate impacts to adjacent and nearby wells or groundwater basin due to increased Stanford pumping. The multiple dry year scenario 35

- under full buildout needs to be addressed with respect to groundwater, and whether there could be impacts to adjacent wells or the groundwater basin. 35 cont.
- g. It is unclear under what circumstances groundwater could be used to meet potable demands. 37
- h. Assumption that groundwater recharge can only occur in the unconfined zone is not adequately explained or justified. 38
12. Storm Water and Flooding. Some of the storm water from the project area is conveyed through storm drains maintained by the City of Palo Alto that discharge into creeks managed by the Santa Clara Valley Water District (SCVWD). The Draft EIR does not include an analysis that clearly indicates the estimated runoff flows with and without the project and under cumulative conditions, so it is not possible to determine the significance of the impact on these collection facilities. This is of particular concern since the City of Palo Alto's storm drain system, downstream from Stanford, has limited capacity at various locations that can result in localized flooding. Secondly, flows from Matadero Creek discharge into a flood basin located East of Highway 101. This area is protected by a levee that will need to be improved in the future to mitigate for sea level rise. Increased flows into the flood basin would affect the future levee design. The Final EIR must provide existing and proposed runoff calculations from the project area for both the 10-year and 100-year storm event. 39
13. Adequacy of Detention Facilities. The DEIR did not respond adequately to the City of Palo Alto's request in the NOP to provide information on current storm water volumes into the existing detention facilities generated within the Academic Growth Boundary. Further, how would the added flow from the 2018 GUP development affect the current detention capacity in the case of a 10-year and 100-year storm event? Without this information it is difficult to determine the adequacy of current detention basins to meet future needs. The Impact 5.9-6 analysis asserts "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 (8.52 million square feet) of impervious surfaces in the Matadero watershed." However, there is no reference to a specific study, such as the "annual reporting," that clearly documents and quantifies changes in detention capacity as a result of identified flows from constructed projects. This information needs to be provided in the Final EIR to substantiate the DEIR's conclusions on capacity and determination that no significant impact would occur. It is unclear to what degree development under the 2000 GUP (including Escondido Village Graduate Residences) or other development added to establish the 2018 Baseline scenario has already used the additional available capacity. The Final EIR must provide documentation of the change in impervious surfaces and runoff volumes for existing development, development completed as part of the 2018 Baseline, development with the 2018 GUP Project, and cumulative development to adequately assess the impact of increased runoff and the adequacy of detention facilities and conclusion of a less-than-significant impact. 40
14. San Francisquito Creek Joint Powers Authority. Stanford should be required to coordinate and cooperate, including funding, with the San Francisquito Creek Joint Powers Authority to provide meaningful large-scale upstream detention facilities to attenuate and manage flows in San Francisquito Creek. 41
15. Flood Impacts. The City of Palo Alto's NOP comments include a request for records of past runoff volumes for the 10- and 100-year storm flow into Matadero and San Francisquito Creeks. This 42

information was not provided and is essential to determining the significance of additional storm water flows with the project. The DEIR Hydrology and Water Quality section does not identify existing flood problems, but relies on existing detention facilities to control flows. As indicated above in Comment #12, there is no cited drainage study that documents existing remaining detention capacity or quantifies additional runoff volumes added for baseline, project and cumulative conditions to substantiate the conclusion that no offsite flooding impacts will occur. The Biological Resources section does in fact identify capacity and flood issues in San Francisquito Creek (page 5.3-46) with one or more on- and off-site detention basins being considered by the San Francisquito Creek Joint Powers Authority. The Final EIR must provide a review of existing flood issues in both watersheds in which the project is located, and in conjunction with the above comment, clearly document potential off-site flooding impacts for the baseline, project and cumulative scenarios.

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cont.

Noise

16. Sensitive Receptors. The DEIR reports that residences, schools, hospitals, and nursing homes are considered to be the most sensitive to noise (page 5.11-8), and sensitive receptors are described on page 5.11-25. However, a map showing locations of sensitive receptors is not provided. The DEIR Noise section does reference Figure 5.2-1 in the Air Quality section, which shows sensitive receptors, however, specific residential receptors are not identified. This figure should be revised to clearly identify residential neighborhoods, which are not shown, since there is potential for construction to occur around campus edges, and the nearest sensitive receptors in Palo Alto are within 80 feet of project boundaries.
17. Construction Noise Mitigation. DEIR page 5.11-25 states Mitigation Measure 5.11-1, which implements a performance standard, will reduce construction-noise impacts, where it is technically and economically feasible to do so, but also suggests that variances may be permitted. The mitigation measure should specify:
 - How “technically or economically infeasible” will be determined;
 - Who has the authority to grant a variance and the process by which a variance request would be made and reviewed; and
 - That City of Palo Alto should have the ability to review and comment on requests for such variances for projects within 150 feet of their boundaries.

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Population and Housing

18. Existing and Projected Housing. The Final EIR should clearly identify/quantify existing on- campus student and faculty/staff housing and 2000 GUP units expected to be constructed and added to the 2018 Baseline as well as proposed units in the 2018 GUP. A full accounting is needed in order to confirm that Stanford has met its overall housing linkage/ratio (605 new beds per 500,000 SF of new academic and academic support) and not just for the increment of growth permitted under the project. The City also questions whether this ratio should be increased to require more units per new academic space given the region’s housing crisis, or if the housing should be provided *in advance* of non-residential development. Please clarify whether the total campus units include units constructed outside of the academic boundaries that are referenced on page 5.12-3.
19. Population Estimates and Growth. Palo Alto has concerns regarding the population estimates used

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in the DEIR and population/growth impact conclusions. The DEIR concludes that population induced by the project is consistent with Stanford's historic annual growth rate, but this rate is not identified in the DEIR. The Final EIR should identify the historic annual growth rate and the rate with the proposed project, including the basis for the "Compound Annual Growth Rate" (CAGR) used in the DEIR to estimate Stanford growth for each population. Furthermore, comparison with regional growth rates would be a more appropriate standard of review to ascertain whether or not projected Stanford growth is consistent with or exceeds the historic growth rate in Palo Alto and surrounding communities. The total population resulting from indirect household growth (graduate students/faculty and their families) in Palo Alto should be identified and compared to the City's projected population growth as part of the impact discussion, utilizing the population growth projections included in the City's adopted Comprehensive Plan.

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cont.

20. Off-Campus Household Formation and Housing Demand. The DEIR (page 5.12-17) estimates the indirect off-site campus housing demand based on off-campus household formation derived from the Stanford Commute Survey, which is not listed in the DEIR references. The City believes that the County should use another source of data or an updated objective and statistically valid survey tool to validate findings of the University's commute survey. The FEIR should clearly identify how the 2,425 off-campus household estimate was derived. Furthermore, the FEIR should also explain the assumption of a net decrease in 102 off-campus faculty households since the project's faculty housing unit count (550) is less than the increase in faculty (789).

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21. Secondary Impacts of Growth. While the DEIR estimates the number of new households that would reside off campus, the Final EIR should also clearly identify the secondary population and job growth that would occur in the City of Palo Alto as a result (total number of people per household). The analysis should use an appropriate job multiplier that is verified by comparing to other reliable sources. The Final EIR should clearly address the impacts of secondary population and job growth on traffic, housing demand, public service demand, and public school capacities. This growth is important to quantify for a variety of reasons and raises further questions about the University's current 'no new net trips' policy.

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22. Affordable Housing Demand. In its letter of comment on the NOP, the City requested an assessment of housing demand, including existing and future demand by employees and students qualifying for below market rate affordable housing. However, the DEIR does not address the project's demand for affordable units off campus in Palo Alto. It is expected that a significant number of graduate students, postdoctoral researchers and staff would need affordable housing. Taking the Palo Alto number alone, 367 or 5.6% of the City's projected household growth between 2015 and 2040 would be from lower paid Stanford graduates, post-doctoral graduates, faculty and staff. The City would need to provide an additional 2.3% of its housing stock in 2040 for low and moderate income units. This would be in addition to the low- and moderate-income housing need generated by the rest of the City's population and employment. The analysis also adjusts the ABAG household numbers without documentation. For example, the DEIR includes a 2015-2040 period for future household formation, whereas ABAG uses 2010-2040 without a corresponding change in household formation. Further, the estimate of new households assigned to Palo Alto is based on current residency, which should also be documented. Therefore, the additional affordable housing demand generated by Stanford should be more accurately assessed in the Final EIR with regards to impacts on the City's housing supply.

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23. Off-campus Affordable Housing Fees. Under the 2000 General Use Permit, Stanford is required to provide one on-campus affordable housing unit or make an in-lieu payment to Santa Clara County for each 11,763 square feet of constructed academic development.
- a. The Final EIR should identify how many affordable units have been constructed on campus and how many have been constructed as a result of payment of in-lieu fees with the 2000 GUP in order to document whether Stanford is meeting its affordable housing requirement. Please indicate projects, number of units and location of affordable housing that have been constructed under this requirement and the number of affordable units that have been constructed in Palo Alto under this program. 53
 - b. The DEIR states that Stanford will continue contributions to the County-administered off-campus affordable housing program. However, without the analysis to identify affordable housing needs as requested in Comment #20, the extent to which these fees actually meet affordable housing needs is not known, and the finding of a less-than-significant impact is not substantiated. Please consider that impact fees are generally set at levels well below what it actually costs to provide housing. Also, please note that the City opposes any effort to expand the geographic area (six miles) in which the Stanford affordable housing funds are used. 54
 - c. Stanford should continue to pay a housing development fee for academic and academic support square footage to the County to assist receiver communities with providing housing for this spillover Stanford population. This fee should be based on Palo Alto's adopted fee schedule and should be indexed to inflation and the increase in regional construction costs. 55
 - d. The basis for the DEIR statement that 900 new graduate student units would equate to approximately 450 affordable housing units that will be credited toward the County's RHNA (page DEIR page 5.12-20) should be explained and substantiated. 56

Public Services

24. Fire Protection and Emergency Services.
- a. The impact analysis does not identify a specific need for new or physically altered public fire protection/emergency services facilities related to project growth. However, no substantial evidence is provided to support this conclusion. The Final EIR should assess the effect of on- and off-campus growth on response times and other performance criteria identified in the EIR and provide a clear discussion of project impacts – will new or relocated facilities be required at build-out of the project? The effects of the project on fire and emergency services related wildland fires also should be addressed. 57
 - b. According to the DEIR, replacement and improved fire stations would allow the Palo Alto Fire Department to adequately serve growth and buildout in the City. This is based on Stanford's continued annual fair share payment to the City of Palo for fire protection services. Stanford and the City are currently in negotiations for a multi-year contract with automatic renewal for fire and EMS services, but agreement has not yet been reached, and thus, the issue of long-term fire protection service is not adequately assessed in the EIR. The Final EIR should evaluate development alternatives for Stanford if agreement on a fire contract cannot be reached. 58
 - c. The Palo Alto Fire Department requests that the following text be added to page 5.13-1, Add: The PAFD provides fire protection and suppression, and emergency medical service 59

(EMS), for all areas within the jurisdictional boundaries of Palo Alto in addition to some of the unincorporated land surrounding the city limits, including the project site under a services contract. As of the date of the City's response, Stanford University is not under contract with the City of Palo Alto for fire protection and suppression, and EMS. Stanford cancelled the contract as of October 2015, and both parties have been extending the contract for short periods of time (6 to 12 months) while attempting to negotiate a successor agreement. Stanford does not have a viable or sustainable fire protection and suppression, and emergency medical service (EMS) model or provider other than the City of Palo Alto. Stanford does not have access to the State of California Master Mutual Aid Agreement for fire protection and suppression – access is only available via public fire departments that are participants in the agreement. Stanford would have access to EMS ambulance transportation services through Santa Clara County Ambulance.

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cont.

25. Police Services Impact. The DEIR analysis of police services concludes that the 2018 GUP would increase demand for service, but would not result in an adverse physical impact from construction of additional facilities. No evidence is presented about the effect of on-/off-campus growth on police and emergency dispatch services provided by Palo Alto or performance criteria for these services. The Final EIR should address impacts of Stanford population growth and new housing on Palo Alto Police Department (PAPD) response times, staffing, facilities, traffic enforcement on City streets, and response in mutual aid situations. The Final EIR should also address indirect impacts associated with increased calls for mutual aid assistance and associated impact on the PAPD performance standards for provision of adequate services. The PAPD has concerns regarding increased calls for PAPD service especially for parking enforcement, traffic enforcement on bordering streets, special sporting and other events, and visiting dignitaries, which should be addressed in the Final EIR. All additional service requests may lead to the need for additional facilities and these should be identified and analyzed. If the University intends to rely on new City facilities, the University should contribute to their cost.

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26. Schools Impacts. The DEIR concludes that the project would increase enrollment in local schools, but would not result in adverse physical impacts from the construction of additional school facilities that may be needed in order to maintain acceptable enrollment standards. Of the new housing provided on-campus, growth in school-aged children is associated only with 550 new units of housing for faculty, staff, postdoctoral scholars, and medical residents. The Final EIR should also address student growth from undergraduate and graduate students, and from indirect growth of 367 new households in Palo Alto. Based on the student generation rates presented in the EIR, the project could result in 183 additional students from new households in Palo Alto.

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While enrollment data is not presented, the DEIR states that there will be declining enrollment in Palo Alto Unified School District (PAUSD) schools through 2026/27 and given that decline, there should be remaining capacity to accommodate project-generated students. PAUSD disputes this conclusion and we request that the Final EIR be revised to reflect their projections as well as the City's adopted Comprehensive Plan. With these changes, the cumulative analysis will indicate the need for new facilities. The Final EIR should acknowledge the University's contribution to this need, particularly in relationship to the location of new households with school-aged children. Representatives of PAUSD have suggested that concentrating new units along Quarry Road may contribute to the need for a new school in that vicinity.

Recreation

27. Additional Parks and Recreation Facilities Impacts.

- a. There is no explanation for why the three-mile radius was used to identify parks and recreational facilities that may be used by Stanford's population. Apparently this was based on a survey of current use by Stanford population. However, the impact analysis and mitigation was limited to the four parks in the College Terrace neighborhood. Table 5.14-2 omits Peers Park, Bol Park, Juana Briones Park, John Boulware Park, Robles Park, Ramos Park, Sarah Wallis Park, Johnson Park, Seale Park, Hoover Park, and Monroe Mini-Park. These parks are within the three-mile radius of campus and should be considered in the EIR and included in any mitigation or compensation. In addition, two parks on leased land from Stanford, El Camino Park and Mayfield Fields, are within the three-mile radius. These lease arrangements and the future of these parks should be described; will they remain in use through the horizon year of 2035 and how long past that date?
- b. The Final EIR should also consider the impacts on paths through Bol Park that are used for recreation and bicycle transportation by Stanford-residing adults as well as Stanford-residing children attending Terman and Gunn schools. People traveling to/from the Stanford campus use these paths on a daily basis and the impacts of increased use should be assessed.
- c. The DEIR did not mention the substantial current impact or anticipated future impact of the Escondido Village housing and 2018 GUP by Stanford affiliates and their children on the College Terrace neighborhood library located in one of these College Terrace neighborhood parks.

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28. Recreation Facilities. The DEIR indicates that Stanford has offered to pay the City for on-campus resident student and faculty use of the four parks in College Terrace. The City believes that the payment offered (\$300,000) is understated because as a one-time fee, it will not address the impact and needed future maintenance at these and other parks caused by Stanford students and faculty and their families over the 17 years of the 2018 GUP. The fee offered fails to address the fact that in one of the heavily used parks there is a neighborhood library impacted by the use of families associated with Stanford. The City Librarian indicates that the renovation costs to expand the current 2,392 square foot building to 4,860 square feet would be (based on Sunnyvale and Newark studies of \$250-385/SF) \$617,000 to \$950,180 for a full renovation to include the entire building for library purposes and meet the anticipated increase in service resulting from the 2018 GUP, particularly from the Escondido Village graduate student/family housing project (2,020 net new beds). Stanford should focus on expanding the amount of park land available to city residents and Stanford users by providing acreage for park use, including making currently leased areas permanent, and funds for ongoing maintenance.

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Transportation / Traffic

29. Traffic Impact Analysis. Palo Alto recognizes Stanford's nationally-recognized efforts to reduce single occupant vehicle trips since 2001 and its laudable "No Net New Commuter Trips" goal. However, Palo Alto has a number of concerns with the Traffic/Transportation section, including its assumptions and analyses, and questions the effectiveness of the "No Net New Commuter Trips" goal going forward. The City's primary concerns are listed below and are fully articulated in the attached Technical Memorandum from Hexagon Transportation Consultants who reviewed the

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DEIR as part of the City's review. The City requests that all of the comments presented in the Hexagon memo be addressed as part of the City's comments on the DEIR. A summary of the City's concerns include:

- a. There are several concerns with the "No Net New Commute Trips" goal's wording and methodology that should be addressed. The three key areas of concern include: the definition of the peak period and the methods of monitoring traffic, the direction of travel to be monitored, and the unlimited use of trip credits to meet the goal. An additional concern is the feasibility of further reducing single-occupant vehicle trips to the extent needed in order to meet the No Net New Commute Trips goal for development in the 2018 GUP. The method and timeframe for traffic counts also is a concern.
- b. Given the current experience based on the 2000 GUP development, there is concern about the trip generation rate being based on traditional peak periods (7 – 9 AM and 4 – 6 PM) that potentially underestimate impacts of project trips given the recent trends of "peak spreading" and the growing level of University trips during off-peak periods.
- c. The analysis relies on public transit to help achieve the No Net New Commute Trips goal. However, some of the assumptions used in the analysis of transit capacity and performance analysis for transit and Caltrain are not entirely accurate may not be achieved, such as expanded Caltrain capacity from five to eight cars by 2035. The EIR should clearly identify current and future ridership, service and capacity of all transit providers (VTA, Caltrain, and the Marguerite) to ascertain whether adequate capacity exists to serve the project or whether additional mitigation or improvements will be required. If capacity increases are not fully funded, the EIR should assess impacts with and without these increases.
- d. The project proposes a 2,000 space parking reserve, in addition to constructing all parking for the 2000 GUP. However, expansion of parking is contrary to the University's TDM and trip reduction goals that seek to reduce vehicle trips. The effects of providing additional parking should be assessed.
- e. Further evaluation is needed regarding impacts at specific intersections, including the Caltrain grade separations at Alma and Charleston and freeway segments as discussed in the attached technical memo. The analysis should assess impacts with and without Caltrain grade separations.
- f. The EIR does not address project impacts on off-campus parking and resulting traffic circulation and does not analyze the effects of City programs to manage on-street parking in the vicinity of the campus. Have these programs affected Marguerite bus routes and pushed Stanford parkers to distant neighborhoods? Impacts of Marguerite bus routes themselves should also be considered.
- g. The EIR should explicitly identify the current and future transit and TDM programs that will be relied on to meet the No New Net Commute Trips goal. The effectiveness of these specific programs should be evaluated and they should be monitored as mitigation pursuant to Public Resources Code Section 21081.6.
- h. The EIR should review the option of rerouting the Marguerite through campus to reduce impacts on adjacent City streets.
- i. The City requests that the threshold for the Crescent Park TIRE be re-calculated based on only the "non-diverted" traffic on Hamilton. In other words, the analysis should subtract the existing diverted traffic from Hamilton, calculate a revised threshold, and then see if the trips generated by the Stanford GUP would meet the lower threshold.

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30. No Net New Commute Trips. The City of Palo Alto requests that Santa Clara County require Stanford to revise the No Net New Commute Trips policy and adopt a mitigation monitoring program with monitoring by an independent third party to insure that it continues to be effective as development under the 2018 GUP takes place. Members of the Palo Alto community experience traffic congestion on a daily basis that can be attributed to students, faculty and staff of Stanford University. If the County wants evidence of this, it should collect data throughout the day when Stanford is in session, and when Stanford is not in session. The data will show that traffic congestion is noticeably less when Stanford is not in session and validate community members perspective that the current "no net new commute trips" program is not working.

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As a legal matter, if the "no net new commute trips" policy is expected to function as mitigation, it should be revised to address all vehicle trips entering and exiting the campus during the peak hours and Stanford should not be able to apply unlimited credits for trip reductions outside the cordon. Certainly the cordon credit area should not be expanded. The County should establish a threshold for both directions of travel, should consider the trips made during a longer peak period, should revise the method for discounting "cut-through" trips, and should set a limit on the number of trip credits that may be used toward achieving the goal.

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The County should also identify specific mitigation measures to reduce vehicle trips and the University should be required to implement or fund those measures as well as making fair share payments to operational and capital improvements needed to address its contribution to regional congestion. The effectiveness of all mitigation should be quantified. Also, if the No Net New Commute Trips assumption is changed or cannot be met, the EIR should address whether the analyses regarding criteria pollutant and greenhouse gas emissions and exposure to traffic noise need to be revised as a result of potential increased traffic.

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31. Safe Routes to School. The Final EIR should identify and describe the existing safe routes to schools activities, which includes crossing guards at busy intersections. The Final EIR should assess impacts and possible decrease of performance as a result of project traffic in accordance with the Transportation/Traffic Significance Criterion "P" cited on page 5.15-54 of the DEIR.

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Currently Palo Alto, the Palo Alto Unified School District, the Palo Alto PTA, and Stanford work cooperatively on making necessary improvements to provide the safe routes to school, particularly for Escondido and Nixon elementary schools, located on Stanford-owned land and heavily attended by children of Stanford families. If an additional school is provided near Sand Hill Road for students living in University housing on that side of campus, this cooperation on safe routes to school should be extended to access to any future school site as well. Currently, Stanford's funding for agreed improvements for safe access to schools has not been fully implemented. The City asks that Stanford create an annual budget based on the agreed work program for future improvements that benefit Stanford faculty, employees, staff and graduate students with children. In addition Stanford should assist the City with the cost of school crossing guards required at major intersections that benefit both children of both city residents and Stanford affiliates.

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32. Sharing Costs of Needed Improvements. In the 2000 GUP there were two intersections that Stanford committed to improve regardless of whether or not the No Net New Commute Trips goal was met. The reason for this appears to be based on future projects. In the same fashion, the 2018

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GUP should address three projects that are critical to the Palo Alto community based on immediate need and Stanford's future impacts on Caltrain service and capacity.

- a. Stanford should be required to pay its fair share towards grade separations at all rail crossings in Palo Alto in order to increase the safety of the intersections for Stanford commuters, including bicycle, pedestrian and vehicle traffic, and to improve Caltrain service and facilitate ridership increases relied on by Stanford to achieve the "No Net New Commute Trips" goal.
- b. Stanford should be required to fund and potentially construct improvements to the Palo Alto Intermodal Transit Center to accommodate increased bus and bicycle volumes generated by Stanford's growth and to facilitate the eight car trains that the DEIR indicates will be necessary to meet Stanford's Caltrain ridership demand with the 2018 GUP project.
- c. Stanford should be required to provide a transit center near the I-280/Page Mill Road interchange to alleviate traffic impacts in Palo Alto. This could alleviate congestion created by traffic to both the academic growth area as well as to the Stanford Research Park.

33. Bicycle Improvements. Stanford has offered to contribute to one bicycle improvement in Palo Alto: Bol Park Trail. Despite the figure in the DEIR, the Bol Park Trail has not been designed. Part of the existing trail will be located on a shared pathway parallel to the street on Hanover Street. Currently, improvements on Page Mill Road will result in the installation of a new signal at Page Mill and Hanover Street. However, the improvement to the Bol Park Trail will require modification to this signal for bicycles and pedestrians. The funding offered by Stanford (\$250,000) will just cover the cost of the modification to the signal. Since this trail is a connection between Stanford's main campus and the Stanford Research Park and can be a part of the TDM measures for the No Net New Commute Trips, the City feels that Stanford should make a greater contribution to the project including: dedication of right-of-way under the existing separated pathway on Hanover Street and contribution of funds to make the necessary upgrade of the Hanover pathway so that it meets current bicycle and pedestrian safety standards.

Project Alternatives

34. Project Alternatives. While the DEIR includes a Reduced Project Alternative, the City suggests a Phased Alternative that permits new development and student growth only after transit/TDM programs are expanded and housing is constructed to serve the new development.

Miscellaneous DEIR Text Corrections

35. EIR Corrections. The Final EIR should make the following corrections.
- a. Page xv: "OEM California Office of Emergency Management" should be deleted (see Cal OES)
 - b. Page 1-33: *Protection and Maintenance of Emergency Service Access and Routes*. That should be changed to include the Palo Alto Police Department (which runs the 9-1-1 center for both Palo Alto and Stanford).
 - c. Page 5.8-30: Change "County OEM" to "County OES"
 - d. Page 5.8-33: References should also include: City of Palo Alto Emergency Operations Plan, available on: http://cityofpaloalto.org/services/public_safety/plans_and_information/ and City of Palo Alto Threat and Hazard Identification and Risk Assessment (THIRA), available on: <http://cityofpaloalto.org/thira>.

e. Page 5.13-2:

- Remove: one Rescue truck (at Station 2) for vehicle accidents, hazardous materials and technical rescues, and search and rescue at fires.
- Modify: two advanced life support ambulances (at Stations 1 and 2) that respond to all medical incidents, 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).

f. Page 5.13-3: Modify the sentence to read: In FY 2016, PAFD arrived at 89 percent of fire emergencies within eight minutes, 92 percent of EMS calls within eight minutes, and placed a paramedic at EMS calls within 12 minutes, 99 percent of the time.

g. In Palo Alto, the Police Department funds 29 crossing guards for the City on school commute routes. (This fact was left out of the text on page 5.13-4.)

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HEXAGON TRANSPORTATION CONSULTANTS, INC.

Technical Memorandum



Date: November 13, 2017

To: Stephanie Strelow, Dudek

From: Gary Black, President, and Jane Clayton, Associate

Subject: Review of Stanford 2018 General Use Permit Draft Environmental Impact Report on Behalf of the City of Palo Alto



Hexagon Transportation Consultants, Inc. has reviewed the Draft Environmental Impact Report (DEIR) and the supporting Transportation Impact Analysis prepared for the 2018 General Use Permit (GUP) application filed by Stanford University with the Santa Clara County Planning Office. In order to prepare this letter, we have also reviewed the Project Description and Background Conditions Report included in the 2018 GUP application, the 2015 and 2016 *Stanford University Traffic Monitoring Reports*, and comments made at meetings of the Planning and Transportation Commission (8/30/17 and 11/8/2017) and the City Council (10/16/17). We have conducted this review at the request of the City of Palo Alto and have paid particular attention to the areas included in the City's comment letter for the Notice of Preparation (NOP) related to transportation and circulation. We have also reviewed all of the transportation-related impact findings and the proposed mitigation measures for their adequacy.



The development proposed in Stanford's 2018 GUP application includes 2.275 million square feet of academic and academic support space, 3,150 dwelling units or beds (of which 550 units may be used by faculty, staff, post-doctoral fellows, or medical residents), 40,000 square feet of space for child care centers and facilities for the university's commute alternatives program, and a parking supply reserve of 2,000 spaces. Stanford proposes continuation of the "no net new commute trips" goal included in the 2000 GUP, which is defined as no additional trips above a measured base level during the peak commute time in the campus commute direction (inbound towards campus in the AM peak hour and outbound from campus in the PM peak hour).



Key Areas of Concern

The "No Net New Trips" Goal: Methodology and Feasibility

The 2000 GUP Condition G.4 defines the "no net new trips" goal as "no increase in automobile trips during peak commute times in the peak direction, as counted at a defined cordon location around the campus." That condition also states:

"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 proportional funding of mitigation measures for specified impacted intersections."

Hexagon has concerns about the "no net new trips" policy as it is currently defined. The three key areas of concern are the definitions of the peak periods to be monitored, the direction of travel to be monitored, and the unlimited use of trip credits to meet the goal. The DEIR invokes the "no net new



trips" policy as mitigation for potential impacts. However, Hexagon is concerned that the policy overlooks the following traffic issues.

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Lengthening of Peak Period and Definition of Peak Hours: Although AECOM gathers 24-hour cordon count data for 8 weeks every year, the analysis of data to determine whether Stanford has met the "no net new trips" standard is currently limited to the hours of 7:00 – 9:00 AM and 4:00 – 6:00 PM. There is abundant evidence throughout the Bay Area that these traditional peak periods have lengthened, and, in fact, the traffic counts conducted at study intersections for this DEIR were conducted during the hours of 7:00 – 10:00 AM and 4:00 – 7:00 PM. In its NOP letter, the City specifically requested that the EIR identify the peak travel periods for the campus using these 24-hour cordon counts, but this was not done. At a minimum, the peak periods used for monitoring cordon counts should be consistent with the peak periods used for the intersection counts conducted for the DEIR (7:00 – 10:00 AM and 4:00 – 7:00 PM).

Hexagon's spot review of the raw cordon count data in the 2015 and 2016 *Stanford University Traffic Monitoring Reports* indicates that the AM peak hour frequently occurs after the 7:00 – 9:00 AM period. Similarly, the PM peak hour frequently occurs after the 4:00 – 6:00 PM period. However, for the purposes of determining whether Stanford has met the goal, any peak hour volume that does not occur during those defined two-hour periods is ignored. The interpretation of "peak commute time" in the goal should be modified for the 2018 GUP so that if, for example, the greatest volume of vehicle trips in the evening occurs between 5:30 - 6:30 PM, then that is the volume that should be used as the basis for monitoring whether or not Stanford has met the standard.

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One of the likely reasons why there appears to be a disconnect between Stanford's achievement of the "no net new trips" standard and the community's experience of increasing levels of congestion may be that there are higher levels of Stanford-related trips throughout the day or during much longer periods during the morning and evening than was true in 2001. Therefore, it is critical that a fresh analysis of the peak periods of travel to and from the campus be conducted and that recommendations for future cordon counts be based on that analysis.

Direction of Travel: The "no net new trips" standard currently applies only to the peak direction of travel: inbound towards campus in the AM peak hour and outbound from campus in the PM peak hour. As the university constructs more on-campus housing for students, faculty, and staff, the volume of traffic in the "counter-commute" direction will also increase. Figure 4 of Part 1 of the TIA shows the change in proportion of resident and non-resident peak hour trips between 2015 and 2035, indicating that resident trips are projected to be a larger percentage of total trips in the future.

Under the 2018 GUP proposal, the volume of "counter-commute" travel could increase substantially, but Stanford would still be deemed to meet its goal as long as the "commute" direction did not increase (or was offset by trip credits). In its NOP letter, Palo Alto requested that the DEIR include an analysis of direction of travel, but this was not done.

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Even if Stanford meets the "no net new trips" standard as it is currently written, it would be possible for the development proposed in the 2018 GUP to have intersection impacts that should be mitigated. The DEIR overlooks the possibility that intersection impacts may result from vehicle trips in the other direction (outbound from campus in the morning and inbound in the evening). The EIR should address this issue and propose a means of mitigating any impacts that may be caused by increases in traffic leaving campus in the morning and entering campus in the evening.

Trip Credits: The 2000 GUP specifies that the County will recognize participation by Stanford in off-campus trip reduction efforts and credit reduced trips toward attainment of the goal. Stanford has not met the PM peak hour 2001 cordon count threshold (3,591 trips) in certain years, but has been able to meet the "no net new trips" standard by taking credit for its off-campus trip reduction efforts within a defined geographic boundary (the cordon credit area).

Stanford could continue to increase the number of trip credits it claims in the future as a way of dealing with rising cordon counts through the life of the 2018 GUP. The fact that in 2015 Stanford claimed 844 trip credits, equal to 23.5% of the 2001 "trigger" value for the PM peak hour, raises a question as to whether there should be a limit or cap placed on the percentage of trip credits that may be taken during the life of the 2018 GUP in order to meet the standard. For example, Stanford proposes to take trip credits every year after providing funding for bicycle facility improvements in Palo Alto and neighboring jurisdictions (in Chapter 8 of the DEIR).

This concern is heightened by the large number of potential problems concerning the trip credit methodology that were raised in the *2016 Stanford University Traffic Monitoring Report*. No fewer than nine issues have been raised by the consultant preparing the report for the County. Hexagon believes these issues should be addressed and resolved as part of the EIR process since they are central to the "no net new trips" methodology. Hexagon also believes that trip credits should only be granted for actual trip reductions, not predicted reductions.

Hexagon notes that the monitoring reports do not provide any information on the various measures for which credits have been claimed each year, only the total number of credits claimed. In its NOP letter, Palo Alto requested greater transparency in the cordon count and trip credit reporting.

Feasibility of Mode Split Required to Meet Standard: On page 5.15-156 of the DEIR, the drive-alone mode share is given as 43.2% in 2015, which would need to be reduced to 36.5% to meet the "no net new trips" standard for the 2018 GUP development (assuming no trip credits are taken).¹ The University has been successful in reducing single-occupant trips to levels much lower than the County average. However, the TIA (Figure 2 of Part 1) indicates that SOV mode share is approximately 50% and has been flattening out in recent years, indicating that additional reductions may be difficult to achieve. Given the environmental characteristics of the commute shed of Stanford affiliates, such as land use density, transit availability, and other factors, it is likely to be challenging to reduce that mode share by an additional 6.7%.

The TIA (Part 1, pp. 10-11) includes the following strategies expanding Stanford's TDM programs in order to meet the "no net new trips" standard under the 2018 GUP:

- Commuter buses
- Expand local bus service and first/last mile connections (Marguerite shuttle)
- Improve key bike facilities to reduce road stress for cyclists on access routes to campus
- Parking fees and policies
- Student vehicle prohibitions

However, it is an exceedingly ambitious goal to construct 2.275 million square feet of academic and academic support space and 3,150 new beds/units and to not increase peak hour vehicle volumes at all. After many years of a highly successful TDM program, all of the "low-hanging fruit" is gone,

¹ The TIA indicates that the drive-alone mode share was approximately 50% in 2015. The Background Conditions Report also states that the drive-alone rate is 50% (page 4.47) The difference between the two percentages given for the 2015 drive-alone mode share (43.2% and 50%) should be explained.

and it may prove difficult to persuade many of the remaining SOV drivers to change modes. Stanford should explore what it will take to achieve a 36.5% SOV mode share (no net new trips) with real-world examples.

If the "no net new trips" standard is not met under the 2018 GUP, then Stanford has proposed that it be "given the option of achieving No Net New Commute Trips by funding other entities' trip reduction programs before applying such funds to its proportionate share of intersection improvements." Ways in which the funding provided could be programmed as consistently over multi-year periods as possible should be explored, rather than on an annual basis with large dollar amounts in some years and no funding at all in other years, depending on the preceding year's monitoring report. Successful trip reduction programs require consistent funding to be most effective.

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2015 Cordon Counts and the 2018 GUP Trip Generation Rate

The trip generation rates for the new development proposed in the 2018 GUP are based entirely on the 2015 cordon counts conducted as part of the County's annual monitoring process regarding the "no net new trips" standard. To the extent that the 2015 cordon counts do not accurately capture the number of vehicle trips generated by the campus during the AM and PM commute times, the trip generation estimates for the proposed growth will be correspondingly underestimated, which should be corrected in the Final EIR.

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Identification of "AM peak hour" and "PM peak hour": As discussed above, the number of peak hour trips presented in the 2015 *Stanford University Traffic Monitoring Reports* is the peak hour volume during the periods of 7:00 – 9:00 AM and 4:00 – 6:00 PM. However, due to the lengthening of peak commute periods throughout the region and the widespread use of flextime schedules, the peak traffic volume within that window of time may not actually be the peak traffic volume if a longer or different peak period were considered. The DEIR did not address the issue of changes in the peak commute times, even though the City requested such an analysis and it is key to the trip generation estimates used in the DEIR; this should be considered in the Final EIR.

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"Hidden" vehicle trips: The 2015 cordon counts may also underestimate Stanford's existing trip generation if there are vehicle trips that are not counted. The City's NOP letter asked the DEIR to study the extent to which Stanford commuters are avoiding cordon counts by parking on local streets in adjacent city neighborhoods. The DEIR addresses this concern on page 5.15-176, and Figure 5.15-21 shows that there are Residential Parking Permit programs in place in all the Palo Alto residential neighborhoods adjacent to campus. However, two of these programs did not exist when the 2015 cordon counts were conducted (Evergreen Park – Mayfield and Southgate). The DEIR should have included some estimate of off-campus parking.

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The DEIR also notes that there is very little on-street parking that is not time-restricted adjacent to campus, with the exception of approximately 150 parking spaces on the Stanford side of El Camino Real. The DEIR states that:

"These on-street spaces are essentially filled before the traditional peak hour of 8:00 – 9:00 AM. Thus, drivers using these spaces are not traveling during the peak hour, and therefore are not parking in this location to avoid cordon counts."

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Since the cordon counts begin at 7:00 AM, the fact that these spaces are filled by 8:00 does not mean these drivers aren't avoiding cordon counts. As noted above, Hexagon suggests that the cordon counts be re-evaluated to determine the actual peak hour, and these spaces should be included.

Another potential issue with the 2015 cordon counts is related to the exclusion of vehicles that enter campus and then leave it within 15 minutes, because they are considered cut-through traffic that is not generated by Stanford. Because of this, if a Stanford affiliate is dropped off or picked up on campus, the vehicle that enters campus to drop them off in the morning or leaves campus after picking them up in the evening is excluded from the cordon count, even though that trip is clearly a Stanford-generated trip. An evaluation of the cordon locations where a vehicle entered and where it exited campus would help identify some of these trips and distinguish them from actual cut-through trips. The Final EIR should account for this issue.

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Analysis of Transit Capacity and Performance

The City's NOP letter requested that the DEIR evaluate transit performance and efficiency as it relates to site design, mobility, and access. A map showing transit priority areas for nearby transit agencies (Figure 5.15-10) and a map showing areas within a 5-minute walkshed of Marguerite stops with headways of 15 minutes or less (Figure 5.15-22) were included, but they do not show the location within the 2018 GUP area of key points of development proposed in the 2018 GUP. The EIR should include further discussion about optimal land use and site design to support an effective and efficient transit system on campus.

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The City's NOP letter also requested that the demand, capacity, and utilization of Caltrain, connecting transit services at the Palo Alto Intermodal Transit Center (PAITC), and the PAITC itself be studied. The DEIR does not include a capacity assessment of the PAITC at all, including its bus bays, layover facilities, and the operational impacts of an expanded Marguerite service on other transit providers, which should be addressed in the Final EIR.

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The capacity analysis of Caltrain includes a key assumption that the trains will include eight cars by 2035, rather than the current five cars. The Caltrain electrification/modernization project now underway does not include funding for extending platforms so that 8-car trains could be utilized. To make the capacity analysis consistent with the electrification project, it should not be assumed that the infrastructure improvements necessary to run 8-car trains will be operational by 2035. If train capacity were constrained by the existing 5-car maximum, then there would be a significant impact to this transit service. Hexagon suggests that an appropriate mitigation measure would be to make a fair share contribution to the platform retrofit needed at the PAITC to permit lower level boarding, which would speed up dwell time.

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The DEIR asserts that transit capacity is not a potential impact under CEQA, but we disagree. Since a project can be found to cause a significant impact to transit if an element of it would conflict with an adopted policy regarding public transit or decrease the performance or safety of transit facilities, then operating extremely crowded trains would qualify as conflicting with an adopted policy and as reducing the performance of the service from the rider's point of view. Transit services generally have adopted policies or standards regarding load factor (how many riders they can accommodate per bus or per car). If a load factor is exceeded by a large amount, then the service is no longer comfortable or convenient. Such a load factor would clearly also have secondary impacts on mode choice.

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Aside from how the issue is treated under CEQA, there is also a basic operational issue that relates to Stanford's ability to achieve the "no net new trips" standard. If achieving the standard would require an increase in the transit mode share, as conservatively assumed by the DEIR analysis, but the capacity is simply not available on the trains to handle the increased ridership, then the standard would probably not be achieved. This could be the case if the assumption regarding 8-car

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trains is changed to 5-car trains. The analysis should be re-assessed in light of these considerations in the Final EIR.

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Requested Parking Reserve of 2,000 Spaces

Stanford has requested approval of a 2,000 space parking supply reserve, for which it does not seek initial authorization because it seeks to discourage automobile ownership and use. However, Stanford proposes that it be able to seek Planning Commission approval to construct parking spaces from that reserve under any of three defined circumstances.

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One of the proposed circumstances for increasing the parking supply is meeting the “no net new trips” standard. There is an obvious contradiction here: if Stanford is meeting the standard, why would it need up to 2,000 additional parking spaces? Clearly, additional parking supply would make it increasingly difficult to meet the standard in the future.

There are two obvious ways in which Stanford could meet the “no net new trips” standard and yet still need 2,000 more parking spaces by 2035. One is that the standard can now be met through an unlimited use of trip credits. Stanford could meet the standard through services and facilities that reduce SOV trips off-campus, but still need additional parking for new trips to campus generated by the development proposed in the 2018 GUP. The second relates to the lengthening of the peak period. If an increasing number of trips are made outside the peak periods as they are defined (7:00 – 9:00 AM and 4:00 – 6:00 PM) under the 2000 GUP or if the trips made in a single peak hour no longer represent as large a percentage of daily traffic as has been true historically (because traffic is more evenly spread over a much longer period of time), then Stanford would need additional parking to accommodate those trips – even though the standard, as currently monitored, has been met. The EIR should address this issue directly and define a more stringent qualifying circumstance for purposes of allowing construction of 2,000 more parking spaces or eliminate this circumstance from the request.

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Review of Impacts and Mitigation Measures

Hexagon evaluated all transportation-related impact findings in the DEIR to determine their adequacy. The DEIR’s analysis of every study intersection was reviewed carefully, to ensure that all potential mitigation measures at impacted intersections were included. The following sections address each impact evaluation about which Hexagon has comments or questions. Impact discussions – and specific intersection impacts – about which Hexagon has no comments or questions are not included.

Level of Service Threshold for Unsignalized Intersections

DEIR: The DEIR states on page 5.15-57 that “None of the applicable jurisdictions have an officially adopted significance criterion for unsignalized intersections. For purposes of this analysis, significant impacts are defined to occur when the addition of project traffic causes:

- The average intersection delay for all-way stop-controlled intersections or the worst movement for side-street stop-controlled intersections to degrade to LOS F, and
- The peak hour traffic signal warrant from the California Manual of Uniform Traffic Control Devices (CA MUTCD) to be satisfied at an unsignalized intersection already operating at LOS F.”

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Hexagon Comments: The City’s threshold for non-CMP signalized intersections is LOS D, and the City’s practice has been to apply that threshold to unsignalized intersections as well. The

significance criteria for impacts at unsignalized intersections have been cited in several TIAs in recent years as when the project causes a movement to degrade to LOS E or F and the peak hour signal warrant is met. This Issue concerning Palo Alto's impact criteria is relevant to the unsignalized study intersection of Bowdoin Street / Stanford Avenue in the DEIR, which is discussed further below.

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The following section addresses all of the study intersections within Palo Alto where a significant impact was found and where Hexagon had comments, plus the intersections of I-280 Southbound Off-Ramp/Page Mill Road, I-280 Northbound Off-Ramp/Page Mill Road, and Bowdoin Street/Stanford Avenue.

Intersection Impacts (2018 and 2035 Conditions)

I-280 Southbound Off-Ramp and Page Mill Road (#13)

DEIR: Proposed mitigation measure for 2018 impact is "Contribute fair share funding toward the installation of a traffic signal." However, on page 5.15-92, the DEIR references the *Page Mill Expressway Corridor Study Report* and notes that the improvement concept is for this intersection is "a roundabout, with traffic signal at the I-280 NB Ramps intersection, and a third eastbound and westbound through lane on Page Mill Road to the east of the I-280 Northbound Ramps intersection." The DEIR says the Project's fair-share funding towards a traffic signal at this intersection "may be applied toward a roundabout."

Hexagon Comments: Stanford should contribute its fair share of the roundabout and other improvements that have been agreed upon by the three agencies (Santa Clara County, City of Palo Alto, and Town of Los Altos Hills) for this intersection. Providing fair share funding towards a traffic signal is insufficient, since that is not the intersection modification that has been agreed upon.

104

The DEIR does not find an impact at this intersection under 2035 conditions. The LOS calculation sheets in Appendix F of the TIA indicate that a traffic signal is assumed at this intersection under 2035 conditions, even though Appendix E of the TIA indicates that the lane configuration and traffic control (all-way stop control) are the same as under 2018 conditions. All changes in roadway network assumptions should be stated clearly in the text of the report, and all tables and figures should be consistent with any noted changes.

The intersection should be evaluated under 2035 conditions with all-way stop control and with a roundabout, not with a traffic signal, since the timing of the roundabout construction is uncertain.

I-280 Northbound Off-Ramp and Page Mill Road (#14)

DEIR: No impact is found at this unsignalized intersection under 2018 or 2035 conditions. Under 2018 conditions, the intersection operates at LOS E both with and without the project, and the increased delay is one second. Because signal warrant analyses were only conducted for unsignalized intersections operating at LOS F, no signal warrant analysis is included in Appendix G of the TIA.

For the 2035 evaluation, Appendix E of the TIA shows no change to the lane configuration or traffic control at this intersection, although the LOS calculation worksheets indicate that a traffic signal is assumed under 2035 conditions.

Hexagon Comments: In general, any changes in the roadway network (lane configurations, traffic controls, signal phasing, etc.) between 2015 and 2018 or between 2018 and 2035 should be clearly stated in the TIA and the DEIR and all appendices should be consistent.

105

Because the intersection is already operating at LOS E during the AM peak hour and the increase in delay on the stop-controlled approach is only one second, there would not be a significant impact even if the more stringent LOS D standard were used for unsignalized intersections.

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Junipero Serra Blvd – Foothill Expressway and Page Mill Road (#17)

DEIR: The proposed mitigation measure at this intersection for both the 2018 and 2035 impacts is "Contribute fair share funding toward installation of an overlap signal phase for northbound and southbound right-turning vehicles and widening of southbound Junipero Serra to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane." The text on page 5.15-92 notes that this would allow southbound right-turning vehicles additional queuing space so southbound through vehicles do not block the right-turn lane. Under 2018 conditions, there would still be a significant and unavoidable impact even with this mitigation measure, although under 2035 conditions, this measure was found to reduce the impact to a less-than-significant level.

106

Hexagon Comments: The mitigation measure proposed is reasonable, but ignores the other changes that have been proposed for this intersection. The *Page Mill Expressway Corridor Study Report* recommends the addition of a third eastbound and westbound through lane on Page Mill Road between the I-280 interchange and Porter Drive (just east of Page Mill Road), as noted on Page 5.15-124 of the DEIR. Measure B does not provide sufficient funding for the entire Page Mill corridor project, including modifications to this intersection, so it would be reasonable for Stanford to make a fair share contribution to it. Because the DEIR's proposed mitigation does not fully mitigate the Project's impact at this intersection, a fair-share contribution to the Page Mill widening (possibly HOV lanes) at this intersection should also be included in the mitigation measure, in addition to the proposed changes to the Junipero Serra approach.

Bowdoin Street and Stanford Avenue (#34)

DEIR: No impact is found at this unsignalized intersection under 2018 or 2035 conditions. Under 2035 conditions, the intersection operates at LOS D without the project and at LOS E with the project during the PM peak hour. Because signal warrant analyses were only conducted for unsignalized intersections operating at LOS F, no signal warrant analysis is included in Appendix G of the TIA.

Hexagon Comments: As noted previously, the City's practice has been to use LOS D as the impact threshold for unsignalized intersections, even though there is no formal policy statement regarding unsignalized intersection impact criteria. If a more stringent LOS D threshold were to be used and if the peak hour signal warrant were met, then the project would result in a significant impact at this intersection. The Final EIR should include signal warrant analyses on Palo Alto unsignalized study intersections operating at LOS E.

107

If the finding of no significant impact were to be changed to a finding of significant impact (based on LOS E in the PM peak hour and a signal warrant analysis), installing a traffic signal at this location would not be recommended as a mitigation measure, due to its fairly close spacing with other signalized intersections on Stanford Avenue, at Peter Coutts Road and at Hanover Street. The City's preferred approach to this intersection would be a roundabout or a treatment other than a signal at this location.

El Camino Real and Embarcadero Road (#48)

DEIR: Significant impact found in 2035, but not 2018. Proposed mitigation measure is "Contribute fair-share funding toward the addition of a second northbound left-turn lane." Page 5.15-131 of the

108
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DEIR notes that VTA's Bus Rapid Transit (BRT) project has proposed a separate bus lane on El Camino Real, but not through this intersection. The DEIR concludes that it is not possible to determine what, if any, effect this mitigation measure would have on the BRT since there is no final design available.

Hexagon Comments: As part of the Preferred Scenario selected for Palo Alto's Comprehensive Plan Update, queue jump lanes (not exclusive bus lanes) in the curbside lane have been proposed for transit on El Camino Real. Is there be adequate right-of-way for both an additional northbound left-turn lane and queue jump lanes? Would it be possible to implement both? The DEIR notes that the City is "currently designing bicycle improvements at this intersection."

Alma Street and Charleston Road (#58)

DEIR: Significant impact found under both 2018 and 2035 conditions. Proposed mitigation is "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." The impact would remain significant and unavoidable after implementation of this mitigation.

Hexagon Comments: As part of the Preferred Scenario selected for Palo Alto's Comprehensive Plan Update, grade separation between Charleston Road and the Caltrain tracks has been proposed. Because the DEIR's proposed mitigation does not fully mitigate the Project's impact at this intersection, a fair-share contribution to the grade separation project should also be included in the mitigation measure.

Freeway Impacts (2018 and 2035 Conditions)

DEIR: The DEIR states that the project would result in significant and unavoidable impacts on four freeway segments under 2018 conditions and on 11 freeway segments under 2035 conditions. The impacted segments are on SR 85 and I-280. No specific mitigation measure is proposed, although it is noted that to the extent that vehicle trips are reduced to achieve the "no net new trips" standard and through applying any fees from exceeding the standard to alternative programs that reduce vehicle trips, the project's contribution to freeway congestion would also be reduced.

Hexagon Comments: The freeway segment analysis does not follow the methodology set forth in VTA's *TIA Guidelines* or in C/CAG's guidelines. According to VTA's *TIA Guidelines* (page 44), a freeway segment is said to have an impact if the level of service falls from LOS E or better to LOS F. If the segment is already operating at LOS F, then a project has an impact if the number of new trips added by the project is more than 1% of the freeway capacity.

Instead of referring to the level of service on the study freeway segments, the DEIR uses volume-to-capacity ratios (v/c) for both the 2018 and 2035 conditions. The TIA states there would be an impact if a project causes a freeway's v/c ratio to increase from less than or equal to 1.0 to greater than 1.0. If the segment is already operating at a v/c ratio greater than 1.0, then there would be an impact if the number of new trips added by the project is more than 1% of the freeway capacity. If the freeway evaluation used level of service instead of v/c ratio, there may be more freeway impacts than have been identified in the DEIR.

A few cities in Santa Clara County have identified contributions to regional freeway and transit facilities as mitigation measures for significant freeway impacts. VTA has developed a structure for a program of Voluntary Contributions to Transportation Improvements, which can be used by local agencies when preparing development agreements. The County has the opportunity to require

such a contribution to regional facilities in its development agreement as an additional condition if the "no net new trips" goal is not achieved.

VTP 2040 includes four highway projects that are relevant to the impacted freeway segments on SR 85 and I-280 and could be considered as candidates for a fair-share funding contribution for the freeway impacts identified in the DEIR. A contribution to improvements at the Palo Alto Intermodal Transit Station would also be appropriate to consider.

110
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Freeway Ramp Operations

DEIR: The DEIR notes that ramp queuing is not considered an environmental impact, but rather an operational consideration that is managed over time by Caltrans and local jurisdictions. The ramp analysis is presented for information purposes only.

In the text following the Existing, 2018, and 2035 off-ramp queuing evaluations, it is noted that the left-turn queue at the I-280/Page Mill Road southbound off-ramp would exceed the pocket storage length, but that the queue would be served within the total ramp storage and would not spillback into the freeway mainline.

111

Hexagon Comments: Regarding the I-280/Page Mill Road southbound off-ramp, the text is somewhat misleading. An extremely long exit lane is provided on I-280 for this off-ramp, and the queue extends a long way into that lane during the AM peak hour. Due to the length of that exit lane, it is true that through traffic is not blocked on the freeway, but the DEIR implies that there are no problems at this location since the "queue would be served within the total ramp storage." A more detailed description of existing and future conditions at this off-ramp is warranted. This off-ramp is analyzed as an all-way stop controlled intersection under 2035 conditions, even though the intersection analysis assumed the intersection would be signalized by 2035. As discussed above, the proposed improvement at this location is a roundabout.

Construction Impacts

DEIR: The DEIR finds that construction traffic would cause a significant impact and that it would be reduced to a less-than-significant level with the proposed mitigation measure.

Hexagon Comments: The City has expressed concern about the difficulty that its emergency responders have in meeting their response time targets when there are frequent lane closures or roadway detours due to construction. A new system for emergency responders is being implemented that will identify the best route for responders to take, based on current information about the roadway network. The mitigation measure should be revised to require the University to inform the City of all roadway changes immediately, so that the system is kept current at all times.

112

Transit Impacts

DEIR: The DEIR finds that the project would result in a less-than-significant impact on public transit based on (a) an analysis of transit delay and (b) the fact that "The proposed 2018 General Use Permit does not propose infrastructure changes outside the Project site and, thus, would not interfere with the ability of transit agencies to modify or expand service."

113

Hexagon Comments: The DEIR takes a very narrow view of whether the project would conflict with an adopted policy, plan, or program regarding public transit, or would otherwise decrease the performance or safety of such facilities. The DEIR does not present the analysis of transit capacity

as part of the impact analysis, but addresses that topic separately. See comments regarding the transit capacity analysis of Caltrain under "Key Concerns" above.

The City requested additional transit-related data and analysis in its NOP letter. Although some of the requested additional information regarding transit has been provided, the following requested items are not covered in the DEIR:

- Boardings, speed, and frequency of individual Marguerite lines;
- An evaluation of transit performance and efficiency as it relates to site design, mobility, and access;
- An assessment of the capacity, access, and operations of the Palo Alto Intermodal Transit Center (PAITC), including a capacity assessment of bus bays, layover facilities, and potential operating impacts to other transit providers using the PAITC, especially if Marguerite service is expanded.

The Final EIR should provide this requested additional data and analysis regarding services and facilities that serve Stanford-affiliated transit patrons.

Residential Streets

DEIR: The DEIR finds that the project would not substantially increase intrusion by traffic in nearby neighborhoods and that there would be a less-than-significant impact. Traffic impacts on residential streets were estimated using the Traffic Infusion on Residential Environment (TIRE) methodology. The threshold for an increase in traffic that would be noticeable to residents is a 0.1 increase in the index. The analysis was conducted for the College Terrace and Crescent Park neighborhoods, and the minimum daily volume increase required to increase the Index by 0.1 was calculated for a few roadway segments.

Hexagon Comments: In general, the TIRE methodology is somewhat problematic in evaluating traffic diversion impacts for a number of reasons. One reason is that it is based on average daily traffic (ADT), not peak periods of traffic, and sometimes residents are most sensitive to increases in traffic during commute hours when diversions are most likely to occur. Hexagon acknowledges, however, that no other tools have been developed that are widely considered superior to the TIRE index. The TIRE index uses a logarithmic scale, such that as ADT increases, larger proportional increases in additional project-related traffic are required in order to result in an increase to the index.

The DEIR notes that "on a daily basis Hamilton Avenue (just west of Lincoln Avenue) carries about 16% of the combined volume (University Avenue plus Hamilton Avenue); however, between 4:00 – 7:00 PM, it carries about 67%." This clearly indicates that a large amount of traffic is already being diverted to Hamilton during the PM peak period. Because of that diversion, ADT is already higher than it otherwise would be on Hamilton. And, because of that higher ADT, the number of additional vehicle trips needed to trigger a 0.1 increase in the TIRE index is also much higher than the amount required to trigger a change on the streets evaluated in the College Terrace neighborhood. For example, Table 5.15-28, "Crescent Park Neighborhood TIRE Index Results," shows that 1,025 additional vehicles per day would be needed on Hamilton Avenue (between Hamilton Court and Lincoln Avenue) to increase the index by 0.1, given that the daily traffic volume is 3,700. In other words, ADT would have to increase by 28% to trigger a 0.1 increase in the TIRE index.

What this boils down to is that because Hamilton Avenue already experiences a large amount of diverted traffic, the additional diverted traffic resulting from the 2018 GUP development is insufficient to cause a significant impact under the TIRE methodology. In fact, even if the estimate

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of 121 project-generated trips on the above-referenced segment of Hamilton Avenue were doubled or tripled, it would be considered a less-than-significant impact, since it would still be well below the threshold of 1,025 trips. Although some residents may take issue with this finding, the DEIR applies the TIRE methodology correctly.

114
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Emergency Access

DEIR: The DEIR finds that the project would not result in inadequate emergency access. This finding is based on the fact that the proposed 2018 GUP "would not result in any infrastructure changes outside the project site, and thus would not create fixed physical barriers to, or impede, emergency access."

115

Hexagon Comments: The rationale for this finding refers only to infrastructure changes outside the project site, but the DEIR should also consider any changes on campus due to the 2018 GUP development that would impede emergency access. In its NOP letter, the City asked that the DEIR evaluate impacts to response times for fire, rescue, and emergency medical services. This is not provided in the transportation (or public service) sections of the DEIR, and should be addressed in the Final EIR.

Bicycle and Pedestrian Facilities

DEIR: The DEIR states that the 2018 GUP would not result in a significant impact to bicycle and pedestrian facilities because it "would not result in any infrastructure changes outside the Project site and would [not] preclude implementation of planned bicycle or pedestrian facilities and, thus, would not create hazardous conditions where none exist today."

The DEIR used StreetScore, a proprietary methodology of Fehr & Peers, to evaluate Quality of Service (QOS) of bicycle and pedestrian facilities. The proposed intersection mitigation measures are evaluated for secondary impacts to bikes and pedestrians using StreetScore, and none were found to have a significant secondary impact.

116

Hexagon Comments: The StreetScore methodology used by Fehr & Peers is a newly developed tool and is not widely accepted as a standard evaluation tool in the traffic engineering community. Hexagon notes that the ratings do not seem to be that sensitive to lane geometry changes. In some cases, the rating given to bicycle or pedestrian facilities does not change at all as a result of the proposed mitigation measure. In other cases, adding a lane does not affect the Quality of Service because the intersection is already at the worst rating (4) and the mitigation measure is deemed to "maintain but not exacerbate current uncomfortable conditions." This is the equivalent of saying that if an intersection is already at LOS F that additional trips can't make it worse – which is clearly not permitted under the intersection impact criteria. In such cases, the Final EIR should address ways in which the bicycle and/or pedestrian facilities can be modified to improve conditions for cyclists and pedestrians as well as motorists.

DEIR: A bicycle capacity analysis of campus gateways was conducted (pp. 5.15-167 – 169), but not as part of the impact discussion. Peak hour bicycle volumes were converted into cyclists per minute to provide an indication of how intensely the campus gateways are being utilized. The analysis concluded that the anticipated growth in bicycle commuters under the 2018 GUP would not exceed capacity at these gateways.

117

Hexagon Comments: The City's NOP letter states that "the DEIR should identify critical intersections on bicycle routes that currently have inadequate integration of bicycle facilities and determine needed improvements." However, the DEIR does not address this. In addition to the

gateway capacity analysis, the design of bicycle facilities and their integration with routes used by Stanford commuters should be addressed. For example, Embarcadero Road is a daunting corridor for cyclists, but the analysis just says there's adequate capacity at the gateway on Galvez Street south of Arboretum Road, which is on the campus. Other corridors may also have issues.

117
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The Final EIR should address the access routes used by bicyclists, not just the campus gateways, and should expand the analysis to include safety, comfort and connectivity, as well as capacity. In order to meet the "no net new trips" goal, Stanford will need to further increase the bicycle mode share. One of the strategies put forth in the TIA for expanding the TDM program is to identify key improvements that would directly reduce the road stress for cyclists on access routes to campus, which should be included as part of the EIR.

DEIR: Separate from the impact discussion (i.e., not offered as a mitigation measure), The DEIR notes that Stanford will provide improvements to bike and pedestrian facilities on unincorporated land near Escondido and Nixon schools.

Hexagon Comments: The list of potential improvements suggested on page 5.15-112 of the DEIR should be reviewed to confirm that they reflect the most recent ideas regarding needed improvements for Safe Routes to School for these schools. The University should continue to coordinate with the City and the Palo Alto Unified School District to define and implement improvements that reflect the most recent Safe Routes to School recommendations. In addition, because development on campus can result in large bursts of new school children as residential projects are completed, it's important that the University remain responsive when new demands for school travel are generated by new development.

118

DEIR: Stanford also proposes in Chapter 8 of the DEIR to fund specified off-site bicycle improvements in Palo Alto, East Palo Alto, Menlo Park, and unincorporated San Mateo County. Stanford would apply for trip credits towards the "no net new trips" goal based on these bicycle facilities in all future years after the facilities are constructed. The proposal for Palo Alto is to connect existing facilities at Bol Park and the Stanford Perimeter Trail. "The improvements would be installed along Hanover Street, which would provide a continuous route through southern Palo Alto neighborhoods and the Stanford Research Park to the Stanford campus. (DEIR, p. 8-4)" Stanford would contribute up to \$250,000 in funding towards the design and implementation of bicycle improvements in the Hanover Street corridor, "which is the full estimated cost of these improvements".

119

Hexagon Comments: The proposal to provide better connectivity between the Stanford Perimeter Trail and the Bol Park Path makes good sense, since the Bol Park Path is a heavily used facility and provides a route from campus to Terman Middle School and Gunn High School. However, the specific details of the improvements proposed in the DEIR have not been accepted by the City as the most critical modifications needed to improve this bike corridor. Further, some of the specific elements of this project, as listed on page 8-4 of DEIR, may already be covered by the recent agreement between the City and the County regarding improvements at the intersection of Hanover Street and Page Mill Road. Stanford representatives should coordinate with Palo Alto staff to better define this project and ensure that it does not include elements that are already covered by the \$3.2 million agreement with the County but does include funding for elements that are still critically needed for upgrading this bikeway.

On-Campus Parking Supply and Off-Campus Restrictions

See comment under Key Concerns above.

120

DEIR: Stanford wants to exclude parking spaces at EV charging stations from the count of parking spaces allowed under the 2018 GUP. The rationale is that these spaces require turnover, such that other spaces are needed for the same cars when they are not charging.

Hexagon Comments: Since the number of EV charging stations is likely to increase substantially by 2035 as EV ownership rates increase, this will not be a trivial number of parking spaces in the future. Signs at charging stations say that "Vehicles Must Be Actively Charging" to park in these spaces, but how is that enforced? If someone parks their car at an EV charging station and plugs it in, do enforcement staff look to see if it is actively charging? How long do people have after their car is charged to move it? In many public garages, it is common for EV drivers to leave their cars parked in the space all day long, even if it does not take all day to charge it.

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Additional Comments

This section includes additional issues noticed by Hexagon and not addressed in any of the preceding sections.

2018 GUP, Background Conditions Report, page 4-58: Intersection improvements identified as mitigation measures for the 2000 GUP were divided into two tiers. A condition of the 2000 GUP "required Stanford to construct Tier 1 intersection improvements regardless of whether Stanford achieved the 'no net new trips' goal." A two-tier approach may also make sense for the 2018 GUP, with a condition of approval that requires a fair-share contribution towards improvements at the Palo Alto Intermodal Transit Station in order to accommodate 8-car trains for Caltrain service. The County could require such a contribution regardless of whether Stanford achieves the "no net new trips" goal because increased Caltrain capacity is so critical to further reductions to the SOV mode share and the projected increases in Caltrain ridership.

121

TIA, Part 1, Figure 5 , "Stanford University Employee Mode Share," provides information about the modes used by commuters coming from different geographic subareas. The information is extremely useful, but also raises questions about survey design and validation. For example, the figure shows a number of people walking from the North Bay (Marin, Napa, and Sonoma Counties). Stanford should continue to refine its survey process. Also, East Palo Alto is not identified in any of the geographic subareas. East Palo Alto should be identified on this figure and in Tables 7 and 8.

122

TIA, Part 1, Table 7, "Percent of Stanford Affiliates (Driving) by Geographic Area": The table indicates that Sunnyvale and Santa Clara are north of campus and would use Alpine Road and Sand Hill Road to access the campus from I-280. Was this error only made on the table or did the trip distribution and assignment actually incorporate this error?

123

TIA, Part 2, pages 103-104: The TIA states that "adjustments were made to the survey data to account for a known bias in the surveys. More detail on how these biases were adjusted for can be found in the 2018 GUP TIA Part 1." Part 1 does not include detail on these adjustments. This information should be added to the TIA.

124

TIA, Part 2, page 134: A reference is made to "C/CAG's bus routes." This should be corrected to read "SamTrans's bus routes."

125

5.2.1.9 Responses to Comments from City of Palo Alto

A-PA-1 No specific comments on the NOP are raised in this comment, however, any specific comments on the NOP identified in the comments that follow are responded to in the correlating responses that follow.

The County acknowledges the City’s desire for meaningful conditions of approval and mitigation measures and appreciates the City’s willingness to engage with the County on these issues.

A-PA-2 Please see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

A-PA-2 Please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study; and Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

A-PA-3 The comment requests that development be staged as housing is built and transportation solutions are implemented.

With regard to housing linkage, please see Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing.

Regarding linking development to the implementation of transportation solutions, the primary mitigation strategy for the Project’s transportation impacts is application of the “no net new commute trips” standard. (See Draft EIR Impact 5.15-2 and Mitigation Measure 5.15-2, p. 5.15-74 *et seq.*)¹¹ This is consistent with Stanford Community Plan policy SCP-C 1. If this standard is not met, then Stanford must contribute its fair share to certain intersection improvements. Nevertheless, the Draft EIR concluded that this impact would be significant and unavoidable. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an up-front fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Whether development under the Project should be contingent upon (i.e., linked to) the implementation of certain transportation solutions is an issue for the County Board of Supervisors to consider when it determines whether, and under what conditions, to approve the Project.

¹¹ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

See also Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Housing Linkage Ratio and Timing. Please also see Master Response 8: EIR Alternatives, Topic 2 Additional Detail on Potential Alternatives.

- A-PA-4 Impacts of the Project on housing supply is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Nevertheless, on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which included a new impact (Impact 5.17-1) that discussed the indirect impacts of off-campus housing associated with the Project. The Recirculated Portions of Draft EIR also included two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.
- A-PA-5 Please see Master Response 10: Affordable Housing, generally, and in particular, Topic 3: Future Contribution to Affordable Housing Fund, and Topic 5: Geographical Distribution of Affordable Housing Funds.
- A-PA-6 The City's request is acknowledged. Please see Master Response 10: Affordable Housing, Topic 6: Regional Housing Needs Assessment Affordable Housing Credit.
- A-PA-7 The commenter's request that Stanford provide technical and financial support to partner organizations is noted. Regarding the comment about adjusting the no net new commute trips policy, please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- A-PA-8 The commenter is referred to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for detailed information on how Stanford will mitigate the transportation impacts of its additional development and population growth under the proposed 2018 General Use Permit; Topic 6: No Net New Commute Trips Standard for a discussion about Stanford's existing and proposed TDM programs (including Marguerite shuttles) and how compliance with the standard is measured; Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy; and Topic 12: Transit and Bicycle Capacity for details on Caltrain capacity assumptions.
- A-PA-9 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for an explanation of the Community Plan's flexible approach rather than specifying individual TDM measures to achieve that standard. The Stanford Community Plan establishes policies that provide Stanford flexibility to select specific transportation demand management components for

implementation, and that allow Stanford to modify its program based on changes in user needs and available services over time (see, e.g., SCP-C 5).

If Stanford does not achieve the no net commute trips standard, Draft EIR Mitigation Measure 5.15-2 requires a monetary payment based on Stanford's fair share of capital improvements to intersections where significant effects of the proposed Project could occur. The County Planning Office will determine the priorities for use of any payments collected from Stanford in consultation with affected jurisdictions including the City of Palo Alto. That selection process will occur in the future for the following reasons:

First, it is unknown whether the no net new commute trips standard will be exceeded during the life of the permit.

Second, it cannot be known now whether an exceedance might occur or to what extent the baseline will be exceeded. The amount of the payment available to the County for use in funding mitigation will depend upon the extent of the exceedance.

Third, because the timing of when or whether an exceedance occurs cannot be known, it cannot be known which specific improvement projects and trip reduction programs (if there are no feasible improvement projects) would be ready for funding.

In background information provided in its Final Proposed Updates to the CEQA Guidelines (November 2017), the Governor's Office of Planning and Research (OPR) explains that, under CEQA, while the overall plan for mitigation cannot be deferred, details of such mitigation plans can be provided later in appropriate circumstances:

"Practical considerations, however, sometimes preclude development of detailed mitigation plans at the time of project consideration. In such cases, courts have permitted lead agencies to defer some of the details of mitigation measures provided that the agency commits itself to mitigation and analyzes the different mitigation alternatives that might ultimately be incorporated into the project." (See, e.g., *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d 1011, 1028–1030.)

In its July 2, 2018 proposed "15-Day" revisions to CEQA Guidelines section 15126.4(a)(1)(B), OPR interprets existing case law as follows:

"The specific details of a mitigation measure, however, may be developed when it is impractical or infeasible to include those details during the environmental review, provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential actions that can feasibly achieve that performance standard and that will be considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in

implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.”

Draft EIR Mitigation Measure 5.15-2 meets these case-law based proposed requirements. By adopting this mitigation measure, the County will have committed itself to address the transportation impacts of the proposed 2018 General Use Permit, and specified the no net new commute trips standard as the performance standard that the mitigation will achieve. The mitigation measure also lists the potential actions to be considered, analyzed and potentially incorporated into the mitigation measure. The physical infrastructure improvements that may be funded are listed in the measure, as well as a description of the types of trip reduction measures that can be funded. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Further, to be conservative, the Draft EIR also recognizes the potential that the mitigation program would not be successful for reasons beyond the County’s control. For example, many of the physical intersection improvements identified in the Draft EIR are within the jurisdiction and control of other agencies. The County also cannot ensure that sufficient funds are collected from others to pay for some of the improvements, and the County cannot ensure that other jurisdictions will decide to carry out the improvements. For these reasons, the traffic impacts of the proposed Project are considered significant and unavoidable.

A-PA-10 Please see Chapter 2 in this Response to Comments Document, which addresses revisions to Section 3.14, Public Services Impact 5.13-1, Impact 5.13-2 and Impact 5.13-5 to recognize that Stanford may contract with other qualified fire protection/EMS service providers if it does not maintain its contract with the Palo Alto Fire Department. This revision does not alter the findings of the Draft EIR.

Stanford completed the negotiation of a new, comprehensive fire services agreement with the City of Palo Alto in August 2018. The agreement commences as of July 1, 2018 and is for a five-year term, with options to automatically renew.

The comment also indicates that Stanford does not have access to the California Master Mutual Aid Agreement for fire protection and suppression, but rather access to only available via public fire departments who are participants in the agreement; and would have access to EMS ambulance transportation services through Santa Clara County Ambulance unless a new contract can be executed.

These comments are acknowledged, but require no revisions to the Draft EIR.

This comment is acknowledged regarding Stanford needing to contract with another qualified entity(ies) for fire protection/EMS services should the Stanford's existing contract extension with the City not be renewed.

A-PA-11 Please see Master Response 7: Flooding/Detention. With respect to effects of climate change related to flooding, it would be speculative to assess potential effects that climate change may have on future stormflows and flooding with any level of certainty. However, as explained in Master Response 7: Flooding/Detention, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, the proposed 2018 General Use Permit, in combination with any remaining authorized unbuilt development under the 2000 General Use Permit, is only estimated to account for 18 percent of Stanford's remaining (as of 2018) detention capacity in the San Francisco watershed, and 6 percent of Stanford's remaining detention capacity in the Matadero watershed. As a result, there would still be substantial remaining Stanford detention capacity in the event climate change were to have a measurable effect on stormflow volumes at the Project site, and thus, under future climate change there would continue to be no effect from the Project on peak-runoff flows from the site and downstream flooding.

A-PA-12 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting.

With respect to the comment about Table 5.15-12 in the Draft EIR Transportation and Traffic section (page 5.15-65), this table represents a development summary of all remaining unbuilt Stanford housing and academic space (as of December 2015) authorized under the 2000 General Use Permit that the Draft EIR assumes would be built by 2018, and is included in the 2018 environmental baseline. Please see Table 5.15-13 on page 5.15-66 in the Draft EIR, which accounts for the Escondido Village Graduate Residences project (2,020 beds/units), which, at the time of analysis, was the only noteworthy Stanford project authorized under the 2000 General Use Permit which was known would not be completed by 2018 (that project will be completed in 2020), and therefore, its trips were accounted for in the Cumulative 2035 scenario.

The comment inquires if there is a conflict between Draft EIR Table 5.15-12 (page 5.15-65) - which represents a development summary of all remaining unbuilt Stanford housing and academic space (as of December 2015) authorized under the 2000 General Use Permit that was assumed in the Draft EIR to be built by 2018 (i.e., everything except EV Graduate Residences), and the statement in Draft EIR Chapter 3, Project Description (page 3-19) - which indicates that Stanford may not have received project-specific approval for construction of all

development under the 2000 General Use Permit when the County considered the proposed 2018 General Use Permit. Reasonable assumptions regarding the amount of baseline or cumulative development were made in this EIR. The transportation analysis is conservative in that it assumed the maximum amount of authorized development that was reasonably expected to be in built by 2018 would be in the environmental baseline, and consequently, baseline traffic volumes were higher in the EIR than if assumed otherwise. By assuming a higher baseline level of traffic, a smaller incremental change caused by the Project will trigger a significant impact at an intersection.

Please see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how travel demand forecast for growth outside the Project site was developed for the 2018 environmental baseline scenario for the Transportation and Traffic section of the Draft EIR.

A-PA-13 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 2: Approach for Cumulative Scenario. Please also see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how travel demand forecast for growth outside the Project site was developed for the 2035 Cumulative scenario for the Transportation and Traffic section of the Draft EIR.

A-PA-14 As part of the traffic forecasting process, the future year model land uses were reviewed to ensure that approved projects and projects for which a traffic study has been prepared within the Cities of Palo Alto, Menlo Park and East Palo Alto were reflected. The Palo Alto Comprehensive Plan Final EIR Preferred Alternative land uses compare well to the land uses represented in the 2040 VTA model, as adjusted for use in the 2018 General Use Permit EIR. Because the Comprehensive Plan only extends until 2030, while the VTA model extends until 2040, the best comparison between the two sets of assumptions is based on the yearly average rates of growth for households, residents, and jobs. The comparisons of the two models, presented in the table below, illustrate that the VTA projections are similar to that of the Palo Alto Comprehensive Plan projections, and in fact are conservative in that the VTA projections generally fall at the high end of the ranges provided in the Palo Alto Comprehensive Plan. Further, the recent decision by the Palo Alto City Council to reduce the allowable growth in non-residential space allowed by the Comprehensive Plan, makes the VTA projections yet more conservative.¹²

¹² See <https://www.paloaltoonline.com/news/2018/07/30/palo-alto-tightens-the-limit-on-office-development>.

Metric	Palo Alto Comprehensive Plan 2030 Preferred Scenario (in the Comprehensive Plan Final EIR)	VTA Model Run for Stanford 2018 General Use Permit Year 2040
City of Palo Alto Households	3,545-4,420 (average of 222 to 276 new units per year)	6,484 (average of 270 new units per year)
City of Palo Alto Residents	8,435 – 10,455 (average of 527 to 653 new residents per year)	16,793 (average of 700 new residents per year)
City of Palo Alto Jobs	9,850-11,500 (average of 615 to 718 new jobs per year)	15,322 (average of 638 new jobs per year)

Please also see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 2: Approach for Cumulative Scenario, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary.

A-PA-15 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 2: Approach for Cumulative Scenario, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary.

A-PA-16 On September 1, 2018, the County completed a Supplement to the 2009 Sustainable Development Study. Please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study; and Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

A-PA-17 Please see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

A-PA-18 The distribution of academic facilities and housing in the proposed 2018 General Use Permit application represents the best available information about where such facilities would be placed on the Stanford campus. No other information is available to estimate how academic square footage or housing beds/units might be redistributed in the future.

The 2000 General Use Permit contains conditions establishing allowable deviations for redistribution of academic development within the various development districts (condition E.2), and the redistribution of housing among development districts (condition F.2 through F.4). Condition F.7 also allows Stanford to seek approval of housing beyond the initial increment of 3,018 units/beds. The conditions include provisions requiring environmental review and approval by the Planning Commission.

For example, Stanford applied for and obtained Planning Commission approval to add 1,450 beds to the East Campus Development District.¹³ This increment of

¹³ https://www.sccgov.org/sites/dpd/DocsForms/Documents/7165_PC_20160324_Item8_StaffReport.pdf.

additional housing was above the total number of beds/units that the 2000 General Use Permit initially authorized. In connection with its approval, the Planning Commission considered an Addendum to the 2000 Community Plan/General Use Permit EIR. The Addendum considered every impact topic identified in the 2000 EIR to evaluate whether the additional housing in the proposed location would result in a new or substantially more severe environmental impact. The Addendum was supported by traffic studies to determine whether the additional housing would bring vehicle trips to this area of the campus that exceeded the traffic projections in the 2000 EIR. The Addendum also was supported by site-specific evaluations of visual impacts and construction noise. All of these documents were available for public review, and Palo Alto was provided notice of the pending approval pursuant to the 1985 Land Use Policy Agreement between Santa Clara County, Palo Alto and Stanford.

In addition to allowing Stanford to request additional housing units/beds, the 2000 General Use Permit identified the process to be used to re-distribute academic and academic support facility square footage and housing units/beds from one Development District to another. 2000 General Use Permit Conditions F3 through F5 address redistribution of housing. Conditions E2 through E4 address redistribution of academic and academic support facility space. These conditions prohibit redistribution to the Foothills, Lathrop or Arboretum Development Districts. They limit redistribution of housing to the DAPER Development District to up to 350 units. Otherwise, they allow up to a 20% increase in housing and a 20% or 20,000 square foot increase in academic and academic support square footage in each Development District, as long as a corresponding amount of housing or academic square footage is deducted from another Development District. Proposed redistributions above these triggers must be reviewed and approved by the Planning Commission along with a traffic study and an environmental assessment.

As with the housing increase, a recent project can be used to illustrate how this redistribution worked under the 2000 General Use Permit. In 2007, Stanford sought Planning Commission approval to redistribute academic square footage from the East Campus Development District to the Quarry Development District to enable construction of the Center for Academic Medicine. In connection with that proposal, traffic engineers at Fehr & Peers submitted studies demonstrating that the redistribution would not increase the amount of traffic at any offsite intersections compared to the assumptions in the 2000 Community Plan/General Use Permit EIR. County staff had the studies peer reviewed by independent traffic engineers at AECOM, who agreed with the conclusions. County staff prepared an Addendum to the 2000 EIR to document the analysis showing the redistribution would not result in any new or more severe environmental impacts. The County Planning Commission approved the redistribution, and Menlo Park appealed the Planning Commission decision to the Board of Supervisors. The

Board considered the expert analysis supporting the approval and affirmed the Planning Commission’s decision.

No redistribution proposed under the 2000 General Use Permit was found to result in a new or substantially more severe environmental effect.

When the County considers the Project, one of the issues it will address is the process that must be followed to redistribute development among the various development districts and to authorize additional development beyond what may initially be authorized under the 2018 General Use Permit. At this point, it is unknown whether that process would be the same as under the 2000 General Use Permit. Whatever process is required, further review would be required under CEQA if the proposed changes would result in any new or substantially more severe environmental impacts.

A-PA-19 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity. See also Responses to Comments A-PA-20 through A-PA-24, below.

A-PA-20 The site-specific locations of future building projects are not known. The Draft EIR addresses this uncertainty by assuming that development could occur anywhere within the Development Districts where new academic square footage and/or housing units are allowed.

The commenter requests additional information about the potential building sites for 200,000 net new square feet of academic and academic support facilities anticipated to be developed in the DAPER and Administrative Development District, and seeks to understand impacts on views and visual character of the area, loss of useable open space, tree removal, and traffic and circulation associated with parking changes. The specific sites upon which new buildings might be developed under the 2018 General Use Permit are not known. The Draft EIR addresses this uncertainty by conservatively assuming development could occur on all locations within this Development District.

The Draft EIR addresses impacts on visual resources in Section 5.1. On page 5.1-11 and 5.1-12, the Draft EIR recognizes that development within the Academic Growth Boundary “would inevitably block certain views of the foothills from areas immediately adjacent to the new buildings.” However, the Draft EIR recognizes that views of the foothills already are restricted and further development of the campus would not significantly diminish key scenic vistas. In this manner, the Draft EIR determined that development at all sites within the DAPER and Administrative Development District would result in a less-than-significant impact on scenic vistas. On pages 5.1-13 and 5.1-14, the Draft EIR addresses the effects on visual quality and character from development of up to 200,000 square feet of new academic and academic support space in the DAPER

and Administrative Development District. The discussion evaluates the visual effects of potential development of each portion of this District, including development on the interior spaces, development on existing athletic and recreation spaces, and development on the open area known as Masters Grove. The Draft EIR recognizes that development of land close to El Camino Real would be noticeable and would diminish the relatively open quality of this area. On pages 5.1-16 and 5.1-17, the Draft EIR also describes the processes the County uses to review individual development projects to ensure they are compatible with their surroundings. Based on this analysis, the Draft EIR concludes that development of up to 200,000 square feet in the DAPER Development District would not result in a significant adverse effect on the visual character of the District and its surroundings.

Tree removal is discussed on pages 5.3-45 and 5.3-46 in Section 5.3 Biological Resources of the Draft EIR. Impacts from tree removal are addressed on a campus-wide basis through policies and programs designed to ensure that protected trees are replaced at a ratio of 3:1 for oaks and 1:1 for other protected trees; alternatively, Stanford may submit a Vegetation Management Plan for the entire campus that provides for the same or greater level of tree preservation, subject to County review and approval.

Other portions of the Stanford campus that are adjacent to the City of Palo Alto include the East Campus Development District, the Quarry Development District, and the West Campus Development District. The Draft EIR addresses visual impacts associated with development in each of these development districts under Impact 5.1-3 on pages 5.1-13 through 5.1-17.

The Draft EIR explains that new development within the East Campus Development District would not change the visual character of this portion of the campus. In addition, new buildings are not likely to be constructed within this District along El Camino Real and Stanford Avenue given that these edges of the District recently were developed with new faculty and staff housing. The Draft EIR explains that new housing and academic and academic support facilities added to the Quarry Development District would alter the visual character of that district; however, these new buildings would extend the urbanized landscape that exists directly across Quarry Road. The Draft EIR recognizes that the amount of development proposed for the West Campus Development District is relatively small, and that small amount of development would not substantially change the visual character of the area.

The Draft EIR also describes the County approval processes for specific building projects that ensure visual compatibility is considered at the time of approval, which is a discretionary approval by the County subject to appeal to the County Planning Commission and Board of Supervisors.

Based on these factors, the Draft EIR concludes the proposed development associated with the Project would not result in a significant impact to the visual character of the site and its surroundings. The Draft EIR does, in one paragraph, describe Stanford's internal guidelines and policies that the university publishes for use by design consultants, contractors, and Stanford project managers. These policies are subject to constant revision and interpretation. For this reason, the Draft EIR's conclusions do not depend upon Stanford's internal policies and guidelines. Rather, Stanford's development proposals are reviewed by the County through the Architecture and Site Approval or other approval processes.

See also Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity.

A-PA-21 The comment is acknowledged. The consultation process with adjacent cities is a policy issue that the County Board of Supervisors will consider when determining whether, and under what conditions, to approve the Project.

Pursuant to the 1985 Land Use Policy Agreement between the County, the City of Palo Alto, and Stanford, the County provides notice to the City of Palo Alto whenever it considers a discretionary approval for a building project on the Stanford campus. The Draft EIR provides a general description of the County's Architecture and Site Approval (ASA) process on page 5.1-8. One of the findings that must be made before the County may grant The County's ASA site-specific approval process is that the "[a]pppearance of proposed site development and structures, including signs, will not be detrimental to the character of the surrounding neighborhood or zoning district. (County Zoning Ordinance, § 5.40.040, subd. D.)

The Draft EIR does not identify specific performance standards or mitigation measures in the form of screening or design guidelines because it does not conclude development at the edges of the campus nearest to Palo Alto would result in significant visual impacts to Palo Alto or to any offsite viewer. As required by condition L.1 of the 2000 General Use Permit, Stanford prepared and the County Planning Office approved the adopted El Camino Real Frontage Plan that establishes setbacks and height requirements within 100 feet of El Camino Real. An overview of this Plan is provided in the Draft EIR (p. 5.1-10). Please note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analyses of Additional Housing Alternative A and Additional Housing Alternative B, on pages 2-64, 2-65, 2-270, and 2-271 of the Recirculated Portions of the Draft EIR, recognize that these alternatives could include modification of the El Camino Frontage Plan for additional faculty/staff

housing that may occur in the DAPER and Administrative Development District and/or Quarry Development District.

The Stanford Community Plan calls for increased density and intensity of the campus lands within the Academic Growth Boundary and requirements to provide landscape buffers to screen new buildings from view, or height limits and other restrictions to reduce density or intensity of new construction inside the Academic Growth Boundary could be contrary to these policies. On page 5.10-14, the Draft EIR explains: “Growth proposed by the Project would thus be consistent with the Growth and Development policies of the Stanford Community Plan by reducing potential environmental effects that could result from development of Stanford lands outside the Academic Growth Boundary.”

A-PA-22 On pages 5.10-5 through 5.10-9, the Draft EIR summarizes the policies of the Stanford Community Plan. The Community Plan does not allow new structures to be built within the Arboretum or other Campus Open Space, and Stanford does not propose to change these policies.

A-PA-23 The commenter states that the Project could result in significant adverse effects to views along SR 82 because existing setbacks are not sufficient and the proposed academic development in this area may be placed in vegetated or open areas of the site. The County recognizes that perception of visual impacts can be subjective, and that opinions may differ as to whether an impact is significant. Please see Response to Comments A-PA-20 and A-PA-21, above, for a full explanation why the Draft EIR concluded that development of open areas and recreation fields along El Camino Real would not result in a significant impact to the visual character of the site and its surroundings. See also Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals; and Master Response 5: Project Description, Topic 1: Level of Specificity.

A-PA-24 The significance standard used in the Draft EIR for light/glare impacts is whether the Project would “[c]reate a new source of substantial light or glare that would adversely affect day or nighttime views in the area. This differs from the City’s requested “no offsite illumination” standard.

Please also see Response to Comment O-SCAS-3 for a description of Stanford’s lighting guidelines to reduce offsite illumination.

A-PA-25 As stated under Impact 5.2-1 (p. 5.2-30) in the Draft EIR, the average construction scenario assumed construction of an annual average of approximately 225,500 square feet of new building construction, 50,300 square feet of building demolition, and excavation of approximately 62,100 cubic yards of soil per year. This annual average is based on the average annual construction and demolition that occurred on the Project site under the 2000 General Use Permit from fiscal year 2001 to 2015. This includes nearly-constant construction and is assumed to be

a reasonable estimate for future construction activity. In addition, mobile emission factors conservatively assume the vehicle fleet for calendar year 2030, which is five years before full buildout is anticipated to occur. Also, please note that CEQA does not require EIRs to present a worst-case analysis. See *Towards Responsibility in Planning v. City Council* (1988) 200 Cal.App.3d 671.

The EIR air quality analysis may rely on reasonable assumptions about future conditions, such as reasonable assumptions included in air quality modeling, without guaranteeing they will be implemented. See *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018. Nevertheless, the following three measures listed in the Project Description on page 3-18 of the Draft EIR were incorporated into the air quality analysis:

- During the life of the 2018 General Use Permit, Stanford would meet final California Air Resources Board Tier 4 standards for all construction equipment, except for chainsaws and paving phase equipment;
- All Marguerite buses would be electric by 2035; and
- 70 percent of Stanford Land Buildings and Real Estate and Bonair fleet vehicles would be electric by 2035.

Stanford will implement the first measure, pertaining to Tier 4 equipment, through its construction contracts for individual projects under the proposed 2018 General Use Permit. Progress toward the other two measures will be reported to the County through annual reports.

A-PA-26 As noted in Figure 5.2-1, “Residential areas are also within the Project Site vicinity and considered sensitive receptors.” Nevertheless, in response to this comment, Figure 5.2-1 is revised to more clearly show on- and off-site sensitive receptors, including residences. The revised figure does not change the Draft EIR air quality analysis or impact conclusions. Please see Chapter 2 in this Response to Comments Document for the revised Figure 5.2-1.

A-PA-27 Tier 4 construction equipment is becoming increasingly available due to both engine manufacturer standards (Off-Road Compression-Ignition Engines and Equipment Regulation) and statewide fleet regulation requiring turnover and/or emission control installations (In-use Off-Road Diesel-Fueled Fleets Regulation). In its application for the Project, Stanford agreed to meet final Tier 4 standards for all construction equipment except chainsaws and paving phase equipment through its construction contracts for individual projects through the duration of proposed 2018 General Use Permit. (See Draft EIR, pages. 1-4, 3-27.) Consequently, no air quality analyses from the Draft EIR need to be revised. Among other things, the conditions of the 2018 General Use Permit will require Stanford to comply with all elements of the Project as described in the application.

- A-PA-28 The Oval, Palm Drive, and the Main Gate are landscape elements located in the Arboretum. The Arboretum is designated by the Stanford Community Plan as Campus Open Space. The Community Plan prohibits new structures in Campus Open Space, and therefore the Project would not cause adverse effects on cultural resources that may be present in Campus Open Space. If, in the future, a building project that might affect historic features in Campus Open Space were proposed, such a building project would be subject to additional analysis under CEQA. See also Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.
- A-PA-29 See Responses to Comments A-PA-30 to A-PA-38 below, which address the specific issues under this comment.
- A-PA-30 As discussed in the Draft EIR Section 5.9, Hydrology and Water Quality, on page 5.9-8, the Project site is located within the 580-square-mile Santa Clara Valley Groundwater Basin. The Draft EIR also notes on page 5.9-9 that Stanford's five active groundwater supply wells serving the General Use Permit area withdraw groundwater from the San Francisquito Cone, a smaller groundwater basin within the Santa Clara Valley Groundwater Basin located along the boundary between the Santa Clara Plain and San Mateo Plain subunits.
- A-PA-31 For informational purposes, the nearest existing groundwater production well is Peers Park Well, located approximately 0.4 miles northeast of Stanford Well No. 5, in Palo Alto. The next nearest existing production wells are all located over one mile from the nearest Stanford wells (i.e., USGS, Menlo College and Hale Wells in Menlo Park, and Rinconada, Palo Alto Library, Palo Alto Eleanor Park, Fernando and Matadero Wells in Palo Alto).¹⁴
- A-PA-32 As indicated in Draft EIR, Hydrology and Water Quality, page 5.9-8, the California Department of Water Resources (DWR) Bulletin 118, Santa Clara Valley Groundwater Basin, San Mateo Subbasin describes groundwater level trends in both the Santa Clara and San Mateo Subbasins as stable. Groundwater levels recovered substantially from 1960s during the 1970s and 1980s, when Stanford (and Palo Alto) connected to the regional SFPUC potable water system and substantially reduced groundwater pumping.
- As discussed in the Draft EIR, Hydrology and Water Quality (page 5.9-3) and Utilities and Service Systems (page 5.16-3), Stanford groundwater pumping has continued for irrigation water supply, supplementing its surface water diversions supply, particularly during droughts. However, groundwater pumping levels have never returned to the pre-1970 levels when groundwater was used for potable water supply. Groundwater is used at Stanford to some extent every year, more

¹⁴ Based on *Gloria Way Water Well Production Alternatives Analysis & East Palo Alto Water Security Feasibility Study*, City of East Palo Alto, November, 2012.

during droughts; however, groundwater levels remain steady, recovering quickly after heavier drought usage periods.

Stanford tracks static groundwater elevation in its groundwater wells. A spreadsheet of historical groundwater elevations and summary charts are included in Appendix GWL in this Response to Comments Document.

A-PA-33 Please note that there was a typographical error in Draft EIR, Utilities and Service Systems Table 5.16-2 (Summary of Projected Dry Year Supply and Demands) on page 5.16-18, in which the portion of projected water demands that would be met by groundwater under buildout of the proposed 2018 General Use Permit were inadvertently labeled as demands that would be met by surface water. The corrected version of Table 5.16-2 is presented in Chapter 2 in this Response to Comments Document; this correction does not change the Draft EIR's conclusions regarding water supply impacts. It should be noted the corresponding information in the WSA (Table 3-1, p. 17) is correct as originally presented.

As shown in revised Draft Table 5.16-2, and WSA Table 3-1, groundwater use under buildout of the proposed 2018 General Use Permit is projected at 0.23 million gallons per day (mgd) during normal years; 0.48 mgd during single dry years and during the first year of a multiple-year drought; and 1.02 mgd during the subsequent years of a multiple-year drought. The groundwater would be used in combination with local surface supplies for landscape irrigation. Calculating groundwater usage as a percentage of total non-potable water demands, groundwater usage under the proposed 2018 General Use Permit is projected to be 17 percent during normal years; 34 percent during single dry years and during the first year of a multiple-year drought; and 94 percent during the subsequent years of a multiple-year drought. This is consistent with the groundwater usage for Fiscal Year (FY) 14-15 noted in the comment, which was 88 percent of the total irrigation demands in that year during prolonged drought conditions, as shown in Table 2-3 of the project WSA.

Further, the statement in the Draft EIR (p. 5.9-26) that irrigation demand under the proposed 2018 General Use Permit is not expected to change substantively as compared to baseline conditions is consistent with the analysis in the WSA. In particular, the Draft EIR (p. 5.9-26) and WSA (page 12) explain that while irrigation demands fluctuate widely from year to year due to the variability of the quantity and timing of wet-season rainfall, irrigation demand is not expected to increase overall under the 2018 General Use Permit. However, the Draft EIR (page 5.16-17) and the WSA note that irrigation demand is conservatively assumed to increase by 10 percent under the 2018 General Use Permit for purposes of the analysis.

Moreover, the 10 percent increase under the proposed 2018 General Use Permit is reflected in Table 3-1 of the WSA, which shows that total non-potable demand is

estimated to increase under the 2018 General Use Permit as compared to baseline conditions by 10 percent in normal years (from 1.23 to 1.35 mgd), in single dry years and the first year of a multiple-year drought (from 1.29 to 1.42 mgd), and in the subsequent years of a multiple-year drought (from 0.98 to 1.08 mgd).

Table 3-1 of the WSA shows the estimated increase in groundwater usage under the proposed 2018 General Use Permit as compared to baseline conditions in normal years (from 0.11 to 0.23 mgd), in single dry years and the first year of a multiple-year drought (from 0.35 to 0.48 mgd), and in the subsequent years of a multiple-year drought (from 0.92 to 1.02 mgd).

A-PA-34

In 2016, Stanford completed an investigation of its sustainable groundwater pumping (Luhdorff & Scalmanini, 2016); see Appendix PMP in this Response to Comments Document. This technical report evaluated the sustainability of groundwater pumping as part of an overall strategy of integrating groundwater with local surface water and imported water to meet water requirements for Stanford. The report evaluated two pumping scenarios: 1) using groundwater to augment current sources of supply in all water years and 2) short-term increased groundwater pumping in dry years to offset decreased local surface water and/or imported water availability. The report explained that term “sustainability” is an operating condition under which groundwater levels are not chronically declining (indicative of groundwater overdraft) and not chronically depressed, such that either seawater intrusion, due to a gradient reversal for flow from San Francisco Bay, or subsidence would be induced.

The report used an empirical analysis based on extensive historic data correlating groundwater levels and recovery with the amount of groundwater pumping within the San Francisquito Cone. The report concluded that groundwater pumping levels of at least 1,700 AFY could be maintained on a regular basis without inducing chronic water level declines, and it further explained that the empirical data indicated that even local pumping as high as 2,000 AFY may be sustainable. In addition, the report concluded that the empirical evidence suggested that an aggregate pumping rate for the San Francisquito Cone of up to 5,000 AFY for 1 to 2 years during drought conditions would cause temporary but not chronic declines, as water levels would recover with reduced pumping.

As shown above in revised Table 5.16-2 in Chapter 2 in this Response to Comments Document, the projected use of groundwater under the proposed 2018 General Use Permit would be 258 AFY (0.23 million gallons per day) under normal year conditions. This represents only 15 percent of the sustainable local pumping average of 1,700 AFY and leaves a remaining pumping amount of 1,442 AFY. The projected use of groundwater under the proposed 2018 General Use Permit would be 538 AFY (0.48 million gallons per day) during single-year dry conditions and the first year of a multi-year drought, and 1,143 AFY (1.02 million gallons per day) under prolonged drought conditions. These

temporary conditions are below the long-term sustainable pumping average of 1,700 AFY and are substantially below the 1- to 2-year drought figure of 5,000 AFY as discussed in the sustainable pumping report.

Lastly, the comment notes that Stanford's wells have a combined pumping capacity of 4,450 AFY, but this figure represents merely the maximum amount that can physically be pumped from the wells, and does not reflect the estimated demands of the proposed 2018 General Use Permit.

A-PA-35 As originally discussed in the Draft EIR, and further substantiated in Response to Comments A-PA-33 and A-PA-34, above, groundwater pumping levels of at least 1,700 AFY can be maintained on a regular basis without inducing chronic water level declines. Furthermore, groundwater demand for irrigation under the proposed 2018 General Use Permit is not expected to change substantially as compared to baseline conditions. The projected use of groundwater under the proposed 2018 General Use Permit under normal year conditions, single-year dry conditions and the first year of a multi-year drought, and under prolonged drought conditions would be below the long-term sustainable pumping average of 1,700 AFY. As such, the projected groundwater use that would occur under the Project could be safely withdrawn without causing excessive drawdown in the aquifer, that could adversely impact the operation of other groundwater wells.

Consequently, as discussed in Impact 5.9-4 in the Draft EIR, no mitigation is required to address groundwater use at the campus under the proposed 2018 General Use Permit. It should be noted, however, that the issue of building new development within the Unconfined Zone on the campus, and the related effects on groundwater recharge, are also addressed in Impact 5.9-4 in the Draft EIR, and mitigation is included in the EIR (Mitigation Measure 5.9-4) to continue implementation of Stanford's groundwater recharge plan to ensure there would be no adverse effects on underlying groundwater levels.

A-PA-37 As discussed in the Draft EIR, Utilities and Service Systems, page 5.16-1, Stanford currently receives the entirety of its potable water from the SFPUC; and this would continue to be the source of potable water under the proposed 2018 General Use Permit. As under existing conditions, Stanford would use groundwater for non-potable uses under the proposed 2018 General Use Permit. It is noted in the Draft EIR pages 5.9-9 and 5.16-3 that four of Stanford's wells are permitted for domestic supply, and water could be treated and pumped into the domestic water system, but only in the event of an emergency or other operational need.

A-PA-38 As discussed in the Draft EIR, Hydrology and Water Quality, pages 5.9-11 to 5.9-12, Stanford's groundwater recharge plan identifies an Unconfined Zone, which is an area of the campus where the soils and underlying geologic conditions are conducive to percolation of runoff to the underlying aquifer. The

plan indicates the campus is located in two different percolation zones, one quite permeable and thus amenable to deep percolation, and one with a clay layer that several restricts infiltrated rainfall from becoming deep percolation. The locations of these two percolation zones were delineated by the Santa Clara Valley Water District (SCVWD).

Please note that the SCVWD has made available updated GIS-based data, including on the approximate location of the boundary between groundwater recharge areas and confined areas of the subbasin, including within the Project site. Please see Response to Comment A-SCVWD-5 for additional information on this issue.

- A-PA-39 Please see Master Response 7: Flooding/Detention, generally, and in particular, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, Topic 5: Capacity of Downstream Storm Drains with Regard to Stanford’s Storm Detention Basins, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-PA-40 Please see Master Response 7: Flooding/Detention, generally, and in particular, Topic 1: Development and Approval Process for Stanford’s Existing Detention Facilities, Topic 2: Monitoring of Stanford’s Detention Capacity, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 4: Capacity of Stanford’s Detention Facilities in Storm Events Less than 100-year Event.
- A-PA-41 Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-PA-42 Please see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford’s Existing Detention Facilities, Topic 2: Monitoring of Stanford’s Detention Capacity, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, Topic 4: Capacity of Stanford’s Detention Facilities in Storm Events Less than 100-year Event, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- A-PA-44 Section 5.11, Noise and Vibration, page 5.11-8, refers to the reader to Figure 5.2-1 for an illustrative map of sensitive land uses within the Project vicinity. Please note Figure 5.2-1 has also been revised to more clearly show on- and off-site sensitive residential receptors. Please see Chapter 2 in this Response to Comments Document for the revised Figure 5.2-1.

A-PA-45 Chapter VIII of Division B-11 of the County of Santa Clara Ordinance Code (Control of Noise and Vibration) sets measures to control unnecessary, excessive and annoying noise and vibration. Section B11-157 authorizes the Director of the Department of Environmental Health to grant variances from the County Noise Ordinance. Furthermore, Section B11-157 sets forth the standards for approving such variances including the requirements that the purpose advanced by the variance and the disturbance created by the variance must not create a nuisance and will not be detrimental to the public health and safety.

In order to obtain authorization to vary from the standards of the Noise Ordinance standards, an application for a variance permit must first be made. A hearing will be held, and all property owners within 300 feet of the subject property will receive notification of the hearing date, place, and time at least five days in advance. In approving a variance, the Director may include conditions that are reasonable and necessary to protect the public health, safety and welfare from adverse effects caused by the noise and may limit the term of the variance permit. A variance cannot be permitted for a period greater than 120 days, except that a variance may be renewed under certain circumstances. If a variance to the Noise Ordinance is granted, the decision of the Director can be appealed to the County Board of Supervisors.

CEQA Guidelines section 15364 defines “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” In the case of variances to the County's Noise Ordinance, feasibility decisions will be made based on an evaluation of all of the relevant circumstances of the noise source and the details of the request.

A-PA-46 The process for public noticing of variance requests is under development, but it is anticipated that it would be similar to the current process for Stanford Architecture and Site Approval applications and consistent with other County Ordinance Code requirements. In the case of a construction noise variance request submitted for a project that would affect off-site sensitive receptors, staff of the affected jurisdiction would be provided with the opportunity to review and comment on the variance request. It is likely that this referral process would also be included in the 2018 update of the Protocol to the 1985 Stanford Land Use Policy Agreement.

A-PA-47 The Draft EIR Table 3-1 presents existing (as of Fall 2015) on-campus housing (occupied beds). Draft EIR Table 5.15-2 in the Draft EIR identifies remaining units/beds anticipated to be developed between Fall 2015 and Fall 2018.

Please see also Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing.

Stanford has met its overall housing linkage/ratio for the 2000 General Use Permit. For overall housing linkage compliance please see the 2017 Annual Report¹⁵ prepared by County planning staff that documents Stanford's compliance conformance with the housing linkage policy and related conditions of approval.

A-PA-48 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 1: Stanford's Growth Rates.

Impact 5.12-2 (page 5.12-21) discusses the potential for the proposed Project to result in a substantial adverse cumulative population and housing impact. Total population growth anticipated with the proposed 2018 General Use Permit would constitute less than 3 percent of the projected population growth of approximately 365,320 people in Santa Clara County between 2017 and 2040 (shown in Draft EIR Tables 5.12-1 and 5.12-3), which was found to be less than significant. The effects of Stanford's population growth have been analyzed in the Draft EIR using professionally-accepted methods. As it relates to the EIR analysis, the comment does not provide a reason that it is necessary to compare this anticipated growth with historic rates in the surrounding communities.

A-PA-50 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 3: Off-Campus Households and Household Adjustment Factors, and Topic 4: Use of Stanford Commute Survey.

A-PA-51 Please note Table 5.12-11 on page 5.12-18 of the Draft EIR provides the projected household increase resulting from the 2018 General Use Permit. The table also includes household growth from 2015 to 2040 for individual jurisdictions projected by ABAG. These projections are detailed in ABAG's Projections 2013 publication. The household projections in the Draft EIR were not altered from those published by ABAG. Specifically, the number of households projected in the City of Palo Alto is 27,780 in year 2015, and 34,370 in year 2040. The difference is 6,590, as shown in Table 5.12-11. The Draft EIR projects an increase of 367 households in Palo Alto resulting from the 2018 General Use Permit, or 5.6 percent of the growth projected in Palo Alto from 2015-2040, also shown in Table 5.12-11.

Also, the Recirculated Portions of Draft EIR discuss the indirect impacts of off-campus housing associated with the Project (Impact 5.17-1); see Response to Comment A-PA-52, below.

Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Job Multiplier.

¹⁵ County of Santa Clara, Stanford University General Use Permit 2000, Annual Report No. 17, June 2018.

A-PA-52 The comment is noted but does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Impacts of the Project on affordable housing in Palo Alto is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Nevertheless, the Recirculated Portions of Draft EIR discuss the indirect impacts of off-campus housing associated with the Project (Impact 5.17-1), and analyze the impacts of two new alternatives that provide additional housing.

Please also see Master Response 10: Affordable Housing, Topic 1: Affordable Housing Need.

A-PA-53 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing and Master Response 10: Affordable Housing, Topic 2: Historic Use of Stanford Affordable Housing Fund.

A-PA-54 The amount of affordable housing fees is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Nevertheless, the Recirculated Portions of the Draft EIR do discuss the indirect impacts of off-campus housing associated with the Project (Impact 5.17-1), and analyze the impacts of two new alternatives that provide additional housing.

Please see also Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund; Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.

A-PA-55 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

A-PA-56 The issue of RHNA credit is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. Please see Master Response 10: Affordable Housing, Topic 6: Regional Housing Needs Assessment Affordable Housing Credit.

A-PA-57 The Draft EIR addresses potential impacts to fire protection/emergency medical service (EMS) in several contexts. The Draft EIR Section 5.13, Public Services, Impact 5.13-1 addressed the potential for the Project to result in temporary increases in vehicle congestion, delays and potential conflicts in the construction site vicinities and/or along construction haul routes; as well as the potential for construction worker accidents and medical emergencies at the construction sites, potentially requiring associated temporary increases in responses from public fire protection, EMS and/or police protection services to these incidents.

Impact 5.13-1 explained that the type and intensity of construction activities under the proposed 2018 General Use Permit, and consequently, the nature and level of responses to Project construction-related incidences by fire protection, EMS and police protection services, would be similar to those that have occurred under the 2000 General Use Permit. Impact 5.13-1 also indicates that construction activities that would occur at construction sites under the Project would be required to be conducted in compliance with applicable regulations, including Cal/OSHA standards and practices for worker safety, minimizing the need for public fire protection and emergency service response to worker accidents at construction sites.

Impact 5.13-1 further explains that implementation of Draft EIR Mitigation Measure 5.15-1 would ensure appropriate construction traffic control measures would be implemented for individual construction projects under the proposed 2018 General Use Permit to minimize on- and off-site construction traffic effects, and further minimizing potential construction traffic incidents requiring public fire, EMS and police response.

To respond to the commenter's concerns, as modified in Chapter 2 in this Response to Comments Document, Impact 5.13-1 adds that 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) and for communication and emergency dispatch services from the PAPD.

Given these factors, Impact 5.13-1 concludes that the proposed 2018 General Use Permit would not generate a significant additional demand for public fire protection, EMS, or police protection services that would require new or physically altered facilities, and the impact would be less than significant.

Impact 5.13-2 analyzed the demand for fire protection and emergency medical services during Project operation. As discussed in that impact analysis, development under the Project is expected to occur within existing urbanized areas of the campus, and consequently, would be served by the existing on-campus Fire Station 6. The Draft EIR also pointed out that the relocation of Stanford DPS operations to the planned Public Safety Building and Departmental Operations Center in Stanford's Bonair Corporation Yard will serve to provide additional operational space for PAFD or another provider at Fire Station 6 to use, if needed. The Draft EIR further indicates that while no specific need for new or physically altered public fire protection/EMS facilities is identified for the Project, the proposed 2018 General Use Permit would allow for authorization of expanded or new academic support development, which could include additional on-campus fire protection/EMS facilities, if needed to serve the campus population in the future.

Impact 5.13-2 also discussed that new development under the proposed 2018 General Use Permit would be subject to fire and life safety code compliance, as reviewed by the Stanford University Fire Marshal's Office (SUFMO).

Impact 5.13-2 concludes that given all the above factors, increases in development and population on the Project site would increase demand for fire protection and EMS, but, the Project would not result in an adverse physical impact on the environment from the construction of additional fire protection or emergency medical service facilities, and the impact would be less than significant.

In addition, Draft EIR Impact 5.13-5 addressed the cumulative impact on fire protection and EMS. Based on consultation with the PAFD, it indicated that with planned improvements to PAFD fire station facilities in its City, that the PAFD can adequately serve the increased demand from increased growth and buildout of the City. Annual City reviews and monitoring of fire department services and performance metrics (including response times) that is conducted by the City would help to ensure that the PAFD would continue to adequately meet the demands of the city and accommodate growth not only by the Project but from throughout the city. On this basis, the cumulative impact under the 2018 General Use Permit was also determined to be less than significant.

Regarding the response times issue, please see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

With respect to the treatment of wildland fire, see Draft EIR Section 5.8, Hazards and Hazardous Materials, Impact 5.8-9 (pages 5.8-30 to 5.8-31) and Impact 5.8-11 (pages 5.8-32 to 5.8-33), which adequately addressed this issue in detail.

Based on the above analysis, the Draft EIR's conclusions regarding impacts to fire protection and EMS are supported by substantial evidence, and the comment provides no contrary evidence that such impacts would be significant.

A-PA-58 Please see Chapter 2 in this Response to Comments Document, which addresses revisions to Section 3.14, Public Services Impact 5.12-2, to recognize that Stanford may contract with other qualified fire protection/EMS service providers if it does not maintain its contract with the Palo Alto Fire Department.

See also Response to Comment A-PA-10 and Response to Comment A-PA-57, above. The status of Stanford's fire protection services contract is a contractual, not environmental, matter and therefore does not trigger the development and consideration of project alternatives under CEQA.

A-PA-59 In response to Comments A-PA-10 and A-PA-58, certain edits have instead been made to Draft EIR Section 5.13, Impact 5.13-1, page 5.13-13; Impact 5.13-2, page 5.13-14; and Impact 5.13-5, page 5.13-18. Please see Chapter 2 in this

Response to Comments Document for edits made. The revisions made do not alter the impact analysis or conclusions of the Draft EIR.

A-PA-60

The Draft EIR addresses potential impacts to public police protection services in several contexts. As described in Response to Comment A-PA-57, above, Draft EIR Impact 5.13-1 concluded that Project construction related to the 2018 General Use Permit would not generate a significant additional demand for public police protection services that would require new or physically altered facilities; therefore, the impact would be less than significant.

Draft EIR Impact 5.13-3 analyzed the demand for police protection services during Project operation. Impact 5.13-3 describes that police protection for the Project site is provided by the Stanford Department of Public Safety (DPS) for law enforcement, crime prevention, emergency response, and traffic and parking control; with investigative support from the Santa Clara County Sheriff's Department; and that Stanford contracts with the PAPD for emergency dispatching services.

Impact 5.13-3 explains that during the proposed 2018 General Use Permit, Stanford would pay the City of Palo Alto a fair share contribution annually as compensation for the communication and emergency dispatch services it would receive from the PAPD. Impact 5.13-3 also indicates that the City of Palo Alto is also planning a new Public Services Building (PSB) that would house the PAPD, as well as its emergency dispatch center and other services, and will accommodate existing and future police and emergency planning facility needs of the City.

Given these factors, Impact 5.13-3 concludes that Project operation would increase demand for police protection services, but the Project would not result in an adverse physical impact on the environment from the construction of additional police protection facilities, and the impact would be less than significant.

In addition, Draft EIR Impact 5.13-6 addresses the cumulative impact on police protection services. Impact 5.13-6 also acknowledges the planned PSB to accommodate PAPD and its emergency dispatch center services for existing and future police and emergency planning facility needs of the City. Impact 5.13-6 also notes that annual City reviews and monitoring of law enforcement services and performance metrics (including dispatch response times) that is conducted by the City of Palo Alto would help to ensure that the PAPD would continue to adequately meet the demands of the city and are able to accommodate growth not only by the Project but from throughout the city. On this basis, the cumulative impact to police protection services under the 2018 General Use Permit was also determined to be less than significant.

A-PA-61 The student generation rates used in the Draft EIR, based on students per proposed multi-family units, were consistent with the “moderate” student generation rates used by PAUSD’s demographer, DecisionInsite, in its Fall 2016 Residential Research Summary Report. This yield rate was also used in the Palo Alto Comprehensive Plan Update Final EIR. As explained in Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts, this rate is in fact higher than the actual existing student generation rate of existing Stanford faculty/staff housing, and is therefore conservative.

The Project does not include new family housing units for undergraduate or graduate students; no increase in school children are expected to result from the proposed student housing.

Effects of indirect growth, including public school demand, were addressed in the Draft EIR Section 6, Other CEQA Issues, which indicated that indirect growth would cause increased demand for public services, including public schools. The Recirculated Portions of Draft EIR Impact 5.17-1 also acknowledged effects of indirect growth, including in the City of Palo Alto, and concluded the indirect growth effects would be significant and unavoidable.

Please also see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts, and Topic 2: Additional School Site.

A-PA-62 With respect to the methodology used to identify the parks and recreational facilities, the Draft EIR describes this on pages 5.14-2 through 5.14-9. In summary, the parks presented in the analysis were based on assessment of the potential for increased visits by campus residents from the proposed Project to result in significant deterioration of the park and recreational facilities. Figure 5.14-2, Table 5.14-2, and Table 5.14-4 of the Draft EIR (on p. 5.14-6, 5.14-7, 5.14-22), show the parks in Palo Alto and Menlo Park for which the growth in daily visits and daily visits per acre are presented, to estimate the increase in usage by on-campus residents under the 2018 General Use Permit. While not specifically limited to three miles, parks with visits by the Stanford population are most frequent within this range. Page 5.14-7 of the Draft EIR lists regional parks within three miles of the Project site boundary as a list of examples, but does not list three miles as a criterion for selecting the parks to analyze.

With respect to the inclusion of additional park and recreation facilities, Draft EIR Appendix REC further explains that the survey used to identify parks visited by Stanford campus residents asked respondents whether they visited off-campus public park and recreation facilities in nearby communities, specifically those in Palo Alto and Menlo Park. The survey included a menu of parks and facilities in Palo Alto and Menlo Park for selection, and respondents had the ability to identify three additional facilities that they visited, beyond the ones listed. All of parks that the City of Palo Alto identified in the city’s comment were mentioned

in survey responses. However, as explained in Draft EIR Appendix REC, the focus of analysis was those nearby public park and recreation facilities that at least five Stanford campus residents said they visit once per month or more. Parks not identified on Figure 5.14-2 were not visited by at least five campus residents at least once per month, and therefore, are not likely to experience a substantial increase in visits by campus residents.

The comment also requests information about the lease term for El Camino Park and Mayfield Fields. With respect to leased parks, El Camino Park is on Stanford property. Stanford leased the El Camino Park land to the City of Palo Alto in 1915 and to this day continues to lease the land to Palo Alto. The lease currently expires June 30, 2042. The Mayfield Playing Field is addressed by the Mayfield Development Agreement between Stanford University and the City of Palo Alto, and is leased to the City of Palo Alto at \$1 per year for 51 years from the date of the agreement as a public soccer complex. The park lease expires on August 8, 2057.

A-PA-63 Draft EIR Appendix REC explains that the survey used to identify parks visited by campus residents asked respondents whether they visited off-campus public park and recreation facilities in nearby communities, specifically those in Palo Alto and Menlo Park. The survey included a list of parks and facilities in Palo Alto and Menlo Park for selection, and respondents had the ability to identify three additional facilities that they visited, beyond the ones listed. Survey respondents identified the “Bol Park path.” However, fewer than five campus residents reported that they visit this location once per month or more. The number of visits to the Bol Park path noted from survey responses was determined to be too infrequent and too low to be included in the analysis.

Although the visits to the Bol Park path were deemed too infrequent and too low to be included in the analysis, a set of proposed improvements to the Bol Park path connection for bicycle travel is outlined in Chapter 8 of the Draft EIR, Special Considerations; see page 8-4.

A-PA-64 As explained in the Draft EIR Project Description, the Escondido Village Graduate Residences project was previously approved under the 2000 General Use Permit and is currently under construction. That building project is not part of the proposed 2018 General Use Permit.

As it relates to the proposed Project, the Draft EIR determined the proposed 2018 General Use Permit would have no potential impact on public libraries (page 5.13-12). As a major higher education institution Stanford provides extensive on-campus library facilities and related services to accommodate the library demands of its student, faculty, and staff, and would expand those facilities as needed with development of new academic facilities under the proposed 2018 General Use Permit. Consequently, it is highly unlikely that the increased student and faculty

population to be accommodated under the proposed 2018 General Use Permit would necessitate the need for new off-campus public libraries.

Furthermore, use of public facilities alone, even if such use results in crowding, is not an environmental impact under CEQA. On page 5.14-17, the Draft EIR states: “Crowding and increased demand for public facilities and programs alone, absent physical deterioration or new construction or the alteration or displacement of existing parks or recreation facilities on campus, are not considered physical environmental impacts under CEQA.”

A-PA-65 With respect to the Project’s impact on public libraries, please see Response to Comment A-PA-64, above.

The Draft EIR addressed recreation impacts in a two-part process. First, the Draft EIR addressed the question whether additional land is needed for parks to serve the population growth associated with the proposed Project. Then the Draft EIR addressed the question whether increased use of off-campus parks would result in substantial physical deterioration of park and recreation facilities.

On page 5.14-17, the Draft EIR explained that, to address the need for construction or expansion of new park facilities, it is common for jurisdictions to use an “acres of park per 1,000 residents” target to determine whether a residential project would necessitate construction of new onsite parks to serve additional residents, which in turn, could result in physical environmental effects. With respect to the anticipated increase in Stanford-generated residents, this EIR both considers whether the increase in on-campus residential population anticipated to occur under the 2018 General Use Permit would result in a need for new parks or recreation facilities and whether the increase in campus residential population would result in substantial physical deterioration of neighboring off-campus park and recreation facilities.

On page 5.14-20, the Draft EIR concludes that, under the proposed Project, Stanford would continue to provide at least five acres of designated Campus Open Space per 1,000 campus residents. Therefore, the proposed Project would not generate a need to provide additional parkland, and mitigation in the form of a requirement to provide acreage of park use is not warranted by the EIR’s conclusions. On page 5.14-21, the Draft EIR also concludes the proposed Project would not result in substantial increased or accelerated deterioration of off-campus parks. Therefore, mitigation in the form of funding for park maintenance is not warranted by the EIR’s conclusions. Nevertheless, as an Improvement Measure, Stanford voluntarily offers park upgrade funds specific to the four College Terrace parks.

A-PA-66 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for evidence of the effectiveness of the no net new commute trips program, including the ability to expand the program to reduce

more vehicle trips; as well as discussions of trip credits, average daily traffic, and peak-hour spreading. Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of reverse-commute intersection impacts and mitigation. Please also see Responses to Comments A-PA-86 through A-PA-125 for specific responses to Hexagon comments not otherwise responded to below.

- A-PA-67 Please see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading.
- A-PA-68 Assumptions about future transit capacity presented in the Draft EIR are based on the best available information from transit providers. It is not reasonable to expect that major transit infrastructure projects planned for years in the future would be fully funded today. The analysis relies upon the 2014 Caltrain Capital Improvements Program (CIP) to support the assumption that Caltrain would expand its platforms to accommodate eight-car trains.¹⁶ As noted in Draft EIR on page 5.15-155, the Transit and Bicycle Capacity Analysis is not a required component of a CEQA analysis, but was presented for informational purposes.
- A-PA-69 Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of the on-campus parking supply and its evaluation in the Draft EIR.
- A-PA-70 The possible Caltrain grade separation at Alma Street/ Charleston Road (Intersection #58) is not an approved or pending project; therefore, it is not assumed to be in place under No Project or With Project conditions in the 2018 Baseline and 2035 Cumulative traffic scenarios. If this or other grade separations are proposed for approval, the CEQA document for the grade separation projects would address impacts of the grade separations.
- Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for additional information on intersection impacts.
- A-PA-71 Figure 5.15-21 in the Draft EIR shows where nearby jurisdictions have established residential permit programs (RPPs) in neighborhoods near Stanford, and that very little unrestricted parking exists near the campus. The Draft EIR also shows that there are no areas with unrestricted parking within a 5-minute walk from Marguerite shuttles that serve the campus with a frequency of 15 minutes or less during peak commute periods. On page 5.15-176, the Draft EIR explains: “The RPPs are expected to prevent parking in these neighborhoods; anecdotal observations to the contrary may pre-date initiation of the RPPs.” The Draft EIR further explains: “Substantial amounts of Stanford-affiliate parking in

¹⁶ It should be noted, that the Palo Alto Station, which serves the campus, does not need a platform extension to accommodate the eight-car trains. <http://www.caltrain.com/Assets/Caltrain+Modernization+Program/Presentations/Caltrain+Longer+Platform+and+Trains.pdf>.

neighborhoods near shuttle routes with less frequent commute period shuttle service also is unlikely to occur.” As illustrated in Figure 5.15-22 of the Draft EIR, Marguerite shuttle service is not designed to encourage off-campus parking. It is focused on first-last mile connections to the Palo Alto Transit Center.

Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for additional discussion of off-street parking near Stanford.

A-PA-72 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for an explanation of the Community Plan’s flexible approach, rather than an approach that would require specifying individual TDM measures to achieve that standard. The current TDM program is described starting on page 8 of Appendix TIA (Part 1) of the Draft EIR. Policy SCP-C 5 of the Stanford Community Plan allows Stanford flexibility to develop its lands within a framework that minimizes potential negative effects. This framework gives Stanford the flexibility to change the TDM program to meet the no net new commute trips standard as the campus population changes and technology advances. The process and some of the technologies that Stanford proposes to use to meet the no net new commute trips standard are outlined in the Stanford Transportation Strategy.¹⁷ See also Response to Comment A-PA-9.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for additional detail on the no net new commute trips policy.

A-PA-73 The Marguerite shuttles that serve off-campus locations are optimized to provide the most direct and efficient routes to make them competitive with the same trip by a single-occupancy car. Rerouting Marguerite shuttles would reduce their effectiveness in moving drivers out of their cars.

A-PA-74 Diversion of trips onto Hamilton Avenue is an existing condition. Further, Project-related trips would not have been assigned to Hamilton Avenue if there were no existing cut-through traffic in this location. Therefore, it would not be correct to use an adjusted base volume on Hamilton Avenue without the existing cut-through traffic. The TIRE index analysis is based on a comparison between the existing level of traffic to the future traffic volume on a given roadway.

Because Hamilton Avenue already experiences a large amount of diverted traffic, the additional diverted traffic resulting from the proposed 2018 General Use Permit development would be insufficient to cause a significant impact under the TIRE methodology. In fact, even if the estimate of 121 project-generated trips on the Hamilton Avenue were doubled or tripled, the impact would be considered to

¹⁷ See <https://drive.google.com/file/d/1RKH5iIbUXSkCdA9rV0q8EntlMow7EmS0/view>.

be less than significant because the traffic increase still would be well below the threshold of 1,025 trips. The Draft EIR applies the TIRE methodology correctly.

Please see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for additional detail on the methodology and impact evaluation for neighborhood streets.

A-PA-75 As outlined in the annual traffic monitoring reports, and restated in Mitigation Measure 5.15-2, the annual monitoring is conducted by AECOM, a third-party consultant hired by, and acting at the direction of, the County. Stanford pays for the cost of the monitoring, but does not conduct the monitoring. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

The comment asserts that “traffic congestion is noticeably less when Stanford is not in session” and states this means the no net new commute trips program is not working. This assertion is incorrect. Please see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading. In July 2016, Stanford analyzed two weeks of cordon data to understand how traffic patterns at the campus gateway fluctuate during the year as show in Figure MR13-4. The Average Daily Trips (ADT) for the two-week period was approximately 77,500 vehicles per day (vpd), which is similar to the 77,600 vpd observed in the 2016 academic year and slightly higher than the 2015 ADT (75,700 vpd) for the academic year. In addition, Figure MR13-4 also demonstrates that the times of day when Stanford campus trips peak is the same in the summer during the rest of the year. The data do not indicate that traffic to and from the Stanford campus fluctuates based on when Stanford is in session.

A-PA-76 The methodology for measuring no net new commute trips accounts for all vehicles entering and exiting the campus during the peak hour. While the word “commute” appears in the short-hand name of the program, the vehicle trips counted at the cordons are not limited to trips by commuters. Vehicle trips counted at the cordon also include trips by campus residents, campus visitors, contractors, and any other individual who enters or exits the campus.

Cut-through trips are eliminated from the counts to recognize Stanford should not be held responsible for trips by people who are not traveling to or from a campus destination.

The area in which the County may credit off-campus trip reductions is defined by the locations where a significant intersection impact would occur if Stanford does not achieve the no net new commute trips standard (local impact area). The local impact area identified in the EIR for the 2000 General Use Permit was used to

define the area in which Stanford can receive credits for reducing off-campus trips under the 2000 General Use Permit. Draft EIR Mitigation Measure 5.15-2 depicts a new local impact area to reflect the Draft EIR's conclusions about the locations where a significant intersection impact would occur if the no net new commute trips standard is not met during implementation of the 2018 General Use Permit. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis conducted to address the impact of reverse-commute trips, Topic 6: No Net New Commute Trips Standard for additional detail on the no net new commute trips policy, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for information about peak hour spreading and monitoring periods.

A-PA-77 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for information on how mitigation measures were developed to address traffic generated by the 2018 General Use Permit and Topic 6: No Net New Commute Trips Standard.

As described in the Draft EIR, the analyses for air quality, energy, greenhouse gas emissions and noise, like the transportation analysis, use the worst-case scenario that Stanford does not meet the no net new commute trips standard. See page 5.15-157 of the Draft EIR.

A-PA-78 The proposed Project does not include infrastructure changes that would preclude implementation of planned bicycle or pedestrian facilities, including those associated with Safe Routes to School (SRTS) programs. Further, as described on page 5.15-112 of the Draft EIR, the Project would construct improvements on Stanford lands in unincorporated Santa Clara County that have been identified by the Palo Alto Unified School District and the City of Palo Alto as the Suggested Routes to Schools shown on the Walkabout Maps for Nixon and Escondido Elementary Schools. These improvements would benefit both pedestrian and bicycle circulation in the immediate area of both schools. Circulation improvements on Stanford lands in unincorporated Santa Clara County, in and around Nixon Elementary School, could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, and wayfinding signs. Circulation improvements in and around Escondido Elementary School similarly could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, additional traffic control. Specific improvements on Stanford property

could include an enhanced mid-block crosswalk on Escondido Road. As stated on page 3-24 of the Draft EIR, Stanford plans to construct the SRTS improvements on Stanford lands. This means Stanford would fully fund the cost of constructing the improvements. The proposed Project does not include program funding for SRTS, and a funding budget is therefore unnecessary.

A-PA-79 As outlined in Chapter 3, Project Description, under the 2018 General Use Permit, Stanford plans to construct several bicycle and pedestrian supportive projects on the Project site that are designed to serve local area student trips to the Nixon and Escondido Elementary Schools. Stanford proposes to construct the improvements on the Project site that have been identified by the PAUSD and the City of Palo Alto as Suggested Routes to Schools. Circulation improvements on Stanford lands in and around Nixon and Escondido Elementary Schools could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, and wayfinding signs and additional traffic control. The proposed Project does not include construction of a new public school.

A-PA-80 to A-PA-82

The Tier 1 improvements identified in the 2000 General Use Permit EIR were located at the edge of the campus, at Arboretum Road and Palm Drive and at Welch Road and Campus Drive West. Stanford was willing to construct them as part of the project regardless of whether it achieved the no net new commute trips standard. The 2000 General Use Permit EIR only required contribution to off-site intersection improvements in the event that Stanford did not achieve the no net new commute trips standard.

Pursuant to CEQA Guidelines 15127.4 (4)(B), mitigation measures must be “roughly proportional” to the impacts of the project. The impacts in the Draft EIR for the proposed 2018 General Use Permit were identified based upon the reasonable worst-case assumption that Stanford does not achieve the no net new commute standard during implementation of the 2018 General Use Permit. Mitigation Measure 5.15-2 specifies a performance standard to measure whether Stanford is in fact meeting the standard. If Stanford does not add trips to local roadways, or offsets its own trips by reducing trips by others, it does not contribute to the significant impact identified in the Draft EIR. In that case, Stanford would not be required to contribute to transportation improvement such as grade separation and transit center improvements.

Pursuant to the policies of the Stanford Community Plan, the County prefers that Stanford employ trip reduction measures that prevent significant impacts from occurring, rather than improvements to expand the capacity of individual intersections. However, if Stanford does not achieve the no net new commute trips standard, Mitigation Measure 5.15-2 requires the County to collect fair share impact fees from Stanford. Mitigation Measure 5.15-2 has been revised to

clarify that the County would spend the fair share impact fees on the intersection improvements identified in Table 1 of Mitigation Measure 5.15-2(a), unless it is not feasible to use the fees for such improvements. The improvements suggested by the commenter are the types of substitute improvements upon which the County can elect to expend any fees that it collects if it is not feasible to use the fees for intersection improvements identified in Table 1 of Mitigation Measure 5.15-2(a). It should be noted that Mitigation Measure 5.15-2 also has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

- A-PA-83 Please see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for a discussion of the proposed Project's bicycle infrastructure improvements and funding.
- A-PA-84 Please see Master Response 8: EIR Alternatives, Topic 2 Additional Detail on Potential Alternatives; and Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing.
- A-PA-85 Please see Chapter 2 in this Response to Comments Document, for the following revisions:
- List of Abbreviations and Acronyms, and Section 5.8, Hazards and Hazardous Materials, references to the Office of Emergency Management (OEM) is changed to Office of Emergency Services (OES);
 - Section 5.15, Transportation and Traffic, Mitigation Measure 5.15-1 (Protection and Maintenance of Emergency Service Access and Routes) is revised to also include informing the Palo Alto Police Department; and
 - Section 5.13, Public Services, revisions are made for the Palo Alto Fire Stations 1 and 2 staffing and/or equipment; response time for emergencies; and the use of crossing guards on commute routes.
- The comment also notes the availability of the Palo Alto Emergency Operations Plan and City of Palo Alto Threat and Hazard Identification and Risk Assessment (THIRA). The existence of these additional plans identified by the comment is acknowledged. However, the Draft EIR is not intended to exhaustively identify every plan from every jurisdiction, but rather, adequately describe relevant emergency services and regulations applicable to the Project and the Project site. These documents are not cited in the Section 5.8 of the Draft EIR, and therefore, do not need to be included in the references for the Draft EIR.
- A-PA-86 With respect to peak periods, see Response to Comment A-PA-87; with respect to direction of travel, see Response to Comment A-PA-88; and with respect to use of trip credits, see Response to Comment A-PA-89, below.

- A-PA-87 Please see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.
- A-PA-88 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, Topic 6: No Net New Commute Trips Standard, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for a supplemental analysis conducted to address the impact of reverse-commute trips, additional discussion of the no net new commute trips standard, and discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.
- A-PA-89 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for detail on how trip credits are applied in the context of the no net new commute trips policy.
- A-PA-90 The County Planning Office will take this comment into account when considering how to prioritize use of the fees. Mitigation Measure 5.15-2(a) has been revised to clarify that the fees will be expended to fund the intersection improvements listed in Table 1 of this mitigation measure if it is feasible to do so. If it is not feasible to use the fees for the specified intersection improvements, the County will use the fees for other trip reduction programs in the local impact area to encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area. If other trip reduction programs are funded, the City of Palo Alto’s observation may weigh in favor of funding one-time capital improvements to infrastructure designed to reduce trips rather than ongoing programs. If, on the other hand, the County of Santa Clara observes that the no net new commute trips standard is being exceeded by a similar amount on a regular basis, the County could prioritize funding for an ongoing trip reduction program.
- Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- A-PA-91 The process for measuring the cordon traffic was developed in a coordinated process with the County of Santa Clara in 2001. The process is rigorous in nature (eight weeks of counts at all campus gateways, with methodical screening of pass-through trips, and calibration to account for medical center travel). The comment provides no evidence that the cordon counts are inaccurate. The trip generation rates used in the Draft EIR were prepared by traffic engineers at Fehr & Peers, and peer reviewed by traffic engineers at AECOM and ESA, who confirmed that the trip generation rates were appropriate for use in the Draft EIR.
- A-PA-92 The commenter is referred to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of

average daily traffic and peak hour spreading in the context of the no net new commute trips policy.

A-PA-93 With regard to the College Terrace neighborhood, the current daytime two-hour time limit for non-resident vehicles effectively prevents substantial parking on neighborhood streets by campus commuters. In the Evergreen Park-Mayfield and Southgate neighborhoods, no data or studies have been provided suggesting that University commuters are parking in these areas and walking or bicycling to campus. Pedestrian and bicyclist counts conducted as part of the fall 2016 baseline data collection at intersections along El Camino Real at Churchill Avenue, Serra Street and Stanford Avenue indicate low volumes of pedestrians crossing El Camino Real during the peak hours, which support the assumption that “hidden vehicle trips” are not happening in substantial numbers.

A-PA-94 Parking along El Camino Real occurred prior to the 2000 General Use Permit and the number of spaces has not changed throughout the lifetime of the 2000 General Use Permit monitoring; therefore, no change in the number of vehicle trips traveling to and from this parking location is likely to have occurred during implementation of the 2000 General Use Permit, nor would a change be likely to occur under the proposed 2018 General Use Permit. The proposed Project would not add more parking in this location, and therefore would not increase vehicle trips to and from parking at this location.

The public parking along El Camino Real is within the Caltrans right-of-way and is outside the control of Stanford University or the County of Santa Clara. The area is not included in the cordon count because (a) it was not included in the baseline count; (b) the number of spaces in this area is not expected to change, the volume of trips to and from the area is not expected to change as a result of the proposed Project; and (c) the parking area can be occupied by anyone, and is not within Stanford’s or the County’s control.

A-PA-95 Data collected during annual monitoring show that trips passing through the Stanford campus have not been increasing as a percentage of total trips. As reported in the Annual Traffic Monitoring reports prepared by AECOM for the County, the percentage of pass-through traffic varies from year to year, and has stayed roughly between 10-15 percent of total peak hour traffic. Drop-off would have been occurring in 2001 when the baseline was set and there is no evidence in the traffic monitoring data that the number of cut-throughs, or drop-offs, has increased.

A-PA-96 The Vehicle Miles Traveled analysis presented in the Draft EIR, commencing on page 5.15-143, shows that the Stanford campus is operating in a manner that results in substantially lower vehicle miles traveled on a per capita basis compared to regional averages. Increased campus density within the Academic Growth Boundary, as proposed for the 2018 General Use Permit, will further

enable Stanford to continue to support an effective and efficient transit system. The locations where development under the 2018 General Use Permit may occur, by development district, are summarized in Table 3-6 of the Draft EIR and illustrated in Figure 3-8. Figures 5.15-5 and 5.15-22 illustrate the Marguerite shuttle routes which service the development districts where growth is proposed under the 2018 General Use Permit.

A-PA-97 The comment does not explain why a capacity assessment of the Palo Alto Intermodal Transit Center (PAITC) would be necessary to analyze the environmental impacts of the proposed Project. The role of the EIR for the proposed 2018 General Use Permit is to analyze physical effects of the proposed project pursuant to those significance criteria presented in the Draft EIR (including those in Section 5.15.5 in the Draft EIR Transportation and Traffic).

Please also see Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for a discussion of how transit ridership is evaluated under CEQA and by the County of Santa Clara.

A-PA-98 Assumptions about future transit capacity presented in the Draft EIR are based on the best available information. It is not reasonable to expect that major transit infrastructure projects planned for years in the future would be fully funded today. The analysis relies upon the 2014 Caltrain Capital Improvements Program (CIP) to support the assumption that Caltrain would expand its platforms to accommodate eight-car trains. As noted on page 5.15-155 of the Draft EIR, the Transit and Bicycle Capacity Analysis is not a required component of a CEQA analysis, but was presented for informational purposes.

A-PA-99 The comment is noted. However, transit crowding alone is not considered to be an environmental impact under CEQA, and the County has chosen to rely on guidance by OPR that increased transit ridership is not an adverse physical impact. Please also see Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for a discussion of how transit ridership is evaluated under CEQA and by the County of Santa Clara.

A-PA-100 As explained on page 5.15-155 of the Draft EIR, the mode share analysis used to assess the capacity of Caltrain to handle increased Stanford ridership was based on a worst-case conservative approach and shifted the full number of drive alone commuters needed to achieve the no net new commute trips standard to the rail mode. As such, rail mode share is assumed in the transit capacity analysis to increase from 23.1 percent in 2015 and 2018 to 29.9 percent in 2035. This is a conservative, worst-case approach because it is unlikely that all necessary drive-alone trips would be shifted to rail. Stanford may choose to provide additional bus service, either by funding increased service provided by public transit providers or by running its own buses. Similarly, bicycle mode share may increase under an Expanded TDM scenario due to Stanford's funding of

additional bicycle infrastructure in nearby communities. There are many tools available for Stanford to move drivers from single-occupancy vehicles to other modes of transportation.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for additional information on the no net new trips policy.

- A-PA-101 Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of the on-campus parking supply and its evaluation in the Draft EIR.
- A-PA-102 Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of the on-campus parking supply and its evaluation in the Draft EIR.
- A-PA-103 The Draft EIR presents significance thresholds for signalized intersections on pages 5.15-54 and 5.15-55, and presents significance thresholds for unsignalized intersections on page 5.15-57. As noted on page 5.15-57 of the Draft EIR, the City of Palo Alto's Comprehensive Plan states that non-CMP signalized intersections adhere to an LOS D threshold. However, the Comprehensive Plan does not state a significance threshold for unsignalized intersections. Because the LOS D threshold is not an officially adopted City of Palo Alto criterion and this project is within the County's jurisdiction, a uniform LOS E threshold was used at all unsignalized intersections throughout the study area for purposes of this analysis.
- A-PA-104 The Draft EIR mitigation analysis finds that a traffic signal would mitigate the Project impact. While an alternative roundabout design for the intersection has been studied, the roundabout plan has not been adopted, and, as noted in the comment, the near-term timing is uncertain. Therefore, the Draft EIR recommends that Stanford contribute a fair-share toward the installation of a traffic signal since this improvement has been demonstrated to mitigate the Project impact under 2018 Baseline conditions. If a roundabout is selected as the design for this intersection and if Stanford does not achieve the no net new commute trips standard, the County could apply funding collected from Stanford to the cost of the roundabout rather than to the cost of the traffic signal.
- Regarding the 2035 traffic control assumption for this intersection, the analysis assumes that by 2035, traffic control improvements would be implemented at this intersection because such improvements are included as a Tier 1 fully funded measure in the VTA 2040 model. The least costly improvement that would mitigate the impact, a new traffic signal, was assumed for purposes of analysis.
- The traffic control and lane configuration assumption for intersection No. 13 under 2035 Cumulative No Project and 2035 Cumulative with Project cases has

been corrected. Please see revised TIA in Appendix TIA-REV in this Final EIR for the corrected text.

A-PA-105 Please see Response to Comment A-PA-103, above, regarding the LOS standard applied in the analysis.

All intersection LOS tables and text references regarding intersection #14 lane configuration, traffic control and signal phasing is updated where needed to ensure consistency in the Final EIR. Please see revised TIA in Appendix TIA-REV for updated the corrected text.

A-PA-106 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for further detail on the modeling effort and mitigation measure for this intersection.

A-PA-107 Please see Response to Comment A-PA-103, above, regarding the LOS standard applied to unsignalized intersections in this analysis.

A-PA-108 Curbside bus queue jump lanes are included in Policy T-1.12 and T-8.1 in the City of Palo Alto Comprehensive Plan (adopted November 2017). Comprehensive Plan Program T1.12.3 calls for the City to “advocate for bus service improvements on El Camino Real such as queue jump lanes and curbside platforms.” A queue jump lane project has not yet undergone design nor environmental review. Therefore, it is not possible to determine whether adequate right-of-way exists for both an additional northbound left turn lane and the queue jump lanes. Additional right-of-way may be needed to accommodate the queue jump lanes with or without the proposed left-turn lane mitigation measure.

Please also see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting, and Topic 2: Approach for Cumulative Scenario.

A-PA-109 Palo Alto’s new Comprehensive Plan, adopted in November 2017, includes policies to pursue grade separations along the Caltrain corridor and to undertake studies, outreach, and advocacy for state, regional and federal funding for them. No feasibility analysis, design, funding or environmental analysis for grade separations is included in the Comprehensive Plan or its Environmental Impact Report. Palo Alto is now beginning that effort, but does not expect to identify a preferred alternative until the end of 2018, to be followed by CEQA analysis of that alternative in 2019. (See Palo Alto City Council Staff Report ID #9100).

As noted on page 5.15-94 of the Draft EIR, the proposed Project’s impact under 2018 Baseline with Project conditions would be reduced to a less-than-significant level with the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements at the signalized intersection of Alma Street / Charleston Road. To accommodate

the construction of a designated northbound right-turn lane, the northbound Alma Street approach would need to be widened and likely would require the acquisition of additional right-of-way. Installation of an overlap phase for northbound and southbound right-turning vehicles would be accommodated through the modification of the existing traffic signal. On page 5.15-132, the Draft EIR explains that under 2035 Cumulative conditions, this same mitigation measure would improve the level of service at this intersection, and reduce the Project's contribution to a significant cumulative impact, but not to a less-than-significant level. Due to the absence of an approved program for grade separations at Alma Street and Charleston Road, no further mitigation is feasible.

Please also see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting, and Topic 2: Approach for Cumulative Scenario.

A-PA-110 According to VTA's TIA Guidelines (page 44), an impact would occur on a freeway segment if the level of service deteriorates from LOS E or better to LOS F. If the segment is already operating at LOS F, then an impact would occur if the project's added trips constitute more than 1 percent of the freeway capacity.

The comment refers to the VTA TIA Guidelines methodology for assessment of Existing Plus Project impacts, which is based on existing vehicle densities based on aerial observations, and corresponding LOS, and the effect of adding project trips to the existing volume. The 2018 General Use Permit Draft EIR does not evaluate Existing Plus Project conditions (2016) because the Project will not begin implementation until fall 2018 at the earliest. Therefore, the Background (2018) condition is identified as the baseline against which to measure project impacts. The Draft EIR evaluates two future conditions – Background (2018) conditions and Cumulative (2035) conditions.

For the future conditions analyses, the VTA TIA Guidelines do not specify the use of the vehicle density methodology, and the use of the volume-to-capacity methodology is commonly used for CEQA evaluations of land use development projects within Santa Clara County. The VTA TIA Guidelines require analysis only for the Existing Plus Project case, and specify the density-based methodology because the existing freeway operations are defined by aerial surveys that measure vehicle density and, via calculation, average travel speeds. Thus, a project traffic impact can be evaluated against that existing conditions metric for an Existing Plus Project analysis.

In contrast, future forecasts of vehicle density and speed cannot be provided with the available analysis tool, the VTA Travel Demand Model. Therefore, density-based analyses for the Background (2018) No Project and With Project and Cumulative (2035) No Project and With Project density-cases are not possible. In addition, many of the freeway segments in the Draft EIR study area are projected

to operate at or above LOS F (i.e., with traffic demands that are at or over-capacity). In these conditions, freeway densities are as high as theoretically possible.

For both of these reasons, the Draft EIR provides a volume-to-capacity ratio comparison for the Background (2018) No Project and With Project cases, and for the Cumulative (2035) No Project and With Project cases, which assesses the proposed Project's effect on the volume on each segment. The Draft EIR then applies the same threshold of significance as defined in the VTA TIA Guidelines, which is: does the project add trips that are more than one percent of the freeway capacity? This approach is commonly used in impact analyses throughout the County, when future cumulative freeway analyses are provided.

The comment suggests that the County could obtain a voluntary payment toward regional freeway facilities through a development agreement. Even if a voluntary payment were mutually agreeable to Stanford and the County, the impact would remain significant and unavoidable due to the absence of such a regional fee program.

Please also see Master Response 6: Approach to 2018 Baseline Environmental Setting, and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting, and Topic 2: Approach for Cumulative Scenario.

- A-PA-111 At this location, the Draft EIR does not assume the freeway mainline lane feeding the ramps is part of the ramp storage. The Draft EIR states that the 95th percentile left turn queue can be contained within the total 1,940-foot off-ramp, and not spill back to the freeway mainline, for all cases. It is acknowledged that maximum queues can sometimes extend back into the exclusive freeway lane feeding the ramp. However, this lane is not used by freeway mainline traffic, so it is reasonable to assume it is available to serve these maximum queues. Regarding the assumption of an all-way stop at this intersection for purposes of the 2035 freeway off-ramp analysis, the I-280/Page Mill Road southbound off-ramp analysis in TIA Part 2 and the Final EIR has been corrected to be consistent with the signalized operation assumed for the 2035 Cumulative conditions scenario. Please see revised TIA in Appendix TIA-REV for the corrected text.
- A-PA-112 Mitigation Measure 5.15-1, discussed on pages 5.15-72 and 5.15-73 of the Draft EIR, and as further refined in Chapter 2 in this Response to Comments Document in response to Comment A-PA-85, requires Stanford to inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and alternate evacuation and emergency routes designated to maintain response times during construction periods.
- A-PA-113 Please see Response to Comments A-PA-96 through A-PA-100, above.

- A-PA-114 The comment does not address the adequacy or accuracy of the environmental analysis presented in the Draft EIR or identify any other significant environmental issue requiring a response. Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts.
- A-PA-115 As explained in the Draft EIR Impact 5.8-8, any changes to the circulation network that may occur under the Project would be designed to accommodate appropriate emergency access to, and egress from, all areas of the Project site. Proposed improvements would be required as needed to enable existing aid emergency vehicles traveling from existing facilities to reach all development on the Project site. Additionally, all Project-specific designs, including private internal circulation and building site plans, shall be subject to review and approval by emergency service providers, per Fire Code requirements.
- Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- A-PA-116 The Draft EIR, in the discussion of Impact 5.15-2 and Impact 5.15-9, provides additional qualitative descriptions of the impact of the mitigation measures on pedestrian and bicycle conditions. If or when any of the mitigation measures are implemented, the responsible agency will be required to design and construct the improvements in compliance with all applicable design standards, which will ensure that the needs of bicyclists and pedestrians are considered.
- Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for justification of the use of the StreetScore+ methodology.
- A-PA-117 The Transit and Bicycle Capacity Analysis provides an analysis of capacity for bicyclists at gateway locations where Stanford commuter volumes would be the greatest, and is summarized in the Draft EIR (pages 5.15-167 to 169). As part of the project Stanford has proposed funding four sets of bicycle facility improvements; see Chapter 8, Special Considerations, of the Draft EIR.
- Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.
- A-PA-118 The comment is noted. Stanford reviewed the suggested improvements with its transportation consultant, Alta Planning and Design, as part of the proposed 2018 General Use Permit application process. Alta prepared the improvement maps in cooperation with PAUSD and the City of Palo Alto. These reflect best practices related to pedestrian and bicycle circulation on its campus.
- A-PA-119 Please see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for a discussion of the proposed Project's bicycle infrastructure improvements and funding.

A-PA-120 All of the EV charging spaces on campus are marked with signs that say “Electric vehicle parking only. Vehicles must be actively charging (fee required).” These spaces are marked as charging spaces, not parking spaces and are enforced as such. CA Vehicle Code 21113(a) enforces this restriction. Further, the cost of plugging-in a vehicle is currently \$2/hour; if plugged-in all day, the cost would be substantially more than the cost of an “A” permit. Data from June 2016 show that stations operating on campus have a turnover rate of roughly 2.5 to 5 charges per day, as indicated below:¹⁸

<u>Station</u>	<u>Average Number of Charging Sessions/Day</u>
TH Wallmount:	3.65
TH Station 1:	3.45
Station 1 TMU:	5.29
Station 2 TMU:	4.76
Station 1 PS-5:	2.34
Station 2 PS-5:	2.60
Station 3 PS-5:	2.48

A-PA-121 Please see Responses to Comments A-PA-80 to A-PA-82, above.

A-PA-122 Stanford continues to refine and expand the employee survey. Walk and bike modes reported from distant zones are likely a last mile response for individuals who use transit for the bulk of the trip. Rather than make that assumption, the data was reported for all modes and the auto responses were used for the trip distribution. Regarding the omission of East Palo Alto in Figure 5, Table 7 and Table 8 in TIA Part 1: Table 8 includes East Palo Alto, and the document has been revised to add East Palo Alto to Figure 5 and Table 7. Please note that, in the TIA Part 1, the label ‘Palo Alto North’ was used to encompass portions of both Palo Alto and East Palo Alto in Figure 5 and Table 7; the data and analysis are not affected by the label change.

A-PA-123 There was an error in Table 7 of Draft EIR Appendix TIA Part 1, which is corrected in the Final EIR. Please note that there was no error in the distribution of the actual trip assignment. Please see revised TIA in Appendix TIA-REV in this Final EIR for corrected text.

A-PA-124 Please to Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution for details on the methodology used to calculate the trip generation and trip distribution attributes of Stanford.

A-PA-125 Please see revised TIA in Appendix TIA-REV for corrected text.

¹⁸ See Appendix TRF-MISC in this Response to Comments Document.



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February 1, 2018

David Radar
County of Santa Clara
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95110

**RE: Palo Alto Unified School District (PAUSD) Comments Regarding the
County Draft EIR on the Stanford University Application for a 2018 GUP.**

**THIS IS THE FIRST SUBMISSION BY THE BOARD OF EDUCATION
IN THIS PUBLIC COMMENT PERIOD. ANY EARLIER
SUBMISSIONS WERE INDIVIDUAL COMMENTS.**

Dear Mr. Radar:

Thank you for the opportunity to comment on the County Draft Environmental Impact Report (EIR) regarding the Stanford University application for a 2018 General Use Permit. Our school district community members are very interested in this project and the Board of Education is pleased to provide comments regarding the recently released Draft EIR. In this letter, we have identified some concerns that we look forward to working on with you as you consider Stanford's application.

PAUSD values its partnership with Stanford University. Stanford is an elite university. Our school district is ranked as one of the premier school districts in the United States. We value our role in providing a service to the City of Palo Alto, the Stanford University campus, and portions of the towns of Los Altos Hills and Portola Valley, by providing the very best K-12 education for their children.

Our comments are as follows:

**1. Mitigation is Needed in the Form of an Elementary School Site for the
Northwest Area of Campus**

PAUSD is ranked as one of the very best school districts in the state. One of the quality attributes of the PAUSD is its system of neighborhood schools, available to students in its neighborhoods to walk and bike. This is seen as a particular benefit to building community for our students and their families. Today, there is no neighborhood school available to the families of Stanford faculty and staff living at the current Stanford West

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development nor for the residences planned in the 2018 GUP.

The current elementary school students generated by Stanford faculty and students attend Escondido and Nixon Elementary schools; and many are bussed to those locations. Today these schools are operating at capacity. A recent presentation by Stanford to the District presented a table of students/acre for the elementary schools, showed their analysis of maximum capacity of elementary school sites and observed that "Escondido and Nixon are some of the least dense sites in the District". However, Escondido is one of two PAUSD elementary schools that has enrollment over 500 and Nixon is currently at 440. The Board of Education considers reasonably small school size as important to education quality, and as a result the District rejects increasing capacity at these two sites as desirable.

Another alternative is to have the students (and/or their parents) cross busy El Camino Real and traverse the heavily trafficked Palo Alto downtown area during busy morning rush hour and then again in the mid to late afternoon. This is again rejected as it will contribute to traffic for those who choose to drive the students and will be unsafe for those who choose to walk/bike. This results in an increase in two-way daytime peak traffic.

A third alternative is to have the students attend a Barron Park neighborhood school. This route involves crossing the rapid traffic at Page Mill Road. Should parents drive their students, the driving distance is slightly in excess of four miles. This results in an increase in two-way daytime peak traffic.

The opening of another school on the Stanford campus is the only solution that preserves reasonable school enrollment size and avoids the very poor alternatives either making enrollment at Escondido/Nixon larger or dispensing with the value of a neighborhood school and creating an unacceptable travel burden for parents and students. It should be noted that the marginal cost of running a new elementary school is in excess of one million dollars a year.

One way to begin addressing this concern would be to move the "Potential School Site" identified in the Community Plan (currently adjacent to Deer Creek and Page Mill Roads) to a location on the Northwest side of campus. We respectfully request that this change be implemented to mitigate the transportation-based impacts that will be associated with residential development in the Quarry District. The current location of the "Potential School Site" does not address the transportation-related concerns we have raised in this letter.

2. **Seek a Stanford Commitment to Not Seek Exemptions for New Residences**

The recently completed Mayfield Project has 70 residential units, with one to three bedrooms. The property has an assessed value of \$43.3 million. However, Stanford applied for a BMR exemption and so the property is taxed based on a net assessment of \$3.1 million. This results in property tax revenue to PAUSD totaling \$13,787 or \$405 per student. PAUSD current operating funding/student is \$18,000 per student. This is a tremendous gap in ongoing funding. Our understanding is that the Quarry Road housing, if Stanford applies for exemptions, would have a similar property tax impact. A commitment needs to be made that no exemption applications will be made on Stanford developments associated with this GUP that house potential PAUSD students.

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cont.

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- 3. Revise the Student Generation Rate (SGR) to 0.98.**

The Draft EIR uses an unrealistically low student generation rate (SGR) of 0.5. This was taken from the year old DecisionInsite Residential Research Summary, Fall 2016. DecisionInsite has now released the DecisionInsite Residential Research Summary, Winter 2018. The information, based on multiple developments, shows rates ranging from 0.66 to 0.98, depending on the type of housing. Stanford developed an SGR of 0.38, using two older housing developments, one of which had only one student! Stanford has made no commitment to the type of housing that they will build for planned 550 units. Therefore, PAUSD needs to use the 0.98 SGR. This results in an estimate of over 500 students. The current DecisionInsite Annual Enrollment Projection, January 2018, and the Residential Research Summary, Winter 2018, are provided as Attachment A to this letter.

3
- 4. Build-Out Does Not Occur Incrementally**

The EIR states that “since build out would occur incrementally over a 17-year span, the school-age students generated by the Project would also occur incrementally over this span. This actually has not proven to be the case. Large developments are not incremental, they come in narrow bursts (Stanford West – 3 years, University Terrace – 2 years, Kennedy Towers – 1 year). This leads to surges in enrollment, often concentrated in a neighborhood and leading to corresponding pressure on individual schools. New projects attract younger families and this leads to bubbles that start in the early grades. A good example of this is Stanford West, where 70% of the students are in the elementary grades, as compared to 42% in the district overall.

4
- 5. Need PAUSD to Be Part of the Process for Input for Future projects under this GUP**

If Stanford discovers that they need more than 550 family housing units to support planned growth of over 9000 additional people on campus, PAUSD’s student capacity needs to be a formal part of the discussion and consideration.

5
- 6. Traffic and Safety Comments**

Our Safe Routes to School Committee has submitted comments regarding the impact of the GUP on our students’ daily commutes. These comments are provided as Attachment B to this letter. We request you address these comments. In addition to the issues outlined, Stanford should track traffic at peak times in two directions. Stanford will be generating trips out of the campus as well as into the campus. The residents of Stanford housing will be generating trips by faculty, students, and staff spouses to jobs outside of campus and trips to bring children to schools and after school activities outside of campus.

6
- 7. Do Not Rely on an Outdated Ten Year Forecast**

School enrollment projection firms are constantly emphasizing that while extending projections beyond five years is easy to do using spreadsheets, it should not be given weight in decision-making since the projections then involve projecting students who have not even been born yet. As information, the DecisionInsite 2018 forecast has been restricted to five years and now shows enrollment growth over the five years. We are seeing tremendous residential building in the Bay Area to house the population inflow. The City of Palo Alto has declared housing as its highest priority. The Stanford proposed GUP will result in additional enrollment growth.

7

8. Mitigate the Loss in Revenue Resulting from Stanford Housing Being Sold with Long Term Ground Leases rather than Fee Simple Title

Stanford faculty housing is sold with long term leases, currently 51 years, rather than a fee simple deed. As a result, sale prices do not reflect land values and are therefore significantly less than that of comparable properties in Palo Alto. This means they generate significantly lower property taxes than comparable properties in Palo Alto (even when old Palo Alto properties are not considered).

8

9. More On-Site Housing is Needed

The EIR estimates a population increase of about 9,600, but only 3,150 units of housing, so there is a concern that this will result in the University looking to purchase more residential properties in Palo Alto to lease to its faculty and staff. This has a negative impact on the amount of property taxes coming to the District because the University is able to request a property tax exemption and then enter into an agreement with their faculty. The net result is the District finds its revenues reduced when the University buys properties in the community (see also discussion under #2 and #8). The full mitigation of housing impacts on-site would mitigate against the need for the University to continue purchasing properties in the community as a strategy to increase its housing supply. The University should be required to provide additional on-site housing to accommodate the full population increase. Despite what the DEIR maintains, there isn't excess capacity in the community to absorb the increased demand.

9

These comments have been prepared by the PAUSD Board of Education and approved on January 30, 2018.

Thank you for the understanding you have shown PAUSD in providing time for the preparation of these comments. Please contact me with any questions you might have or information you might need during the remainder of the Stanford GUP process.

Sincerely,



Karen Hendricks
Interim Superintendent of Schools

cc: Board of Education Members
Cathy Mak
Robert Golton
Kirk Girard
Kavitha Kumar
Jean McCown
Catherine Palter
Joe Simitian

TRAFFIC AND SAFETY COMMENTS

Key Issue #1: No New Net Commute Trips

DEIR Summary: Stanford has a goal (not a commitment) of “no new net commute trips” in relation to their building projects. Their primary method of achieving this goal is by shifting 7% of all commuters from auto to Caltrain (Vol 2, p. 5.15-156). They have two monitoring methods (physical traffic counts twice per year from 7-9am and 4-6pm, and employee transportation surveys (Vol 2, p. 5.15-83)) and a commute club with incentives for active commute choices. In areas where new net commute trips are unavoidable, they have suggested mitigation efforts. “Stanford has committed to continue to implement programs to achieve the No Net New Commute Trips standard during the remainder of the 2000 General Use Permit, and to expand those programs throughout the life of the proposed 2018 General Use Permit.” (Vol 2, p 5.15-3).

Note: The hospital is out of the scope of the GUP and therefore they do NOT count hospital trips (Vol 2, p 5.15-87).

Proposed Mitigation Efforts:

- In order to achieve the no new net commute trips standard, Stanford is increasing on-campus housing, providing convenient support services on campus (childcare and transportation hub) and expanding the transportation demand management (TDM) Program (Vol 1, p. 3-25).
- Stanford has committed that they will pay a “fair share” for improvements/mitigations measures for adversely affected intersections (Vol 2, p. 5.15-74).
- Stanford will pay the county a cost-per-trip fee if they fail to meet the no new net commute trips standard over 2 out of 3 years (Vol 2, p. 5.15-90).
- They have requested car trip credits in return for funding bicycle infrastructure improvements (Vol 2, p. 8-1).

Suggested Questions/Comments:

It is important for Stanford to support Safe Routes to School infrastructure in order to maintain this goal and avoid deterring families from active commute choices.

- | | | |
|--|---|----|
| • Could commute club incentives be increased to further promote alternative commutes? | I | 10 |
| • Could Stanford find ways to encourage commuting parents to bike/walk to Stanford after biking/walking their kids to school? | I | 11 |
| • How will Stanford expand the TDM program to achieve this 7% increase ridership on Caltrain? | I | 12 |
| • Specifically, how will Stanford avert an overall increase in car trips (with related safety and congestion impacts) on Palo Alto collector and arterial streets that serve as school routes if their mitigation plans are weighted toward intersection capacity increases? | I | 13 |
| • The morning school commute time is covered by the morning peak hour cordon count, but the afternoon school commute time is not. Can an additional cordon count be done in the afternoon to understand how Stanford auto commuters are impacting foot-powered PAUSD school commuters and possibly trigger appropriate mitigations to protect school commute safety? | I | 14 |

Key Issue #2: Housing

DEIR Summary: Stanford projects to grow faculty/staff/students as well as “other workers” by over 9000 individuals (Vol 1, p.5.12-2) over the 17 year period with a projected demand for 2425 off-site housing units (Vol 1, p.5.12-18).

Proposed Mitigation Efforts:

Stanford plans to build the following net new housing options on-site (Vol 1, p.5.12-15):

- 1700 undergrad beds
- 900 grad beds
- 550 faculty/staff dwellings

They are proposing elimination of the 6-mile radius for new affordable housing projects supported by their payments to the affordable housing fund. Instead, payments made under the proposed 2018 General Use Permit would support development of affordable housing within one-half mile of a major transit stop or a high-quality transit corridor (Vol 1, p.5.12-20).

Suggested Questions/Comments:

- | | | |
|--|---|----|
| • Could more housing be built on campus to reduce long distance commuters? | I | 15 |
| • Please study the transportation impacts of moving affordable housing funds out of the 6-mile radius (consider challenges of child care drop-off/pickup and other limiting factors that reduce transit use). | | 16 |
| • Does the proposal for locating affordable housing within one-half mile of major transit specify efficient transit routes directly to Stanford? Are these housing units going to be given priority to Stanford affiliates? | | 17 |
| • How do we know that all beds/dwellings are being filled? Is Stanford building the right kind of units for demands? Are the sales/rental prices appropriate for the customers? This is important information to have in order to hold Stanford accountable for housing as many employees/students on campus as possible, as the demand for housing is clearly there. Stanford should include housing vacancy rates by type of housing in its annual monitoring reports to the County. | | 18 |

Key Issue #3: School Overflow

DEIR Summary: Stanford predicts an additional 275 students to the district in relation to their projects over the 17 year period. They use a “school aged generation rate method” also used by PAUSD (Vol 1, p.5.13-16). The additional housing numbers used in the school-aged children generation calculation was 550, referring to the number of Staff/Faculty multi-family dwellings proposed for the project, currently the 900 additional grad beds in the project are intended to be child free units.

Note: There were two inaccuracies in the data for Current Enrollment at Baron Park (Stanford data 442 vs. PAUSD Data 287) and Duveneck elementary schools (Stanford data 492 vs. PAUSD Data 439) (Vol 1, p.5.13-5).

Proposed Mitigation Efforts: Stanford has determined that PAUSD enrollment numbers are projected to trend down as they build new housing resulting overall in minimal impact to school populations and thereby exempt from mitigation efforts. They are committed to paying the standard, current, government mandated per pupil fees as applicable (Vol 1, p.5.13-17).

Suggested Questions/Comments:

- Currently trends in elementary enrolment show the two schools on Stanford’s campus are already at/overcapacity often necessitating overflow to other schools in the PAUSD district. The other schools in the district are 1-2 miles away and across very busy roads. Given that an influx of new students to the campus in relation to new housing is possible, how can Stanford assist in these kids getting to a school without adding auto trips for parents living on campus who might normally walk or bike themselves to work?

19

Key Issue #4: School Route Intersections

DEIR Summary: Stanford screened 125 intersections for potential adverse effects due to their projects. They landed on 79 intersections to study based on an estimation of >10 new trips. Stanford reviewed the “WalkAbout” maps created specifically to address suggested school route improvements at Nixon and Escondido (Vol. 2 p. 5-15-112)

Mitigation Efforts: Each intersection includes a discussion of mitigation suggestions to accommodate the additional trips.

Suggested Questions/Comments:

- The DEIR is missing a summary of affected intersections in relation to the PAUSD Walk and Roll Maps (available online here: <http://www.cityofpaloalto.org/gov/depts/pln/transit/saferoutes.asp>) to ensure the accuracy of impact determination and applicability of mitigation efforts on STUDENT walkers/cyclists. With roughly 55% of PAUSD students walking or biking to school, these intersections need to stay protected to maintain high student walking and cycling rates (and keep additional parent drivers off the road).
- At some intersections, there were “no mitigation options available”. Was funding/supplying crossing guards at these intersections considered? Are there other actions that Stanford can take nearby to compensate for the potential deterioration of these intersections?

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Key Issue #5: Embarcadero Road

DEIR Summary: Stanford has identified Embarcadero Road as a major route from the freeway which will undeniably see additional traffic in relation to projects. Intersection #48 (Embarcadero/El Camino) and Intersection #66 (Embarcadero/Middlefield) both have minimal to no mitigation efforts available. One intersection is in front of Paly, the other in front of Walter Hays and near Jordan.

Proposed Mitigation Efforts: Stanford has suggested adding another left turn lane by narrowing the current lanes or removing parking on El Camino (Vol 2, p.5-15-131). Stanford has determined that Intersection #66 has no feasible mitigation efforts ((Vol 2, p.5-15-131).

Note: Stanford noted that the City of Palo Alto currently designing improvements to this intersection to improve bicycle safety. (Vol 2, p.5-15-131).

Suggested Questions/Comments:

- The mitigation discussion was focused on improvements to El Camino, but not directly on Embarcadero. Stanford should financially support improvements to the railroad crossing at Alma and Embarcadero to widen the narrow road in front of Paly and Town and Country. 22
- Could Stanford consider an offsite park and ride location near the 101 to prevent some of the auto trips on Embarcadero? 23
- Churchill Avenue between Alma and El Camino is a busy intersection for PAUSD school children and was not mentioned as an area adversely affected in the study. Could improvements to this rail crossing and alternative entry to Stanford Campus support active commute options as well as benefitting the student walkers and cyclists to Paly and Walter Hays? 24
- Can Stanford get an update from the City of Palo Alto and consider the new improvements in their mitigation assessment and commit to ensure that any mitigation efforts do not adversely affect the City's planned improvements? 25

Key Issue #6: Parking

DEIR Summary: Part of Stanford's strategy for reducing trips to campus is by restricting parking availability and charging high fees for parking passes. They have seen decreases in permits sold in correlation with these enhanced TDM programs (Vol 2, p.5.15-170). Parking pass rates range from \$400 to over \$1000 per year.

Proposed Mitigation Efforts: Stanford assumes that employees will not try and park on local streets because of new Palo Alto parking rules and accessibility (Vol. 2 p. 5.15-173).

Suggested Questions/Comments:

While the availability and accessibility of free street parking in Palo Alto for purposes of getting to Stanford is very limited, the issue should still be monitored.

- Could the question of off-site parking should be included in the employee travel surveys?
- Could a monitoring program (of more substance than a simply survey) be developed to verify significant abuse of this system?

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Key Issue #7: "Sweeteners"

DEIR Summary: Stanford would fund \$250K infrastructure improvements in Palo Alto to connect existing bicycle facilities at Bol Park and the Stanford Perimeter Trail, as well as improving lighting and landscaping at Bol Park. The Bol Park Path is a heavily used bicycling and walking route that serves travellers to Escondido Elementary School, Terman Middle School, Gunn High School, the Stanford Research Park, and the Stanford campus.

Stanford would also fund \$450K for improving the connection of the bicycle/ped bridge over 101 from Newell to East Palo Alto (Vol 2, p. 8-2).

Suggested Questions/Comments:

- Can Stanford be more specific about the improvements we can expect along this entire route, including connectors to Hanover? Cyclists ride on the side walk so that they don't have to cross the street into traffic where most cars far exceed the speed limit going down a hill and approaching a turn.
- Are these firm limits on funding sufficient to realize the projects? Could Stanford commit to fund them fully without putting a limit on the project cost?

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5.2.1.10 Responses to Comments from Palo Alto Unified School District

- A-PAUSD1-1 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts, and Topic 2: Additional School Site.
- A-PAUSD1-2 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA. State law also establishes exclusive mitigation for school impacts and preempts local authority on this issue. Also, this comment does not specifically address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- A-PAUSD1-3 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- A-PAUSD1-4 As discussed in the Draft EIR Project Description (page 3-33), under Stanford’s proposed Project, new housing would be built incrementally over the course of the 2018 General Use Permit, minimizing any potential for a surge in enrollment in public schools. Furthermore, even if, as the commenter asserts, new housing development were to attract families with younger children, since the new Project housing would be introduced over the 18-year life of the general use permit, the younger children would similarly be introduced to the public school system across the duration of the general use permit.
- Development of individual family housing projects at Stanford would be discrete, similar to housing projects developed in the remainder of the school district boundaries. This is why enrollment forecasters frequently update their projections and monitor the anticipated new housing in their districts. Stanford regularly meets with the School District to provide schedule information about upcoming housing projects.
- Stanford West is a mature project that opened in 2000 and data do not exist with regard to its K-12 enrollments upon opening. However, as shown in Master Response 12, Topic 1, Table MR12-1, the 2016 yield rate for the multi-family homes at Stanford West was 0.39 K-12 students per unit, lower than multi-family rates in the rest of the district. Using the commenter’s statement that 70 percent of the students at Stanford West are K-5, the elementary student yield rate from Stanford West is 0.27 elementary students per unit (70 percent of 0.39). This is closely similar to the elementary student yield rate of 0.23 that the district uses for new multi-family units (see Response to Comment A-PAUSD2-2).

The 180 homes at University Terrace will open over the course of three academic years, and the actual student yield from these homes has been anticipated by the district for several years, although the actual numbers are not yet known. The Kennedy Towers are for single and married graduate students and therefore did not result in the addition of any new school-aged children in the district.

- A-PAUSD1-5 With respect to the process for the County’s consideration and approval of individual projects that would occur under the proposed 2018 General Use Permit, please see Master Response 4: Topic 1: Use of Program EIR and Subsequent Approvals. As discussed in the Draft EIR Project Description (page 3-23), under the proposed 2018 General Use Permit, Stanford seeks a condition that would allow it to build additional housing beyond the proposed development limit of 3,150 housing units/beds. Such development, were it to occur, would be subject to additional environmental review and approval by the Planning Commission.
- A-PAUSD1-6 AM and PM weekday peak periods were selected to evaluate worst-case traffic conditions and reflect typical peak commuting conditions. These evaluation periods were selected in accordance with the Santa Clara Valley Transportation Authority (VTA) Guidelines Technical Procedures, which is referenced on Draft EIR page 5.15-8 under Methodology for Identifying Intersections for Study. While other peaks in traffic may occur at other times throughout the day and on weekends due to other types of activity (e.g., school, leisure, etc.), commuting trips to and from work during the AM and PM weekday peak periods are typically found to result in the highest levels of traffic in urban and suburban settings and are thus considered the preferred traffic levels to measure for a conservative (worst case) analysis. School trips typically have a pronounced effect on overall traffic conditions, especially during the AM peak period when students arrive at school.
- Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading, Figures MR13-4, MR13-7, and MR13-8, illustrate that the combined peak travel into and out of the campus (in both the commute direction and non-commute direction), as well as the peak travel in the peak commute direction, is happening between 8-9am and 5-6pm.
- Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis conducted to address the impact of reverse-commute trips.
- A-PAUSD1-7 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- A-PAUSD1-8 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property

tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA. State law also establishes exclusive mitigation for school impacts and preempts local authority on this issue.

- A-PAUSD1-9 As explained above, state law establishes mitigation for school impacts and preempts local authority on this issue. Property tax assessment methods are also governed by state law.

With respect to the comment's request for more housing, please note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed.

- A-PAUSD1-10 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for detail on the no net new commute trips policy.

- A-PAUSD1-11 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for detail on the no net new commute trips policy.

- A-PAUSD1-12 As explained on page 5.15-155 of the Draft EIR, the mode share analysis used to assess the capacity of Caltrain to handle increased Stanford ridership was based on a worst-case conservative approach and shifted the full number of drive-alone commuters needed to achieve the no net new commute trips standard to the rail mode. As such, rail mode share is assumed in the transit capacity analysis to increase from 23.1 percent in 2015 and 2018 to 29.9 percent in 2035. This is a conservative, worst-case approach because it is unlikely that all necessary drive-alone trips would be shifted to rail. Stanford may choose to provide additional bus service, either by funding increased service provided by public transit providers or by running its own buses. Similarly, bicycle mode share may increase under an Expanded TDM scenario due to Stanford's funding of additional bicycle infrastructure in nearby communities. There are many tools available for Stanford to move drivers from single-occupancy vehicles to other modes of transportation.

Please also refer Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for additional information on the no net new trips policy.

- A-PAUSD1-13 Please see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for the discussion of bicycle and pedestrian safety.

- A-PAUSD1-14 The cordon count methodology was designed to capture the peak commute hours (i.e., vehicle trips to campus in the morning and exiting the campus in the evening), which are 8-9 am, and 5-6 pm. The afternoon school commute time would not coincide with peak hour traffic (5-6 pm).

Regarding impacts to pedestrian and bicycle safety, the Draft EIR's significance criteria focus on whether the Project would result in physical impediments to pedestrian and bicycle travel, or physical changes to roadways and intersections that could present safety hazards. In addition to these safety-related factors, reducing overall VMT also provides safety benefits.

The 2018 General Use Permit VMT analysis presented in the Draft EIR demonstrates that the Project would result in infill development that would exhibit low VMT, well below regional benchmarks on a per-worker and per-resident basis. Therefore, the Project would have a beneficial effect on safety based on the current safety research described above. It is also noted that, under the 2018 General Use Permit, Stanford would continue to provide transit and transportation demand management measures, improving these services and programs over time as conditions require.

Please see also Master Response Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for the discussion of bicycle and pedestrian safety.

- A-PAUSD1-15 As discussed in the Draft EIR Project Description (page 3-23), under the proposed 2018 General Use Permit, Stanford seeks a condition that would allow it to build additional housing beyond the proposed development limit of 3,150 housing units/beds. Such development, were it to occur, would be subject to additional environmental review and approval by the Planning Commission.

Please also note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of on-campus housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed on the Stanford campus.

- A-PAUSD1-16 to A-PAUSD1-17

As described on page 4-4 of the Draft EIR, Stanford proposes that the affordable housing fee contribution support development of affordable housing within one-half mile of a major transit stop or a high-quality transit corridor as defined by SB 375, which includes fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours. Promotion of

affordable housing near major transit corridors would help to reduce vehicle miles traveled and associated GHG emissions, both of which are in keeping with the goals of Plan Bay Area 2040. This is a policy decision to be made by the decisionmakers when considering the Project.

Please also Master Response 10: Affordable Housing, Topic 5: Geographical Distribution of Affordable Housing Funds.

A-PAUSD1-18 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA comments.

A-PAUSD1-19 The source for the existing PAUSD school enrollment data was not from Stanford as the comment indicates, but from the California Department of Education Educational Demographics Unit, Enrollment by Grade for 2016-2017 for the PAUSD. A review of the latest 2016/17 enrollment report from CDE for PAUSD notes that four school enrollments that are slightly higher or lower than that presented in the Draft EIR. Please see Chapter 2 in this Response to Comments Document for corrected enrollment estimates for Barron Park and Duveneck Elementary Schools, and Gunn and Palo Alto High Schools. These revisions do not change any conclusions in the Draft EIR.

The comment states the two elementary schools on the Stanford campus are already at capacity or overcapacity, and requests clarification for how Stanford would direct new students to schools further away without adding auto trips for parents.

However, published reports of PAUSD indicated that there were 32 available elementary classrooms, including at both Nixon and Escondido schools in 2017-18 and that elementary enrollment was expected to decline.¹⁹

As outlined in Chapter 3, Project Description, under the 2018 General Use Permit, Stanford plans to construct several bicycle and pedestrian supportive projects on the Project site that are designed to serve local area student trips to the Nixon and Escondido Elementary Schools. Stanford proposes to construct the improvements on the Project site that have been identified by the PAUSD and the City of Palo Alto as Suggested Routes to Schools. Circulation improvements on Stanford lands in and around Nixon and Escondido Elementary Schools could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, and wayfinding signs and additional traffic control.

Refer also to Master Response 12: Public Schools, Topic 2: Additional School Site.

¹⁹ Enrollment and Class Size Summary. Palo Alto Unified School District. September 12, 2017 page 8.

A-PAUSD1-20 Intersection impacts are determined based on the additional vehicular demand and its effect on the available capacity. As explained in Response to Comment A-PAUSD1-14, impacts to pedestrians and bicyclists are evaluated based on whether the Project would result in physical impediments to pedestrian and bicycle travel, or physical changes to roadways and intersections that could present safety hazards. The proposed Project does not include any components that would result in physical impediments to pedestrian and bicycle travel, or physical changes to roadways and intersections that could present safety hazards. However, the proposed Project could result in construction of intersection improvements to mitigate impacts from increased vehicle traffic. Therefore, the Draft EIR evaluates potential changes in intersection geometry are proposed as part of a mitigation measure to determine whether such changes would impede pedestrian and bicycle travel or present a safety hazard.

As described beginning on page 5.15-60 of the Draft EIR, StreetScore+ was chosen to evaluate bicycle and pedestrian Quality of Service (QOS) at signalized intersections that may be changed due to identified mitigation measures. The analysis of potential impacts to bicyclists and pedestrians using intersections where mitigation measures are proposed is provided on pages 5.15-91 to 5.15-94 of the Draft EIR for 2018 Baseline with Project conditions and pages 5.15-124 to 5.15-134 of the Draft EIR for 2035 Cumulative with Project conditions. Based on the StreetScore+ methodology, the Draft EIR concludes that none of the proposed mitigation measures for intersections located in Palo Alto (or near a PAUSD school) would adversely affect bicycle or pedestrian QOS.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, for further discussion of bicycle and pedestrian safety.

A-PAUSD1-21 The five intersections where no feasible mitigations were identified would not experience pedestrian safety impacts due to increased traffic congestion. As shown in Draft EIR Table 1, the intersections include Middlefield Road/Oregon Expressway, Foothill Expressway/Hillview Avenue, Middlefield Road/Lytton Avenue, Middlefield Road/Embarcadero Road, and Foothill Expressway/Edith Avenue. These intersections are all signalized, providing protected pedestrian crossings. The proposed Project would not result in a need for crossing guards as mitigation.

A-PAUSD1-22 The Draft EIR identifies the addition of a second northbound left-turn lane at Intersection #48 (El Camino Real / Embarcadero Road) because that mitigation measure would directly reduce the proposed Project's impact on the intersection to a less-than-significant level. Improvements along Embarcadero Road would reduce delay at this intersection, but not to the less-than-significant level that the second northbound left-turn lane would provide.

- A-PAUSD1-23 Historically, Stanford has focused its efforts on moving drivers to transit and other alternative transportation modes in order to remove vehicle trips from both local streets and regional freeways. While Stanford could potentially receive trip reduction credits for an offsite facility such as a Park-and-Ride, this is not a means that Stanford currently intends to employ.
- A-PAUSD1-24 Please see Impact 5.15-2 (page 5.15-74 of the Draft EIR), 2018 Baseline Conditions, and Impact 5.15-9 (page 5.15-112 of the Draft EIR), 2035 Cumulative Conditions. Churchill Avenue at El Camino Real is presented as intersection #42 and Churchill Avenue and Alma Street is presented as intersection #57 in the transportation analysis.²⁰ The Draft EIR finds that the proposed Project would not have a significant traffic congestion impact at the two intersections under 2018 Baseline and 2035 Cumulative with Project conditions. Therefore, no intersection modifications are proposed at these locations that would have the potential to impede pedestrian and bicycle travel, or that would present a safety hazard. As explained in Response to Comment A-PAUSD1-14, the potential addition of more vehicle traffic to local roadways, without a corresponding change to a roadway or intersection configuration, should not be assumed to result in a significant impact to pedestrian and bicyclist safety. The Project does not propose alternative entries to the campus, as mentioned in the comment.
- A-PAUSD1-25 The intersection improvements identified in the Draft EIR draw heavily on mitigation measures from adopted plans and studies, such as the County of Santa Clara's Expressway Plan 2040 and the ConnectMenlo Final EIR. As stated at the end of Mitigation Measure 5.15-2 on page 5.15-90 of the Draft EIR, the priority order for funding intersection improvements in the event Stanford does not achieve the no net new commute trips standard will be determined by the County Planning Office in consultation with affected jurisdictions, including Palo Alto. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.
- A-PAUSD1-26 The Commute Survey includes a similar question: "Where do you park your vehicle when you commute to campus/work?" Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for additional detail related to Stanford affiliates parking off-campus.

²⁰ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

A-PAUSD1-27 Most of the parking locations in the vicinity of the campus are either private or are subject to parking restrictions and, as such, would not be expected to enable people to park outside the campus and walk, bicycle, or use Marguerite shuttles to access the campus. Please see the discussion of off-campus parking restrictions starting on page 5.15-173 of the Draft EIR.

Please also see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for additional detail related to Stanford affiliates parking off-campus.

A-PAUSD1-28 The proposed improvements raised in the comment are described in the Draft EIR Chapter 8, Special Considerations, Subsection 8.1.3. No additional detail is available on these improvements at this time. As discussed in that chapter, the off-site improvements may be subject to further design refinement; would be considered for approval by the jurisdictional agencies in which these off-site improvements are located; and if approved, the off-site improvements would be constructed and maintained by those applicable agencies.

A-PAUSD1-29 As discussed in Draft EIR Chapter 8, Special Considerations, Subsection 8.1.3, Stanford proposes to contribute an amount of funding toward the design and implementation of the improvements that is presently estimated to fund the cost of these improvements.

See also Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.

Please note that Comment Letter A-PAUSD1 contained an Attachment A, which did not comment directly on the Draft EIR. Consequently, no responses to Attachment A are provided. This attachment is included in Appendix A-PAUSD1 in this Response to Comments Document.



- **The GUP / EIR – getting the analysis right**
- **What’s important – creating a neighborhood school for an emerging neighborhood**
- **What’s concerning – cumulative impact of potential housing vs. school site capacity**

1



- **The GUP / EIR – getting the analysis right**

- Student Generation Rates (SGR) – no good basis for 0.5
- 10 year enrollment forecast should not be used
- Expect surges, not gradual growth, over years, across grades

2

- What's important – creating a neighborhood school for an emerging neighborhood
- What's concerning – cumulative impact of potential housing vs. school site capacity



- “This EIR uses student generation rates ... of 0.50 [children per household].” (p 5.13-16)
 - Based on PAUSD’s enrollment forecast
 - Also used by City of Palo Alto Comp Plan EIR (which used the same source)
 - Source: DecisionInsite Residential Research Summary, Fall 2016, p. 3 (below).

Student generation rates are determined for each product type for each school level: elementary, middle, and high school. The Moderate student generation rates are based on factors calculated from recent housing projects of similar product types within the district. For more information regarding these calculations, please refer to Appendix B. Table 2 below shows the Moderate student generation rates by unit type.

Table 2
Moderate Student Generation Rates by Unit Type

School Level	SFD Units	SFA Units	MF Units
Elementary School (K-5)	0.38	0.31	0.23
Middle School (6-8)	0.19	0.16	0.12
High School (9-12)	0.25	0.21	0.15
Total	0.82	0.68	0.50

2
cont.



Appendix B
Student Generation Rates Assumptions

Palo Alto Unified School District
Student Yields for New Developments since 2011

Student Yields for New Developments since 2011

- Only two listed projects are primarily “Multi-Family”
- The 0.5 SGR is derived from those two projects only, with SGRs of 0.0 and 0.7, one of which does not house “families.”
 - Treehouse is 95% studios, not designed for families
 - **The one true MF project listed has an SGR of 0.70**

Housing Type

	Name of Completed Project	May2015 Student Yield ^[1]	Yearbuilt	Unit Type and Product Description	# Units	May2015 Student Residents
SFU & TH	Sterling Park 3270-3290 W Bayshore	0.67	2011	28 SFUs (15 large SFUs, 13 small "patio" SFUs) 21 four-bedroom, 7 five-bedroom 68 townhomes and condos 23 one-bedroom, 10 two-bedroom, 35 three-bedroom	96	64
SFU & TH	Altaire Altaire Walk	0.79	2011	103 owner-occupied SFUs and TH-style Mix of 2, 3 and 4 bedroom Homes sold from \$450,000 to \$950,000 No senior or low-income housing	103	81
SFU	Olmstead Terrace Stanford Housing	0.82	2012	39 owner-occupied SFUs 32 one-bedrooms / 1,930 - 2,250 square feet 7 four-bedrooms / 2,400 square feet (Also 25 additional rental units)	39	32
Studio Apts	Tree House 488 West Charleston	0.03	2013	35 Apartment rentals, low income housing 33 studios 2 one-bedroom (1 manager unit)	35	1
SFU & TH	Alma Plaza 3445 Alma Street	0.06	2015	37 SFUs and TH-style 14 Apartment rentals, low income housing 12 one-bedroom / 700 avg. square feet 2 two-bedroom / 800 avg. square feet	51	3
Multi-Room Apts	Alma Housing/Eden Housing 801-875 Alma Street	0.70	2015	50 Apartment rentals, 100% Affordable 8 one-bedroom / 545-600 square feet 26 two-bedroom / 938 square feet 16 three-bedroom / 1,188 square feet	50	35

[1] May2015 Student Yield calculated by dividing the May2015 student residents by the project's total number of units.

5.2.1-171

2
cont.

Comment Letter A-PAUSD2



- **Unless Stanford commits to building only multi-family units, why would the EIR use a multi-family-only average?**
 - Stanford also builds SFU/TH housing, such as Olmstead Ct., SGR=0.82 and at the new University Terrace development
 - **Using a low MF-only rate makes sense only if we are confident what will be built and to whom it will be rented, as at Kennedy Towers or Oak Creek Apartments**

- **“Displacement effect” can’t be ignored**
 - New housing for seniors and grad students frees up existing housing for potential use by families, some of which is in PAUSD
 - VI example – specifically built to encourage retired faculty to move from on-campus single family homes, making room for new faculty families
 - No data to accurately quantify, but definitely greater than zero – **should be applied to the 2900 new graduate student units to be built under the current and proposed GUP**

2
cont.

3



- **“PAUSD estimates a decline in its elementary and middle school student enrollment between 2016/17 and the 2026/27 school years” (p 5.13-6)**
 - This statement is correct, based on the DI report, but...
 - **PAUSD does not use DecisionInsite’s 10 year forecast for any purpose**, and hence does not carefully review its assumptions, methods, or conclusions
 - The assumptions and methods are not, in fact, appropriate for 10 year forecasts, so the results should be ignored
 - No demographic considerations whatsoever (births, family stage-of-life, deaths, demographic mix-shift, etc.). DI is not a demographer.
 - Arbitrary number of new housing units (70/year)
 - Simplistic and static projection method (four year average trend projection of K enrollment plus historical progression ratios)
 - **We don’t use or rely on this forecast – no one else should either!**
 - **In the absence of a reliable forecast, suggest using the current enrollment level – it’s the most recent data and we know it’s right**

4



- **“Since buildout ... would occur incrementally over a ... 17 year span, the school-age students generated by the Project ... would also occur incrementally over this span.” (p 5.13-16)**
 - In fact, large developments are not “incremental” – they come on line in narrow bursts – Stanford West (3 years), University Terrace (2 years), Kennedy Towers (one year?)
 - This leads to “surges” of enrollment, often concentrated in one place over a short time frame = pressure on neighborhood and district school capacity that travels through the grades over time (a “bubble”)
 - New projects generate disproportionate enrollment in the early grades – new housing is predominantly occupied by younger families
 - Especially true at Stanford – for instance, students from Stanford West are 70% in the elementary grades, vs. 42% for the PAUSD as a whole
- **We should not assume students come in spread over time, space, and grades – in fact, we should assume high concentration, creating local “bubbles” that stress local capacity**

5



- The GUP / EIR – getting the analysis right

- **What's important – creating a neighborhood school for an emerging neighborhood**

- Stanford builds neighborhoods, PAUSD builds schools
- Stanford West – an emerging neighborhood
- Need for a neighborhood elementary school

6

- What's concerning – cumulative impact of potential housing vs. school site capacity

Elementary School Planned In Escondido Village Area

Five acres at the corner of Stanford Ave and Escondido Rd will be the site of Palo Alto's first elementary school on the Stanford campus since the 1920s. **Palo Alto has been considering a school on the campus since Stanford first decided to build Escondido Village in 1957.**

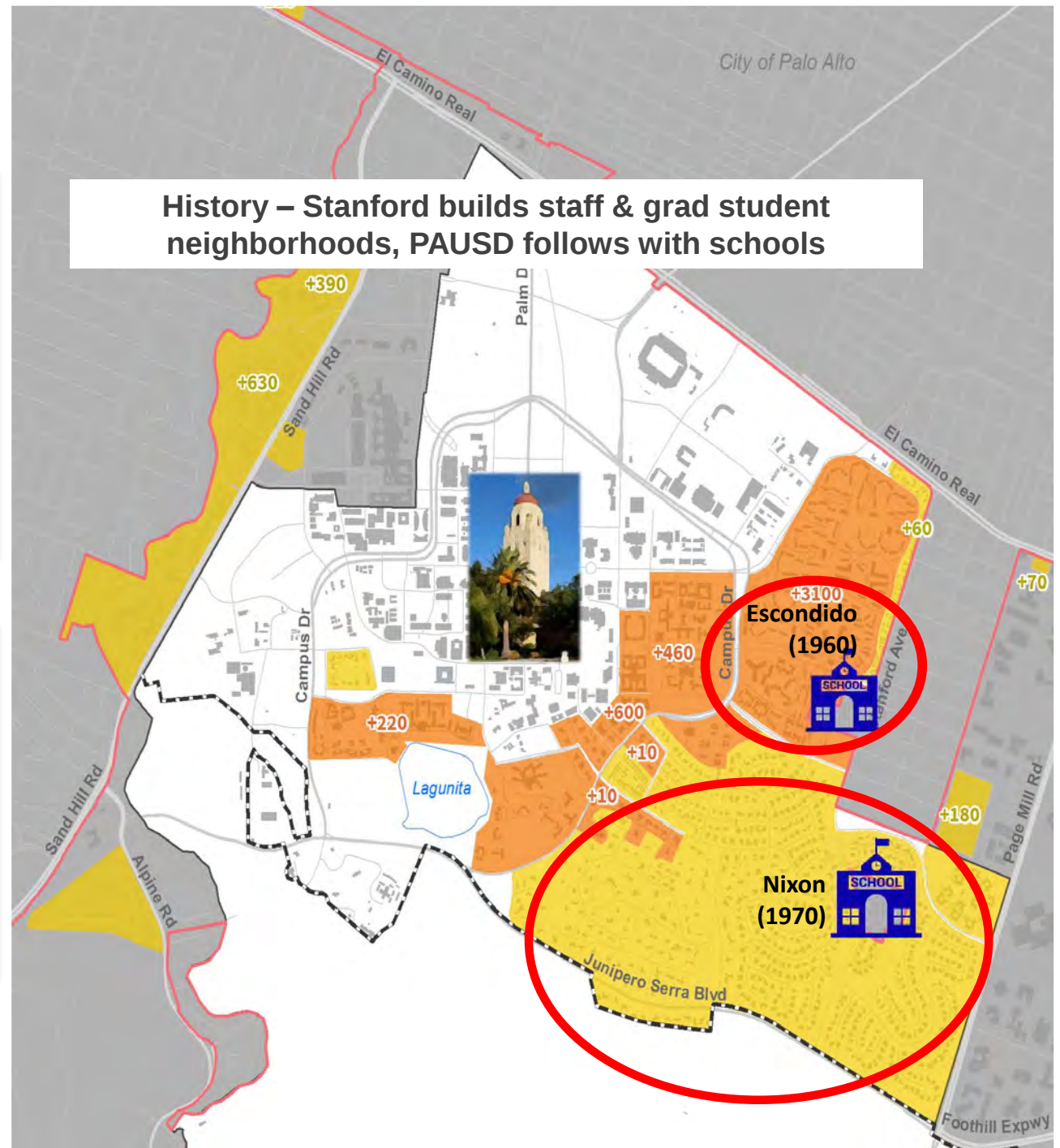
-Stanford Daily, 1959

New Homes For Faculty To Be Completed By July '68

New Stanford faculty homes will soon be rising near the **east edge** of campus. The new 190 lot development, known as **Frenchman's Hill**, is near the corner of Page Mill Road and Foothill Blvd., adjacent to homes in the **Pine Hill** subdivision.

-Stanford Daily, 1967

History – Stanford builds staff & grad student neighborhoods, PAUSD follows with schools



Pearce Mitchell

- Occupied 1976
- 82 units, 1-3 BRs
- 2016 students: 14

Other Sand Hill Road

- Oak Creek (1969) (20 for children)
- Welch Rd (1987) (1 student)
- 2016 Students: 39

Stanford West

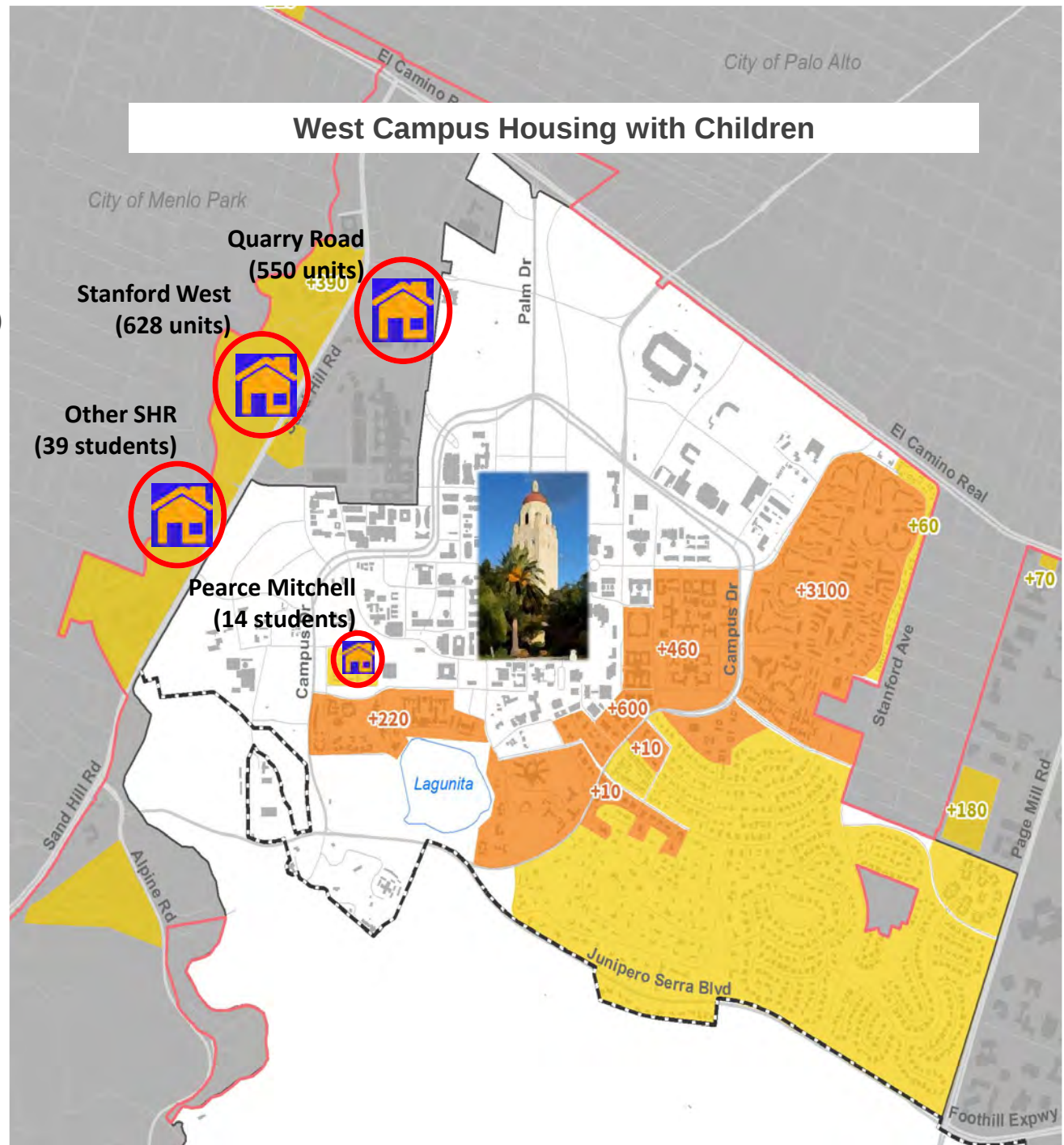
- Occupied 2001-2003
- 628 units, 1-3 BRs
- 2016 students: 247

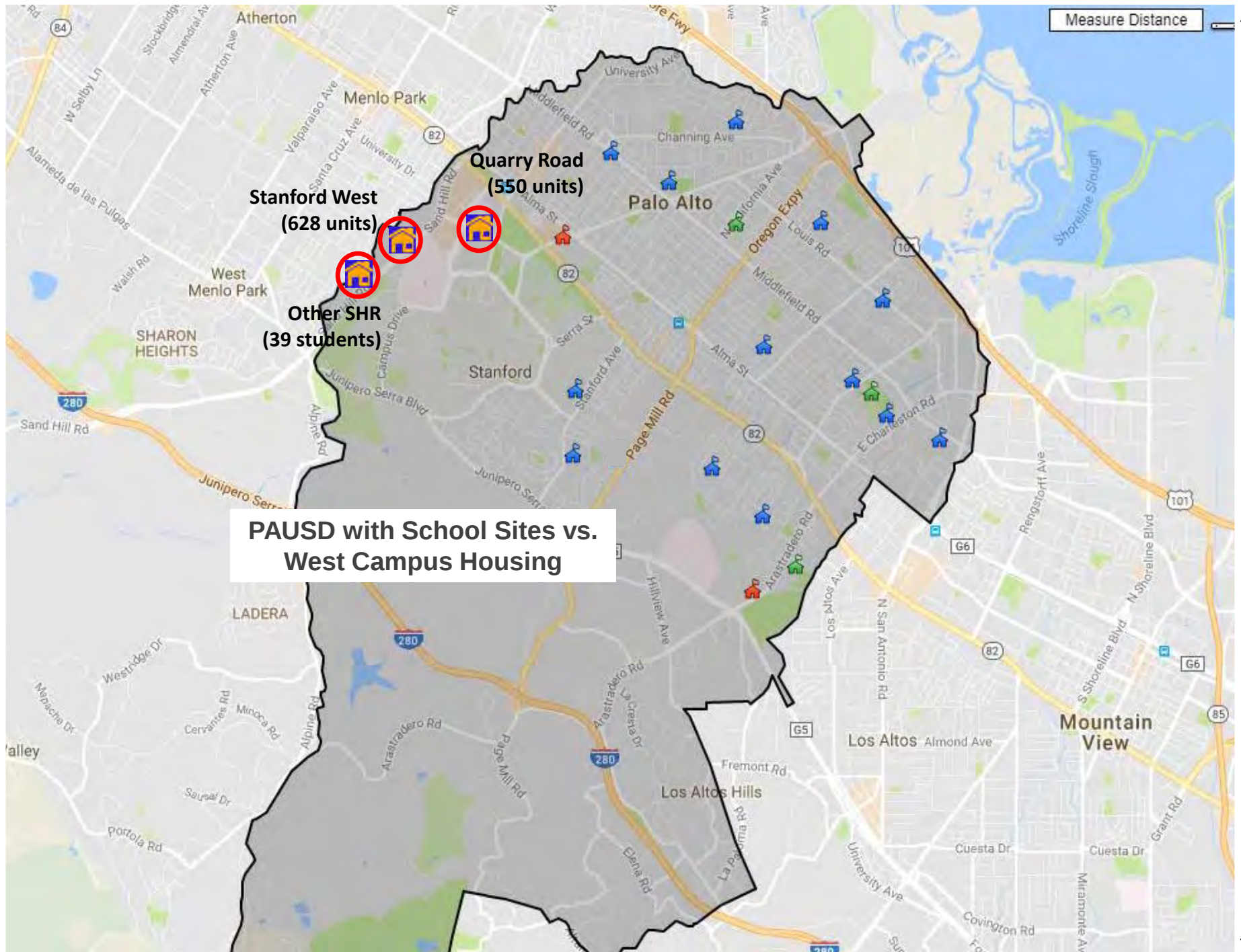
Proposed In New GUP**Quarry Road**

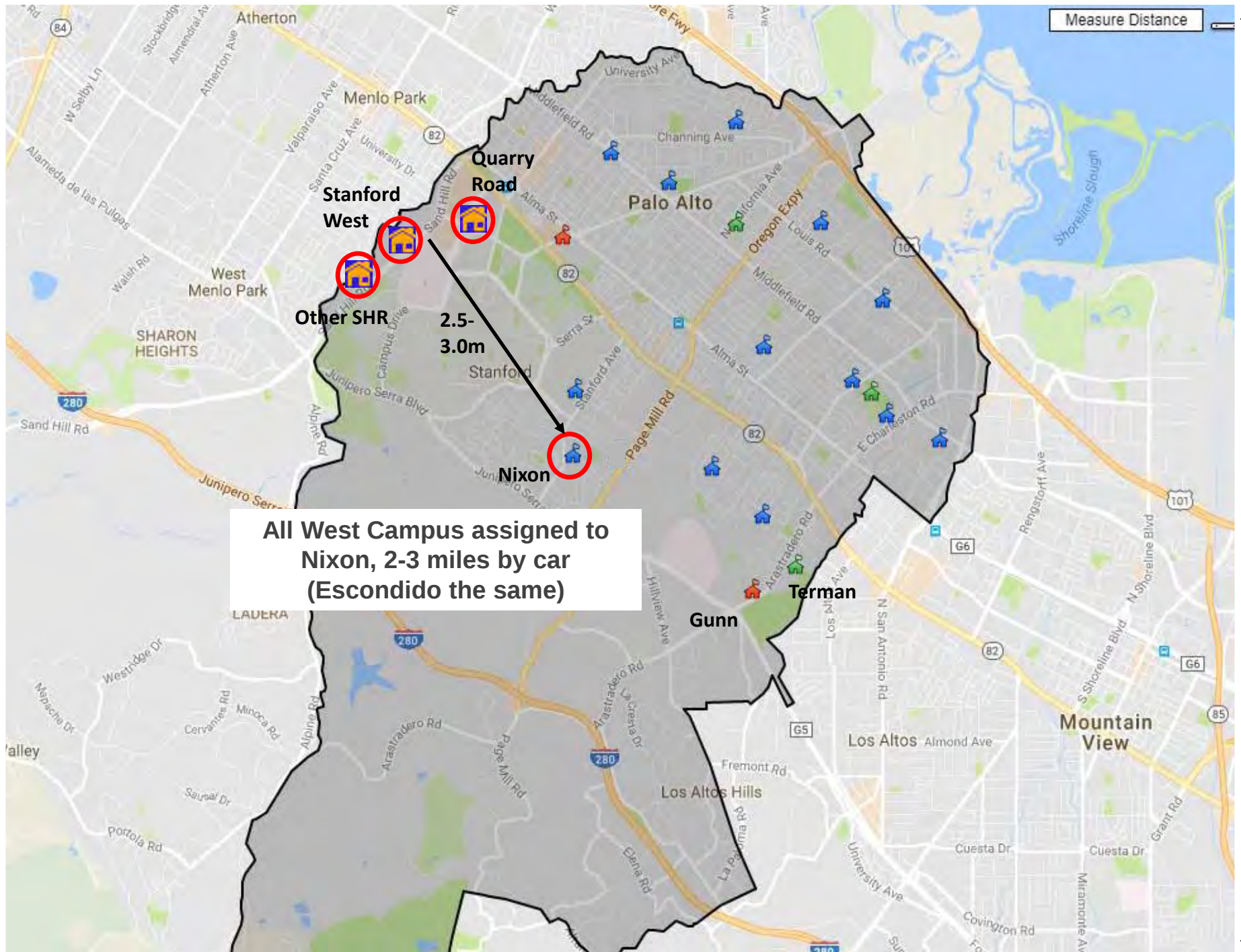
- Up to 550 Units
- TBD BRs
- Students: TBD

Total West Campus

- Units: $730 + 550 = 1280$
- Students: $300 + \text{TBD}$
- Elementary: $210 (70\%) + \text{TBD}$
- $550 * 0.5 = 275 * 70\% =$
 $193 + 210 = 403$ students









- The GUP / EIR – getting the analysis right

- **What's important – creating a neighborhood school for an emerging neighborhood**

Aside from the GUP and the "planning process," the case is pretty strong that we (Stanford and PAUSD) will want an elementary school on the west side to serve the children who will live there for the next 50 to 100 years, just as we have Escondido to serve grad student families and Nixon to serve faculty and administrator families on the east side.

There are certainly other ways to serve those students, and if we have to we will, but if we have a chance to serve an emerging neighborhood with a traditional neighborhood school, why not? It's what our predecessors have done before, and it's clear why - it's good for our community and our kids. But just as with Escondido and Nixon, Stanford owns all the land, so we can only provide the school if they let us.

- What's concerning – cumulative impact of potential housing vs. school site capacity

6
cont.



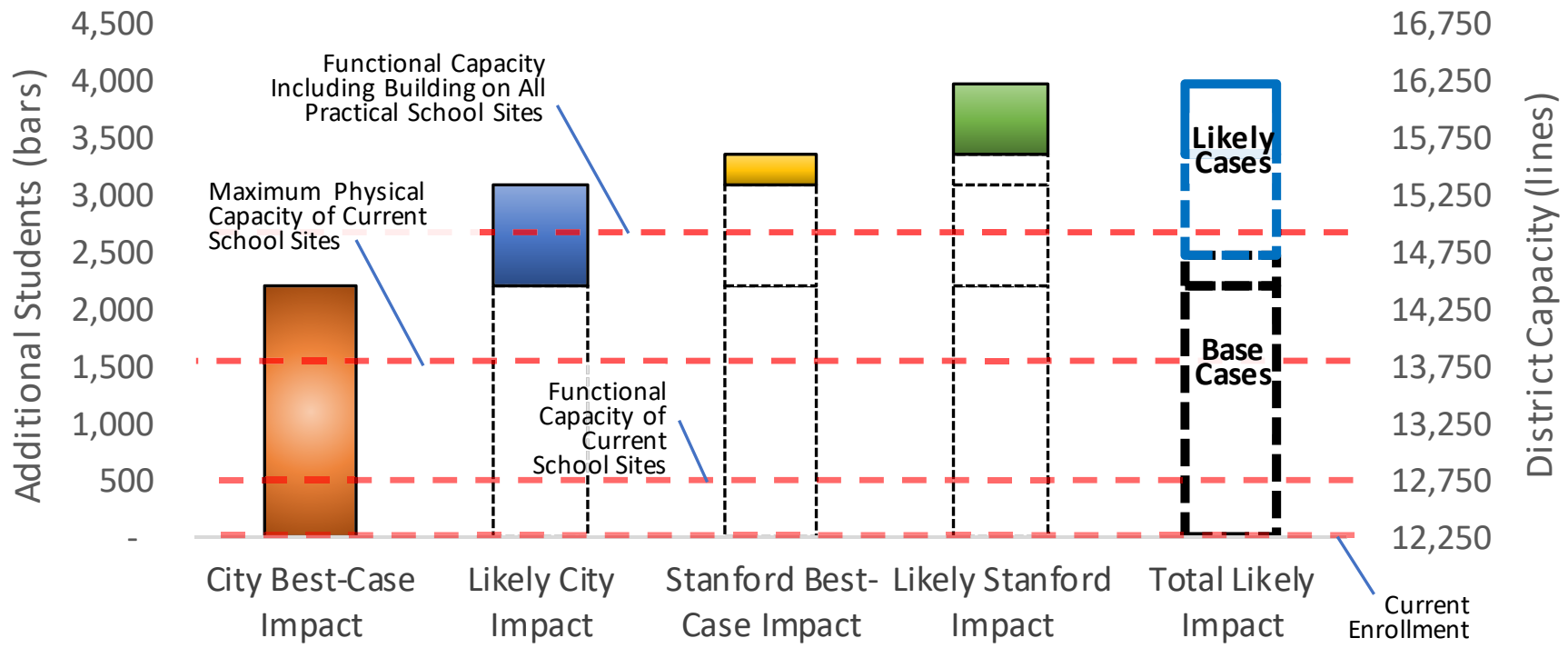
- The GUP / EIR – getting the analysis right
- What's important – creating a neighborhood school for an emerging neighborhood
- **What's concerning – cumulative impact of potential housing vs. school site capacity**
 - Cumulative impact of GUP and City Comp Plan
 - Available capacity – schools and school sites
 - Densifying – what it might look like
 - The Challenge - securing new school sites

7



Cumulative Impact of Potential Housing vs. School Site Capacity

- If the City Comp Plan and the GUP “come true,” PAUSD will either need additional school sites or be forced to “densify” our schools, as others are starting to do



7
cont.



- **Los Altos K-8 – 5150 El Camino Real Proposal (2016)**
 - Purchase 3.8 acre site on El Camino Real in Los Altos for \$40 million
 - “The strategy involves razing the current office building complex and **building a new 100,000-square-foot urban campus** in its place. **Parking would be underground, buildings would be three- and four-stories high, and the site would include blacktop playground and field space.**”
 - **Project withdrawn in November 2016 because of cost and community resistance to design and location**
- **Mountain View Whisman – North of Bayshore Plan (2017)**
 - “The old way of looking at developing school campuses probably won’t work anymore. ‘Schools are going to have to go up,’ said [Superintendent] Rudolph. The old way would be to put a campus on seven-acre plots. The [thought is that new schools will need ‘smaller footprints.’ **A two-story, more compact ... ‘urban-style school,’ with apartments over its instructional ... spaces.**”
- **If traditional school sites are not available, the alternatives are “urban-style” schools or increased enrollment across existing school sites, with larger schools and/or larger classes**

7
cont.



- The GUP / EIR – getting the analysis right
 - What’s important – creating a neighborhood school for an emerging neighborhood
- **What’s concerning – cumulative impact of potential housing vs. school site capacity**
 - If the City Comp Plan and the GUP “come true,” PAUSD will either need additional school sites or be forced to “densify” our schools, as others are starting to do
 - New school sites require planning and coordination with those who control land and land-use: the City, Stanford, and developers

7
cont.

5.2.1.11 Responses to Comments from Palo Alto Unified School District

A-PAUSD2-1 Please see Response to Comment A-PAUSD2-2 through A-PAUSD2-7 below.

A-PAUSD2-2 With respect to student generation rates and enrollment forecasts, please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts. With respect to growth, please see Response to Comment A-PAUSD1-4.

A-PAUSD2-3 The existing Stanford Vi housing is located in Palo Alto (as discussed in the Draft EIR page 5.12-3), outside the Stanford General Use Permit boundary, and therefore was not associated with the 2000 General Use Permit or the proposed 2018 General Use Permit.

It is not clear what 2,900 new graduate student housing units the comment is referring to. As discussed in the Draft EIR, the Escondido Village Graduate Residences project was authorized under the existing 2000 General Use Permit, (and consequently is not associated with the proposed 2018 General Use Permit), and consists of a net addition of 2,020 student beds (page 5.12-15). Under the proposed 2018 General Use Permit, 3,150 net new housing units/beds would be developed on campus, of which up to 550 units would be available for faculty, staff, postdoctoral scholars, and medical residents (page 3-18).

The housing development proposed under the 2018 General Use Permit is intended primarily to accommodate future Stanford students, faculty and families, not necessarily to redirect existing residents onto the campus.

The claim that new on-campus housing constructed under the proposed 2018 General Use Permit would create a displacement effect, where students and/or faculty from existing housing in the PAUSD district boundary would relocate to the new on-campus housing, and free up existing housing for potential use by families is speculative and not substantiated with any quantifiable evidence. See also Impact 3.15-7 which addresses cumulative impacts to public schools. No changes to the EIR are required.

A-PAUSD2-4 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.

A-PAUSD2-5 Please see Response to Comment A-PAUSD1-4.

A-PAUSD2-6 Please see Please see Master Response 12: Public Schools, Topic 2, Additional School Site.

A-PAUSD2-7 Cumulative impacts related to public schools were addressed in Impact 5.13-7 in the Draft EIR. Impact 5.13-7 explained that at the time of preparation of the Draft EIR, that the City of Palo Alto was still undergoing environmental review for an update to its Comprehensive Plan, and that some of the future growth scenarios would result in PAUSD student enrollment exceeding existing PAUSD capacity for its elementary, middle, and/or high schools.

The City of Palo Alto adopted the update to its Comprehensive Plan on November 13, 2017. The selection of the preferred scenario by the City would result in 3,545 to 4,420 new housing units in the City that was estimated to generate between 1,773 and 3,632 new students. The Final EIR for the update to the City's Comprehensive Plan determined that this range of anticipated student growth would result in an exceedance of existing PAUSD capacity for its elementary, middle and high schools. The PAUSD is responsible for updating its enrollment forecasts as needed, including any increases that would be associated with growth under the City's Comprehensive Plan. As with the proposed Project, all other cumulative projects within the PAUSD service area would also be subject to the school development fees.

It is unknown where or how school facilities would be expanded to accommodate future students. It would therefore be speculative to analyze the impacts of potential future school construction projects in this EIR.

Please also see Master Response 12: Public Schools, Topic 2: Additional School Site, in this Response to Comments Document, that discusses multiple options PAUSD may explore before building a new school. Further, if it is determined that additional school facilities are needed as growth occurs, expansion and/or construction would be subject to separate environmental review, thereby providing an opportunity to identify and mitigate associated environmental impacts.

TOWN of PORTOLA VALLEY

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December 14, 2017

David Rader
Santa Clara County Planning Office, County Government Center
70 W. Hedding Street, 7th Floor, East Wing,
San Jose, CA 95110
david.rader@pln.sccgov.org.
Fax: (408) 288-91 98

Re: Comments on DEIR for Stanford University's 2018 GUP

Dear Mr. Rader:

Thank you for the opportunity to respond to the Draft Environmental Impact Report for Stanford University's 2018 General Use Permit (DEIR). In light of the County of Santa Clara's recent extension of the comment period, the full Town Council has had an opportunity to discuss the DEIR and this letter is being sent on behalf of the Town of Portola Valley. The Town's comments focus on the housing issues discussed in the DEIR.

Background

We understand that Stanford University seeks to develop 2,275,000 SF net new academic and academic support space (and build out the remaining square footage in the 2000 GUP)¹ and add 3,150 net new housing units/beds of which up to 550 units would be available for faculty, staff, postdoctoral scholars and medical residents. The application for development is wholly within Academic Growth Boundary (AGB), central campus, located in Santa Clara County. By 2035 full buildout the project is expected to increase the regional population by 9,610 people—this is two times the total population of the Town of Portola Valley.

1

Carryover of 2000 GUP Housing Strategies

As a preliminary matter, we support the Housing Linkage policy codified as Condition F.8 of the 2000 General Use Permit requiring that Stanford's development of academic and academic support space be linked to the development of its housing units. We think this linkage program has worked well to ensure housing construction keeps pace with academic development and we are pleased to see this program carried forward in the 2017 GUP. We encourage the County to look closely at the existing triggers and update them to reflect the current housing crisis.

2

Likewise, we support the affordable housing program codified as Condition F.6 of the 2000 General Use Permit requiring that for each 11,763 square feet of academic development constructed, Stanford shall either: 1) provide one affordable housing unit on the Stanford campus, or 2) make an appropriate cash

¹ We assume this 2000 GUP build out will be subject to Conditions F.6 and F.8 regarding housing linkage and affordable housing fund requirements.

payment in-lieu of providing the housing unit. We encourage the County to look closely at the in lieu fee and set it at an initial rate that reflects the current market conditions. Also, as discussed in more detail below, while we acknowledge that some of the funding should be prioritized towards transit proximate development, we also encourage the County to retain the six-mile radius policy in order to fund more projects.

2
cont.

Comments on Population and Housing Section

1. *Jobs/housing imbalance:* While the DEIR recognizes the current job/housing imbalance, its current prominence in Plan Bay Area 2040 and the associated environmental impacts, the DEIR falls short of analyzing the project's impact on this imbalance. Over twenty years ago the Santa Clara County General Plan recognized that employment and economic growth in the County was greatly outpacing the housing supply, and the housing that was being constructed at greater distances from major employment centers in the County.

The DEIR also recognizes that the "principal effects of this imbalance are known to include: increased travel and commute distances; increased traffic congestion; increased automobile dependency; increased housing affordability problems, especially in "job-rich" cities; increased automobile emissions, including greenhouse gas emissions, affecting air quality and contributing to global climate change; increased noise; and overburdened urban services and facilities."

3

Since 1980 all other Bay Area counties have added more jobs per added housing unit than was their situation in 1980, thus exacerbating this imbalance. This is due to not just robust job growth in these Counties but to a dramatic slowdown in housing production there relative to earlier decades, particularly in San Mateo county, Santa Clara county, and other inner East Bay communities. The existing housing stock is also increasingly housing higher wage earners as the regional economy shifts toward higher wage jobs and actual housing production lags growth in demand.

The Stanford University Medical Center 2012 EIR looked at this imbalance and we think it would be productive to have a similar analysis here.

2. *Population Projections:*

A. Stanford's off-campus housing demand projection throughout the region is a critical component of the population and housing analysis. Given the role of Stanford as a nationally recognized research institution with plans to increase the faculty during the project period, the accuracy of Stanford's projections of graduate student and postdoctoral population cohorts that will affect the demand for off campus housing should be further analyzed and discussed.

4

B. The population projections in Tables 5.12.7 and 5.12.8 do not appear to include service workers associated with the population increase. As population increases, the demand for services also increases. For instance, it is likely that faculty members moving into single family homes will hire gardeners, housekeepers, nannies and other service workers. As the sharing economy grows, it is also likely that car drivers and delivery people will also increase. This increase in service workers, particularly low income workers, should also be included in the projections.

5

C. Please include a total population chart for off-site affiliated housing. The DEIR includes a table showing increased population related to graduate students and faculty/staff (i.e. spouses, children and other family members), but the off site housing section does not. Accordingly, the offsite housing population numbers appear to be under-estimated.

6

3. *Displacement of Existing Residents:* The DEIR states “Existing housing on the campus may be demolished over the course of implementation of the 2018 General Use Permit; however, any demolished housing units would be added to the inventory of new housing units authorized for construction. Therefore, the Project would not displace substantial numbers of existing housing.” (P.5.12.14.) Please clarify whether Stanford intends to demolish any existing on or off site housing units and if so clarify where the occupants will be temporarily housed during construction. As we have seen with the devastating fires in Sonoma, Napa and Mendocino Counties, temporary housing demand can have a significant impact on a local community’s existing housing stock, especially its affordable rental stock.

7

4. *Analysis of Faculty Housing Demand:* The DEIR states that there will be a net reduction of 102 faculty households. (P. 5.12.17.) With the DEIR projecting 789 net new faculty members and the project proposing to build 550 faculty/staff/medical student units, please explain how there is a net reduction of needed units.

8

5. *Methodology for Assuming Off Site Housing Demand Is Met*

A. The DEIR states the estimated distribution of off site housing demand is based on data from Stanford’s 2016 Commute Survey (p. 5.12.17). Given the current housing crisis in the Bay area, it is unreasonable to assume that all population sectors, particularly low income wage earners, will continue to live in nearby communities where housing prices have shot up and vacancy rates remain low.

9

B. The DEIR concludes there is no impact on population and housing because the housing increases within each of these jurisdictions would represent a small fraction of the household growth projected for each jurisdiction by ABAG for the 2015-2040 timeframe. (P.5.12.18). There are two problems with this conclusion. First, the ABAG population projections and the RHNA housing allocations based on those populations, are only directory. ABAG does not mandate the construction of housing and thus the ABAG projections are not an accurate proxy for whether the housing demand will in fact be accommodated. Second, the current housing crisis has made it clear that jobs production has well out paced housing production. The overall area is not only experiencing significant housing deficits right now, but such deficits are projected to continue well into the future. Given this current housing situation, the DEIR should conduct a more thorough analysis to determine whether off-site housing allocated to a particular jurisdiction will in fact be built and be available to Stanford’s population demand. Data about existing off-site leases or Stanford owned land that could be developed into housing would be useful to this analysis.

10

6. *Impact on Town of Portola Valley:* The draft EIR indicates that the 2018 GUP is anticipated to result in only one more unit in Portola Valley (indirect growth) (P. 5.12.19). This appears to significantly underestimate housing demand in Portola Valley which is directly adjacent to Stanford.

11

Additional Recommendations

1. To more fully address the project's housing impacts, we recommend that the County review the housing linkage triggers to ensure that the amount of on site housing is maximized and constructed prior to academic build out. Likewise, we request the County to examine the amount of the affordable housing linkage to ensure that it adequately accounts for the project's affordable housing demand and that the in lieu fee reflects the current and future housing market. 12
2. We also request the County to consider allocating a portion of its affordable housing fund to jurisdictions that do not meet the ½ mile transit proximate criteria. In addition, we encourage expanded use of these funds to support construction of accessory dwelling units. Stanford students are likely renters of such ADU's. In particular, the Town Council of Portola Valley has recently been discussing strategies for addressing the community's housing challenges. While the cost of land and estate zoning poses challenges, we believe an expanded accessory dwelling unit program is viable as is Town-constructed workforce housing. We look forward to partnering with the County/Stanford on these and other housing programs. Portola Valley's close proximity to the Stanford project would also assist in reducing commute traffic and might even reduce the impacts to the 280 Freeway/Alpine LOS F intersection identified in the DEIR. To this end, we encourage the County and Stanford to examine extending the Marguerite shuttle and/or other commute bus into Portola Valley during commute hours and partnering with Portola Valley on Zipcar and commuter bicycle programs. 13
3. We encourage Stanford to facilitate Santa Clara County working with San Mateo County in developing and improving current bicycle and pedestrian pathways throughout Stanford lands and adjacent communities. We strongly support the existing pathways Stanford has created throughout campus and urge Stanford to continue its efforts to encourage students, faculty and staff to convert more off-campus vehicle trips to bicycle or pedestrian trips. 14
4. Finally, as a community which values its open space and rural character, we encourage the County to require a permanent conservation easement over the foothills in return for the development in the flatlands. Clustering development and offsetting the intensity of development with permanent protection of the adjacent hills is a planning tool used by most nearby local agencies and the County itself. Stanford's growth at this point is basically unrestricted. As Supervisor Simitian has pointed out, Stanford's ultimate buildout must be known so that every 15 years or so, Stanford does not request another 3 million square feet of development. The 2000 GUP required preparation of a holding capacity analysis intended to set the maximum buildout limits for the Stanford lands, with particular attention to the foothills. This analysis was not completed. It should not only be completed, but also analyzed in the EIR. Furthermore, the holding capacity should be analyzed for each campus area, so that there is assurance that the foothills will remain protected. (Please also see comment letter from Sandy Sloan dated November 21, 2017 which is attached and incorporated.) 15

Honorable Susan I. Etezadi
August 13, 2015 – Page 5

Thank you for your consideration of these concerns. We would appreciate any opportunity to discuss these issues with you and would appreciate a response.

Sincerely,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke at the end.

Mayor, Portola Valley

Enclosure

5.2.1.12 Responses to Comments from Town of Portola Valley

A-PV-1 The comment is acknowledged; no response is required.

A-PV-2 The comments are acknowledged; no response is required.

A-PV-3 A jobs/housing ratio can be calculated in a number of ways, and it also depends upon the geographic area used for the calculation. For example, a city may calculate its jobs/housing ratio by comparing the number of jobs within the city to the number of employed residents living within the city. A jobs/housing imbalance may be perceived as good or bad depending upon the perspective of the person looking the data. A job-rich community often receives significant revenue from locally generated sales and property taxes, whereas a housing-rich community may benefit from a strong sense of community but may require public services with costs that outpace revenue generated by sales and property taxes. In some regions, individual cities may be job-rich or housing-rich, but the region as a whole may be more balanced. Some housing advocates favor construction of new housing along transit corridors, rather than focusing on a balance in an individual jurisdiction.

The CEQA Guidelines state that an EIR's discussion of growth-inducing effects should not assume that growth is necessarily beneficial, detrimental, or of little significance to the environment. (CEQA Guidelines section 15126.2(d).) Here, the Draft EIR complies with CEQA by including data on employment expected to be generated by the proposed Project and estimating the number of new residential units that would be needed to provide housing for them.

The Draft EIR analyzes the physical effects of growth by quantifying vehicle trips, air pollutant emissions, noise, and other impacts associated with Stanford's population growth. For example, the number of off-campus workers generated by the proposed Project is reflected in the Draft EIR's calculation of the number of vehicle trips that could be generated if Stanford is unable to achieve the no net new commute trips standard. The trip generation rates presented in the Draft EIR reflect data indicating that many off-campus Stanford workers take Caltrain or use other alternatives to single-occupant vehicles to travel to and from campus. Therefore, the jobs/housing ratio does not directly correlate to traffic congestion. The EIR's transportation analysis shows that an employment center such as Stanford that is located adjacent to a Caltrain station, is well-served by public transit, and provides incentives to move workers out of their cars, results in fewer vehicle trips per off-campus worker than regional averages. Nevertheless, the Draft EIR shows that the Project would contribute to significant intersection and freeway congestion impacts if Stanford does not achieve the no net new commute trips standard. The EIR also shows that on-campus housing generates vehicle trips; an on-campus faculty staff housing unit generates more vehicle trips than a commuter traveling to Stanford from off-campus. The Draft EIR calculates the

impacts of all vehicle trips associated with campus jobs and housing, including associated air pollutant and greenhouse gas emissions and traffic noise.

Please note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which included a new significant Project impact (Impact 5.17-1: Environmental Consequences of Stanford Providing Off-campus Housing Under Proposed Project) was identified in the Recirculated Portions of Draft EIR.

The Recirculated Portions of Draft EIR also includes two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of on-campus housing would be added to the proposed Project. The analysis of Additional Housing Alternative A and Additional Housing Alternative B, along with comments received on, and responses to, the Draft EIR and Recirculated Portions of Draft EIR, will be presented to the County Board of Supervisors to assist in their consideration of whether more housing should be constructed on the Stanford campus.

Finally, a jobs/housing ratio typically is calculated on a citywide or regional basis; therefore, it is unusual for a city/county to look at a project in connection with its city/county-wide jobs/housing ratio. A jobs/housing ratio is not typically applied to a single institution or private business.

- A-PV-4 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 1: Stanford's Growth Rates.
- A-PV-5 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 2: Clarification Regarding "Other Workers," and Topic 6: Job Multiplier.
- A-PV-6 The net increase in off-campus population is listed in the Draft EIR Appendix PHD, in Table 12.
- A-PV-7 The Draft EIR determined on page 5.12-14 that displacement of substantial numbers of existing housing and numbers of people would not occur because the Project is adding housing, not demolishing a net amount of housing. In the short term, it is possible that some amount of on-campus housing may need to be closed while Stanford is providing additional housing on the same site or elsewhere. This is an existing condition under the 2000 General Use Permit, and this condition would not be expected to worsen under the proposed 2018 General Use Permit. The growth rates under both permits are similar to one another, and the location of that growth is similar. Any impacts of the planned temporary closure of some housing units while net additional housing is constructed are incomparable to the effects of recent wildfires that destroyed hundreds of housing units.

- A-PV-8 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 3: Off-Campus Households and Household Adjustment Factors.
- A-PV-9 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 4: Use of Stanford Commute Survey.
- A-PV-10 Section 5.12, Population and Housing, of the Draft EIR shows that the growth in Stanford student, faculty, staff, and other workers households living outside the academic campus would be distributed among jurisdictions in the Bay Area. Table 5.12-11 shows that the housing increases within each jurisdiction would represent a small fraction of the household growth projected for each jurisdiction by ABAG for the 2015-2040 timeframe.
- Also, please note that impacts of the Project on housing supply is a socioeconomic issue not required to be analyzed in the Draft EIR. Nevertheless, the Recirculated Portions of the Draft EIR do discuss the indirect impacts of off-campus housing associated with the Project (Impact 5.17-1), and analyze the impacts of two new alternatives that provide additional housing on campus.
- A-PV-11 The projection reflects the low number of existing Stanford affiliates who currently reside in Portola Valley.
- A-PV-12 Population and Housing impacts are discussed in Section 5.12 of the Draft EIR. Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing and Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- A-PV-13 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund, and Topic 5: Geographical Distribution of Affordable Housing Funds. The request for expanded use of affordable housing funds to support construction of accessory dwelling units is acknowledged and will also be considered by the Board.
- A-PV-14 As part of the proposed Project, Stanford has proposed to fund four sets of bicycle facility infrastructure projects in surrounding jurisdictions. Please see Chapter 8, Special Considerations, of the Draft EIR.
- A-PV-15 The comments regarding preserving the foothills are acknowledged, are part of the public record on the Project, and will be considered by the County decision-makers. Please see Master Response 1: Non-CEQA Comments; Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis; and Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study.



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

December 5, 2017

David Rader
Santa Clara County
70 W. Hedding Street
7th Floor, East Wing
San Jose, CA 95112

Subject: Stanford University 2018 General Use Permit
SCH#: 2017012022

Dear David Rader:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on December 4, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1

2017 DEC -7 PM 3:53
COUNTY OF SANTA CLARA

**Document Details Report
State Clearinghouse Data Base**

Comment Letter A-SC

SCH# 2017012022
Project Title Stanford University 2018 General Use Permit
Lead Agency Santa Clara County

Type EIR Draft EIR
Description Note: Review Per Lead

Stanford University has applied for a new general use permit governing development on its lands in unincorporated Santa Clara County. The proposed General use permit would authorize an additional increment of campus growth and land use development, including 2,275,000 net new sf of net new academic and academic support facilities, and 3,150 new housing units/beds, anticipated to take place over a period that would extend from approx 2018-2035. The proposed general use permit would apply only to those Stanford lands that are located within unincorporated Santa Clara County, and thus, are subject to the land use jurisdiction and regulatory authority of the county of Santa Clara. Stanford seeks county approval of the proposed general use permit and related amendments to the Stanford Community Plan and County Zoning Map.

New building square footage and housing, as well as most infrastructures subject to the proposed 2018 general use permit would be constructed on vacant land, infill sites and redevelopment sites within Stanford's Academic Growth Boundary. As occurred under the 2000 general use permit, some infrastructure improvements such as underground pipelines, electrical transmission lines, water supply improvements, and habitat improvements could occur outside the Academic Growth Boundary.

Lead Agency Contact

Name	David Rader		
Agency	Santa Clara County		
Phone	(408) 299-5779	Fax	
email			
Address	70 W. Hedding Street 7th Floor, East Wing		
City	San Jose	State CA	Zip 95112

Project Location

County	Santa Clara
City	
Region	
Lat / Long	
Cross Streets	Palm Dr and El Camino Real
Parcel No.	
Township	

Range

Section

Base

Proximity to:

Highways	SR 82, I-280
Airports	
Railways	UPRR, Caltrain
Waterways	San Francisquito, Matadero, Los Trancos, and Deer Creeks
Schools	Palo Alto HS, Escondido School, Lucille M. Nixon School
Land Use	Academic campus, campus residential; campus open space, open space and field research, and special conservation areas; Z: General use; low density res, medium density campus residential, open space and field research; and general use

Comment Letter A-SC

Document Details Report
State Clearinghouse Data Base

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil Erosion/Compaction/Grading; Solid Waste; Traffic/Circulation; Water Quality; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual; Agricultural Land; Drainage/Absorption; Economics/Jobs; Forest Land/Fire Hazard; Minerals; Sewer Capacity; Toxic/Hazardous; Vegetation; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; San Francisco Bay Conservation and Development Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 4; California Department of Education; Department of Housing and Community Development; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received	10/06/2017	Start of Review	10/06/2017	End of Review	12/04/2017
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5.2.1.13 Responses to Comments from State Clearinghouse and Planning Unit

A-SC-1 The comment notes compliance with the State Clearinghouse requirements for draft environmental documents, pursuant to CEQA. The comment also notes that during the State Clearinghouse’s public review period, no state agencies submitted comments.

The comments are acknowledged; no response is required.



February 2, 2018

County of Santa Clara
Department of Planning and Development
70 W. Hedding Street
San Jose, CA 95110

Attention: David Radar

Subject: Draft Environmental Impact Report Stanford University 2018 General Use Permit

Dear Mr. Radar:

Land Use and Transportation

VTA supports the intensification of Stanford development within the campus core; focusing growth in the center of campus and east campus allows for the conservation and protection of open spaces and improves transit efficiencies.

VTA commends Stanford for pursuing the goal of No Net New Commute Trips, established by the 2000 Community Plan and General Use Permit (GUP). Stanford's existing 50% drive-alone mode share is well below area standards (2018 GUP application p. 4.35). Retaining this goal relies upon utilization of the existing transportation network within campus to maximize the number of trips taken by transit, bicycling and walking.

DEIR Transportation Mitigation

VTA strongly supports the following elements of DEIR Mitigation Measure 5.15-1 designed to address construction impacts to transportation:

- Protection and Maintenance of Public Transit Access and Route
- Maintenance of Pedestrian Access
- Maintenance of Bicycle Access

VTA recommends that the DEIR reference VTA's recently approved Bus Stop Relocation Policy in Measure 5.15-1 to clearly state, "without prior approval from the VTA or other appropriate jurisdiction. Such approval shall require submittal and advance coordination per VTA's Bus Stop Relocation Policy to reduce transit impacts..."

Transportation Demand Management and Access to Transit

As noted in our December 16, 2016 comment letter, the intended use of the 40,000 net new square feet of "other space" authorized by the 2000 GUP is unclear. The DEIR describes two potential developments, a child care center or transit hub, both could yield fewer solo-vehicle trips. VTA supports refining the transit hub concept on campus, which could provide connections between the Marguerite Shuttles and future potential transit providers. VTA requests further detail about where such a transit hub would be located on campus, and how it might support or complement the existing Palo Alto Transit Center.

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The No Net New Commute Trips goal, monitoring approach and enforcement structure is consistent with the 'Target-Based Trip Reduction Approach' outlined in the 2014 VTA Transportation Impact Analysis Guidelines, which is part of the Congestion Management Program for Santa Clara County maintained by VTA. However, in an effort to further reduce new trips to the Stanford Campus VTA recommends that Stanford perform the following:

- Participate and fund a transit planning study to extend VTA's Rapid 522/or Route 22 into campus. These trips could directly qualify for trip credits, "as long as the improvement would enhance safety or increase mobility for pedestrians bicycles or transit users within the local impact area," per Section 8.1.1.4 (Vol 3, PDF pg. 257).
- Expand transit fare incentives to Stanford contractors, consultants, 3rd party workers and part-time employees.
- Improve all transit bus stops served by VTA in the vicinity of the campus to meet ADA accessibility standards and VTA standards described in the VTA Transportation Passenger Environment Plan (May 2016) <http://www.vta.org/projects-and-programs/planning/transit-passenger-environment-plan>
- Identify fair share contributions and fund future improvements of Palo Alto Caltrain Station to support Caltrain electrification and modernization.
- Fund Caltrain EMU fleet expansion to improve transit rider capacity.

4

VTA recommends that the County consider these recommendations when assessing the No Net New Commute Trips proposed trip reduction criteria in the 2018 Stanford GUP, outlined in Section 3.83 and 8.1.1.4. VTA notes that several of these recommendations represent "the funding of off-campus circulation infrastructure improvements." (Vol. 1, PDF pg. 99). These recommendations could be considered in place of traffic impact and intersection impact mitigations in the event Stanford does not meet the No Net New Commute Trips criteria.

This set of off-setting multi modal improvements would help offset vehicular impacts, and should include an implementation plan with specific responsibilities and a delivery schedule. Similar to a Multimodal Improvement Plan prepared for Congestion Management Program purposes, these improvements can include additional transit, bicycle and/or pedestrian facilities.

VTA supports upgrading all Marguerite Shuttles to electric buses by 2035 (Vol 1, PDF pg. 95). As Stanford further refines its needs to upgrade its fleet from diesel hybrid to electric, VTA believes there is an immense opportunity to enable a facility that can be used by multiple operators (Stanford, SamTrans, AC Transit and VTA. We expect electric buses to become a more significant part of our fleet in the future. Stanford and the Palo Alto Transit Center, as an end of the line station, could be a place where operators share a facility. As VTA plans progress, VTA will provide information on what space or facilities could be used in an improved transit facility to accommodate an electric fleet. VTA encourages the County to condition Stanford to site its future electric charging facility in a location amenable to other transit operators in the campus area, such as the Palo Alto Transit Center, along El Camino Real, or at the potential future Transit Hub (referenced above). VTA recommends identifying and studying several alternative locations in the Final DEIR.

5

It should be noted that VTA plans to discontinue Route 35 in the Stanford vicinity and replace it with Route 21 per VTA's Board approved 2018 service plan. Changes to Route 89 will also occur in the immediate vicinity. Figure 4.2 (Vol 3, PDF pg. 342) correctly depicts current VTA services but do not note future changes to the system. Please reference <http://nextnetwork.vta.org/> for future changes. These changes are expected to go into effect in 2018 when BART service opens to Santa Clara County. VTA recommends correcting this in the Final DEIR in anticipation of the proposed service changes.

6

Transportation Demand Management Monitoring

Section 3.8.2 of the Stanford 2018 GUP DEIR notes that "Stanford proposes to update the monitoring methodology so that monitoring can be conducted through automated means" and "Stanford also requests that a County approval process be established for the replacement of monitoring equipment with new technologies as they become available". VTA continues to support the use of new technologies for TDM monitoring, as they offer the opportunity to provide a more robust data set on travel patterns at different times of day, days of the week, and periods of the year. VTA suggests that the County consider including a condition with the GUP for Stanford to offer technical assistance and knowledge-sharing on its monitoring methodology and technology, to assist nearby communities in Santa Clara and San Mateo Counties in similar target-based trip reduction efforts.

7

VTA requests further clarification to the second amendment of the Trip Credit Policy per Section 3.8.2 that states, "if the No Net New Commute Trips standard cannot be achieved through trip reduction measures and trip credits alone, optionally achieve the No Net New Commute Trips standard by funding trip reduction programs (instead of funding intersection improvements, as is done currently) implemented by other entities in the vicinity, including programs that encourage and improve use of alternative transportation modes, and/or improve safety and mobility for pedestrians, bicyclists and transit users." VTA recommends that a list of trip reduction programs be provided in the FEIR for public review and suggests the County require Stanford to study the nexus between funding improvements and intersection and freeway impacts identified in the Stanford GUP DEIR per Section 5.15.5. VTA also supports the idea of funding educational programming, contributions to a TMA or programs that directly seek to reduce trips in the Stanford vicinity.

8

SB 743 VMT Analysis

VTA commends Stanford for performing a thorough analysis of Vehicle-Miles-Traveled (VMT) effects of the proposed 2018 GUP, in light of Senate Bill (SB) 743 and the upcoming transition from congestion-based measures to VMT-based analysis in CEQA. VTA also commends the County and its consultant team for performing an independent peer review of the draft SB 743 VMT report. The resulting report, in Appendix VMT, appears to be very thorough and well-documented. VTA staff appreciates the attention that was paid to explaining how the VMT analysis for the Stanford 2018 GUP responds to the draft SB 743 guidelines from the Governor's Office of Planning and Research (for instance, pages 2 through 15 and 20 through 23); where the analysis used Stanford-specific data versus data from the VTA or regional travel demand

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February 2, 2018
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models; and where the analysis had to make assumptions for situations not addressed in OPR's draft SB 743 guidelines (for instance, including college student trips in the assessment of Worker VMT).

9
cont.

VTA notes that Proposed New Section 15064.3 of the CEQA Guidelines (from OPR's January 2016 revised proposal) states that "A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project." (OPR, January 2016, page II:8). VTA believes that this SB 743 VMT Analysis, prepared by Stanford and peer-reviewed by the County, effectively addresses OPR's guidelines in this regard.

10

VTA notes that while the analysis in Appendix VMT indicates that there would be no significant environmental impacts related to VMT per OPR's January 2016 draft guidelines, VTA still believes it is important for Stanford and the County to extend and reinforce the No Net New Trips framework of the 2000 GUP. Doing so will help minimize VMT, greenhouse gas emissions and localized negative transportation effects from the Stanford 2018 GUP to the greatest extent possible.

11

Housing

Stanford is proposing to increase contributions to the County-administered Stanford Affordable Housing Fund. VTA supports the development of new affordable housing located near transit because it addresses several objectives, including expanded travel options for communities, reduced single-occupancy vehicle trips and reduced Vehicles-Miles-Traveled (VMT). The VTA Board recently approved the 2018 service plan featuring higher frequency bus routes. Further details of the final service plan can be found at <http://nextnetwork.vta.org/>. VTA encourages Stanford, cities, the County, developers and institutions to use it as a guide to make investments along high-frequency routes in Santa Clara County.

12

Bicycle, Pedestrian and Trail Accommodations

VTA supports Stanford's commitment to contribute to the funding of four specific off-site bicycle improvements, including the Hanover Street/Bol Park improvements. (Volume 2, Chapter 8) This project is included in the draft updated Countywide Bicycle Plan (2017).

13

VTA appreciates that the GUP references VTA's Bicycle Expenditure Program (Volume 2, page 5.15-47) and lists BEP projects near the Stanford Campus. In addition to being part of the 2013 BEP, the projects (with exception of Sand Hill Road, which is not in Santa Clara County) are all included in the draft updated Countywide Bicycle Plan (2017). We recommend that Stanford add BEP project 118, Adobe Creek Reach Trail: West Bayshore Road to Louis Road, to the list of BEP projects near campus. This project leads to the Adobe Creek Overcrossing.

14

VTA recommends that Stanford contribute funding to nearby BEP projects, either as voluntary offsite contributions, or as mitigation measures if Stanford cannot meet its No Net New commute trips standard. VTA periodically updates the BEP, and is considering replacing it with a

15

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combined Bicycle and Pedestrian Capital Project Priority List. VTA recommends any reference to the BEP also include future updates and modifications to the BEP.

↑ 15
cont.

VTA supports Stanford's proposal to use the Bicycle StreetScore+ Analysis for quality of Service Analysis of bicycle and pedestrian conditions for VTA's Transportation Impact Analysis, as described in Volume 2, page 5.15-60 and 5.15-61.

16

Thank you for the opportunities to review this project. We look forward to the Final EIR and response to comments. If you have any questions please call Roy Molseed at (408) 321-5784.

Sincerely,



Scott Haywood
Transportation Planning Manager

cc: Patricia Maurice, Caltrans
Brian Ashurst, Caltrans

CO1601

5.2.1.14 Responses to Comments from Santa Clara Valley Transportation Authority

- A-SCVTA-1 The comment is acknowledged; no response is required.
- A-SCVTA-2 Please see Chapter 2 in this Response to Comments Document for additional text under the *Protection and Maintenance of Public Transit Access and Routes* component of Mitigation Measure 5.15-1.
- A-SCVTA-3 The specific locations and designs of transit hubs on campus are not yet known. As future planning around transit hubs occurs, Stanford will include stakeholders, including the VTA, in discussions.
- A-SCVTA-4 Stanford states that it will explore expansion of VTA’s Rapid 522 and Route 22 into campus as part of its future expanded transportation demand management programs under the proposed 2018 General Use Permit.

The comment also suggests that transit fare incentives, improvements to bus stops in the vicinity of campus, improvements at the Palo Alto Transit Center and contributions to Caltrain capacity expansion should be available for credentialed students or as mitigation for not meeting the no net new commute trips standard.

The approach suggested by the comment is consistent with Stanford Community Plan Implementation Recommendation SCP-C(i)(6), which reads “Encourage Stanford to identify opportunities and develop proposals for participation in off-campus trip reduction efforts. Assess the expected effectiveness of the proposed programs, and apply trip reduction credits to the annual calculation of Stanford’s compliance with the ‘no net new commute trips’ standard.”

Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for additional information on options to achieve no net new trips standard. The no net new commute trips standard is a monitored performance standard, as opposed to a prescribed set of transportation demand management measures. The measures that Stanford uses to achieve the performance standard may change over time.

Mitigation Measure 5.15-2 has been revised to clarify that the County Planning Office will use the trip fees collected from Stanford to fund the intersection improvements listed in Table 1 of this mitigation measure if it is feasible to do so. If it is not feasible to use the fees for the specified intersection improvements, the County will use the fees for other trip reduction programs in the local impact area to encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area.²¹ The County

²¹ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

Planning Office will decide how to use trip fees collected from Stanford when and if Stanford exceeds the no net new commute trip standard. At that time, the County Planning Office would also determine the appropriate plan for implementing the funded improvements or programs. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

- A-SCVTA-5 The Draft EIR did not identify an environmental impact of the proposed Project that would be substantially reduced through a requirement that Stanford share its electric charging stations for buses. Stanford's electric charging stations are privately operated facilities, and Stanford reports that all of its chargers on its campus will be prioritized to charge Marguerite shuttles. Shared charging stations could be explored at the Palo Alto Transit Center. However, this request would need to be explored in the future for liability issues, operational issues/constraints, and potential development limitations.
- A-SCVTA-6 Please see Chapter 2 in this Response to Comments Document for the corrected text.
- A-SCVTA-7 Stanford is part of many technical and regional groups that share best practices. If SCVTA seeks technical assistance or would like Stanford to share best practices, Stanford has expressed willingness to assist SCVTA. The County does not consider such a condition to be necessary.
- A-SCVTA-8 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on the no net new trips policy.
- A-SCVTA-9 The comment is noted; no response is required.
- A-SCVTA-10 The comment is noted; no response is required.
- A-SCVTA-11 The comment is noted; no response is required.
- A-SCVTA-12 The comment is noted; no response is required.
- A-SCVTA-13 The comment is noted; no response is required.
- A-SCVTA-14 The comment is noted and this planned project will be added to the description of pedestrian and bicycle facilities in the Final EIR. Please see Chapter 2 in this Response to Comments Document for the corrected text.
- A-SCVTA-15 Mitigation Measure 5.15-2(a) has been revised to clarify that any fees collected from Stanford will be expended to fund the intersection improvements listed in

Table 1 of this mitigation measure if it is feasible to do so. If it is not feasible to use the fees for the specified intersection improvements, the County will use the fees for other trip reduction programs in the local impact to encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area. The County Planning Office will determine priorities for use of funds collected from Stanford in consultation with affected jurisdictions. Funding for BEP projects would fit within the potential uses of the funds described by Draft EIR Mitigation Measure 5.15-2 if other trip reduction programs are funded. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

A-SCVTA-16 The comment is noted; no response is required.

File: 33515
Various

February 2, 2018

Mr. David Rader
Santa Clara County Planning Office, County Government Center
70 West Hedding Street, 7th Floor, East Wing
San Jose, CA 95110

Subject: Stanford University 2018 General Use Permit
Draft Environmental Impact Report

Dear Mr. Rader:

Santa Clara Valley Water District (District) has reviewed the Draft Environmental Impact Report (DEIR) for the Stanford University 2018 General Use Permit. The District is a special district with jurisdiction throughout Santa Clara County. The District acts as the county's groundwater management agency, principal water resources manager, flood protection agency and is the steward for its watersheds, streams and creeks, and underground aquifers.

This letter transmits comments that focus on the areas of interest and expertise of the District and supersedes the District's previously submitted comment letter dated December 4, 2017.

Hydrology and Water Quality

- *Pages 5.9-6 and 5.9-7—Detention Facilities*

Comment: The County has provided the District copies of the Stanford University Storm Drainage Detention Master Plan (Master Plan) dated April 10, 2001 and the Storm Drainage Master Plan Supplement (Supplement) for the West Campus Detention Facilities (affects only San Francisquito watershed) dated September 25, 2003. However, both the Master Plan and the Supplement reports only state the methodology and design criteria that will be used for future detention basins and provide a planning level design to demonstrate that the locations identified for future basins will be large enough to provide the appropriate mitigation. The reports state that the capacity of the actual detention basins to reduce peak flows will be documented at the time of construction. Since the approval of the Master Plan and Supplement reports, three detention basins have been constructed. The District recommends that the DEIR include in its appendices copies of the hydrology and drainage reports approved by the County of Santa Clara demonstrating the detention capacity for each of the three existing detention basins constructed under the 2000 General Use Permit and which are being relied upon for mitigation for construction under the 2018 General Use Permit. The District would also like to obtain the models that were used for each of the reports.

1

Mr. David Rader
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- *Page 5.9-28, Impact 5.9-6: Project development would create runoff, but would not exceed the capacity of existing or planned stormwater infrastructure, or result in flooding on- or off-site.*

Comment: This DEIR states that existing detention facilities constructed under the 2000 General Use Permit are designed to mitigate the 100-year design storm flow and therefore the impact will be less than significant. However, the District does not believe that this impact can be considered less than significant if the detention basins only mitigate for increased runoff from 100-year storm flow for the following reasons:

1. San Francisquito Creek cannot contain the 100-year storm event. It is currently estimated that the downstream capacity of San Francisquito Creek is an approximately 20-year event. Therefore, any increased runoff from new development during 20-year storm events or larger may increase the frequency of flooding on San Francisquito Creek or increase the amount of flooding.
2. District is concerned that the Master Plan and the Supplement reports have inconsistent design criteria. The Master Plan states the detention facilities will mitigate for the 10-year and 100-year storm flow and, in addition, demonstrate there will be no increases in the peak flows in San Francisquito Creek or Matadero Creek. However, the Supplement states that there will only be mitigation for the 10-year flow for areas draining to non-Stanford storm drainage infrastructure and then states that none of the West Campus drains to non-Stanford storm drainage infrastructure, and therefore they only need to mitigate for the 100-year flood.

The District recommends that Mitigation be provided for Impact 5.9-6. The recommended Mitigation Measure would include requirements to have the applicant provide modeling, construction plans, hydrology and drainage reports for each detention basin relied upon for mitigation with appropriate watershed mapping for each existing detention basin that is relied upon for mitigation of the 2018 General Use Permit development and have the submitted documentation peer reviewed by an appropriate Registered Engineer or flood protection agency to demonstrate that the existing detention basins properly mitigate for increased runoff (peak flows and volume) from new development and existing development constructed under the 2000 General Use Permit for storm events ranging from the 10-year (for areas draining to infrastructure limited to 10-year capacity), 20-year (for areas draining to San Francisquito Creek), and up to the 100-year flow, as well as demonstrating that the peak flows in the receiving creeks are not exceeded during the same range of storm events prior to approval of any additional development that has the potential to increase runoff leaving the site or modify the existing drainage patterns within the General Use Permit area.

- *Page 5.9-8—"The Santa Clara Valley groundwater basin has not been adjudicated, is not identified by the DWR as an overdrafted basin, nor is it projected to enter a state of overdraft. The Santa Clara Valley Water District (SCVWD) has submitted an application to the DWR to serve as the Groundwater Sustainability Agency for this basin."*

Comment: The last statement should be updated to read: "The Santa Clara Valley Water District is designated by DWR as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin."

Mr. David Rader
Page 3
February 2, 2018

- *Page 5.9-9—The footnote reads: "Alluvial fan sediments in the San Francisquito Cone form the water-bearing sediments of what the U.S. Geological Survey has defined as the "San Francisquito Cone Subbasin", a smaller groundwater basin that straddles the San Mateo Plain subbasin and the Santa Clara subbasin boundary."*

Comment: It should be noted that the San Francisquito Cone is not recognized as a subbasin by DWR with regard to Sustainable Groundwater Management Act compliance.

- *Page 5.9-12- Groundwater Recharge Zone Map*
Please note that the most updated map of the Santa Clara Subbasin is available in GIS format as part of the "Santa Clara County Groundwater Subbasins" coverage at <http://data-valleywater.opendata.arcgis.com/>. This includes the extent of the Santa Clara Subbasin as mapped by DWR, District groundwater management areas, and the approximate location of the boundary between groundwater recharge areas and confined areas of the subbasins.

- *Page 5.9-16—Sustainable Groundwater Management Act(SGMA)*
"Pursuant to the SGMA, any local agency that has water supply, water management, or land use responsibilities within a groundwater basin may elect to be a "groundwater sustainability agency" (GSA) for that basin (Water Code Section 10723). Local agencies had until January 1, 2017 to elect to become or form a groundwater sustainability agency. In the event a basin is not within the management area of a groundwater sustainability agency, the county within which the basin is located will be presumed to be the groundwater sustainability agency for the basin. However, the county may decline to serve in this capacity (Water Code Section 19724)."

Comment: The deadline for GSA formation was June 30, 2017, not January 1 as noted. This section should be updated to reflect local SGMA compliance status. Water Code Section 10723 designates agencies created by statute to manage groundwater (including the SCVWD) as the exclusive local agencies within their respective statutory boundaries with powers to comply with SGMA. The District submitted the required information to DWR and is identified as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin.

- *Page 5.9-23—Mitigation Measure 5.9-1*

Comment: The SCVWD supports Mitigation Measure 5.9-1 to identify and properly destroy abandoned or inactive wells.

- *Page 5.9-26—Mitigation Measure 5.9-4: As under baseline conditions, under the proposed 2018 General Use Permit Stanford's groundwater wells would be used to supplement local surface water sources for the non-potable landscape irrigation system and, if needed, for the Lagunita reservoir to maintain water levels; and are only anticipated to be used for the domestic water system as an emergency water source... Finally, it is estimated that the projected annual non-potable water use that would occur over the duration of the proposed 2018 General Use Permit could be safely withdrawn without causing excessive drawdown in the aquifer (Schaaf & Wheeler, 2017).*

Comment: The statement that Stanford's projected groundwater use will be similar to baseline conditions is aligned with water demands used in SCVWD long-term water supply

Mr. David Rader
Page 4
February 2, 2018

planning efforts. The conclusion on excessive drawdown appears to relate to the statement in the 2017 Water Supply Assessment (WSA Appendix, Page 20) that *"unpublished internal groundwater modeling studies have indicated that Stanford (or others) could withdraw up to 1,700 AFY (1.52 mgd) from its wells without impacting water quality in the aquifer or causing unacceptable impacts (e.g. excessive drawdown, land subsidence, saltwater intrusion)."* Documentation should be provided to support this statement, or the statement should be removed as this pumping level exceeds projected groundwater demands presented in the WSA.

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cont.

- *Page 5.9-27—Mitigation Measure 5.9-4: Stanford Utilities shall review individual projects proposed under the 2018 General Use Permit for changes in impervious surface area within the Unconfined Groundwater Zone. The accounting of the recharge effort shall be tracked to ensure that all future development will continue to result in an annual net positive recharge in the Unconfined Groundwater Zone. Record of monitored data shall be submitted to the County on an annual basis and Santa Clara Valley Water District and include both water volumes and water quality data.*

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Comment: Please note the comment above regarding the most updated mapping of the subbasin and unconfined (groundwater recharge) area. The SCVWD looks forward to receiving this data on an annual basis. Please submit this to Vanessa De La Piedra, Groundwater Management Unit Manager.

- *Page 5.9-30, Impact 5.9-8: The Project, in combination with past, present, and future projects could potentially contribute to depletion in groundwater supplies or interfere with groundwater recharge.*

Comment: 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 District 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.

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The SCVWD is designated as the GSA for the Santa Clara Subbasin, which comprises a portion of the larger Santa Clara Valley Basin. A GSA must submit and implement a GSP or prescribed alternative under SGMA. 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.

- *Page 5.9-30, Impact 5.9-9: The Project, in combination with past, present, and future projects would not result in substantial adverse cumulative surface hydrology impacts.*

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Comment: Please refer to our comments on Impact 5.9-6.

Mr. David Rader
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February 2, 2018

We appreciate the opportunity to comment on the DEIR. We look forward to reviewing the Final Environmental Impact Report when it is prepared. If you have any questions, you may contact me at (408) 630-2319, or by e-mail at yarroyo@valleywater.org. Please reference District File No. 33515 on future correspondence regarding this project.

Sincerely,



Yvonne Arroyo
Associate Engineer
Community Projects Review Unit

Cc: M. Richardson, U. Chatwani, S. Tippets, Y. Arroyo, V. De La Piedra, L. Xu, M. Martin, A. Rouhani, File

5.2.1.15 Responses to Comments from Santa Clara Valley Water District

- A-SCVWD-1 Please see Appendix SDR in this Response to Comments Document, which includes the hydrology and drainage reports for Stanford's detention facilities; see also Master Response 7: Flooding/Detention, generally, and in particular, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities.
- A-SCVWD-2 As explained in Master Response 7: Flooding/Detention, Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event, Stanford's detention facilities for the San Francisquito and Matadero watersheds are designed to attenuate the peak runoff flow rates from all storms ranging from the 10-year recurrence interval storm through and including the 100-year storm. The detention basins' volume/capacity is sized so that they contain the runoff for all such storms up to and including the 100-year storm, before they fill.
- With respect to perceived inconsistencies in the Master Plan and Supplement reports for the basin serving the San Francisquito Creek watershed, please also see Master Response 7: Flooding/Detention, Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event, which demonstrates that the engineering design of the detention facilities was attenuation of peak flows ranging from the 10-year storm to the 100-year storm.
- Please also see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities, Topic 2: Monitoring of Stanford's Detention Capacity, and Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit.
- A-SCVWD-3 The comment is noted. Please see Chapter 2 in this Response to Comments Document for the revised text.
- A-SCVWD-4 The comment is acknowledged.
- A-SCVWD-5 The comment is noted. Since submittal of SCVWD's comment letter on the Draft EIR, subsequent coordination has occurred between the County, SCVWD and Stanford on the groundwater recharge zone. The SCVWD recommended that the County use USGS 2006 Quaternary deposit mapping for the purposes of delineating the groundwater recharge zone at Stanford, in support of the proposed 2018 General Use Permit environmental analysis. The USGS 2006 Quaternary deposit mapping delineates unconsolidated alluvial sediments, and aligns with the SCVWD's Groundwater Management Plan. A proposed updated map of the unconfined area prepared by SCVWD was peer reviewed by the County, and determined to be based on reasonable assumptions and technically

adequate for use in defining the groundwater recharge zone at Stanford for the proposed 2018 General Use Permit. Based on this revised unconfined area map, Draft EIR Figure 5.9-4: Groundwater Recharge Zone in the Draft EIR has been revised. Please see Chapter 2 in this Response to Comments Document for a revised Figure 5.9-4.

- A-SCVWD-6 The comment is noted. Please see Chapter 2 in this Response to Comments Document for the revised text.
- A-SCVWD-7 The comment is acknowledged.
- A-SCVWD-8 Please see Response to Comments A-PA-34 and A-PA-35, above.
- A-SCVWD-9 Please see Chapter 2 in this Response to Comments Document for a revised Figure 5.9-4.
- A-SCVWD-10 Please see Chapter 2 in this Response to Comments Document for clarifying text added to Draft EIR Impact 5.9-8.
- A-SCVWD-11 Please see Master Response 7: Flooding/Detention.



Comment Letter A-SFCJPA

January 25, 2018

Mr. David Rader
Santa Clara County
Department of Planning and Development
70 West Hedding Street
San Jose, CA 95110

Re: Comments on the Stanford University 2018 General Use Permit Draft Environmental Impact Report

Dear Mr. Rader:

The San Francisquito Creek Joint Powers Authority (SFCJPA) is a regional government agency that plans, designs, and implements capital projects that advance flood protection, ecosystems, and recreational opportunities across jurisdictional boundaries of its member agencies on the San Francisco Peninsula. We serve on the SFCJPA Board of Directors along with the mayors of Palo Alto and Menlo Park and the vice mayor of East Palo Alto. On behalf of the Board, we respectfully submit a comment regarding the finding of a "Less Than Significant" impact and no required mitigation for Impact 5.9-6: "Project development would create runoff, but would not exceed the capacity of existing or planned stormwater infrastructure, or result in flooding on- or off-site," within the Draft Environmental Impact Report (DEIR) for Stanford's 2018 General Use Permit (GUP) application to Santa Clara County.

The DEIR's discussion of this impact begins by acknowledging that new projects developed under the GUP could result in runoff that increases flows downstream and thus causes or exacerbates flooding. It states that the County requires that these projects safely convey all storm runoff through storm drain infrastructure or divert it to on-site detention facilities (that are mostly recreational fields). It concludes with statements that the detention facilities constructed as a condition of the 2000 GUP are designed to accommodate the 100-year storm flow and that they are "more than adequate to accommodate the net increase in impervious surfaces that would occur under the 2018 General Use Permit."

Technical staff at the SFCJPA and its member agencies have reviewed the Storm Drainage Detention Master Plan and the 2000 GUP Annual Reports, which are cited in the DEIR as the basis for the statements mentioned above. While helpful, these documents do not provide the information necessary to verify the capacity of the stormdrains.

Most importantly, while the 100-year event is of concern, the fact is downstream communities begin flooding during a 22-year storm flow in San Francisquito Creek. Thus, future campus development must not contribute runoff into the Creek's watershed throughout the peak flow period during an event equal to or larger than a 22-year storm, and not just for a 100-year event. If, as stated in the DEIR and its supporting documents, Stanford's existing detention basins are designed to only protect against the 100-year event, then the flooding impact of new development proposed under the 2018 GUP should be considered "Significant" until it is mitigated through the creation of a new detention basin. The SFCJPA is working with Stanford on, and analyzing within its own EIR, possible floodwater detention basins to reduce this proven threat to public safety, and we look forward to the construction of facilities that fulfill this need.

Sincerely,

Dave Pine
SFCJPA Board Chair
Supervisor, San Mateo County

Gary Kremen
SFCJPA Board Vice Chair
Director, Santa Clara Valley Water District

cc: Supervisor Joe Simitian, Santa Clara County
SFCJPA Board of Directors and Executive Director

5.2.1.16 Responses to Comments from San Francisquito Creek Joint Powers Authority

A-SFCJPA-1 No response is required.

A-SFCJPA-2 Please see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities, Topic 2: Monitoring of Stanford's Detention Capacity, and Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit.

A-SFCJPA-3 Please see Master Response 7: Flooding/Detention, Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event, and Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

Comment Letter A-SMC

COUNTY OF SAN MATEO BOARD OF SUPERVISORS

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January 26, 2018

David Rader
County of Santa Clara
Department of Planning and Development
County Government Center
70 West Hedding Street
San Jose, CA 95110

SUBJECT: Draft Environmental Impact Report for Stanford University's 2018 General Use Permit Application

Dear Mr. Rader:

San Mateo County appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Stanford University's 2018 General Use Permit Application (GUP), and your agreement to the extend the time in which San Mateo County may submit its comments. We also extend our thanks to the Director of Santa Clara Planning and Development Department for Santa Clara County staff's attendance at hearings of the San Mateo County Planning Commission and Board of Supervisors regarding this environmental review.

In addition to the hearings attended by Mr. Girard, San Mateo County conducted a community meeting on November 29, 2017, at which representatives of Stanford University were in attendance. This comment letter describes and summarizes the issues and concerns that were raised at these meetings, as well as additional matters that have been identified by County staff.

1. Regional Impacts and Proposed Mitigation

The DEIR states that the GUP project, which has been described by some as the largest development project ever proposed within Santa Clara County, will result in significant unavoidable impacts on transportation, historic resources, and noise. San Mateo County notes that the DEIR does not -- but, in our view, should -- identify impacts on housing as a potentially significant impact of the project, for the reasons described in Section 4 of this letter.

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Many of the project's significant impacts, particularly on transportation and housing, will be experienced within San Mateo County. As detailed below, the DEIR has not adequately identified the specific impacts that will be experienced within unincorporated communities of San Mateo County, such as North Fair Oaks, West Menlo Park, Menlo Oaks, Stanford Weekend Acres, and the roadways upon which these communities rely. Moreover, descriptions of methods for mitigating these impacts are either absent from the DEIR or insufficiently detailed. For example, there is no description of how the housing fund intended to offset housing impacts will be distributed, nor any explanation of how roadway and intersection improvements will be carried out in terms of timing and selection.

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In order to address these deficiencies, San Mateo County requests more detailed analyses of community specific impacts that study, among other things, the following:

- current "cut-through" traffic patterns;
- the percent of Stanford students, faculty, and employees who currently work or reside in specific communities of unincorporated San Mateo County;
- alternative methods for reducing "cut through" traffic and other project-related traffic circulation impacts by exploring on-campus roadway improvements that provide direct access to and from Highway 280; and
- the feasibility of providing expanded transit services to the communities where Stanford students, faculty, employees, and affiliates reside.

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San Mateo County also requests a detailed description of the method by which the housing fund proposed in the DEIR will be distributed. In this regard, the County recommends direct contributions to impacted jurisdictions in an amount that is proportional to the anticipated housing-related impact. To this end, we submit that \$20 per square foot of new campus facilities is too low an amount to effectively mitigate the significant demand for off campus housing units that the project will generate. Many local jurisdictions within the region have recently prepared nexus studies to determine appropriate housing impact fees for development projects. A similar level of analysis should be performed to determine the amount that must be contributed by Stanford.

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Further, we request a detailed description of how specific intersection, roadway, and transit improvements will be selected for implementation, and the process that will be used to coordinate the construction of these improvements with local jurisdictions and transportation agencies. The limited information provided by the DEIR in this regard places these decisions entirely within the jurisdiction of the Santa Clara County Planning Office, and limits Stanford's responsibilities to paying a fair share contribution. San Mateo County believes that a much more coordinated, transparent, and reliable method for implementing these mitigation measures must be provided before they can be assumed to be effective.

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2. Transportation and Circulation

The DEIR identifies that the proposed development will result in significant adverse and unavoidable circulation impacts if Stanford is unable to achieve its goal of no new peak hour trips. However, the DEIR does not adequately establish that adverse traffic impacts will be avoided if Stanford is able to

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achieve the goal of no new peak hour trips, as traffic problems are certainly not limited to the single busiest hour of the day.

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Even if Stanford can establish its ability to achieve this goal, which seems challenging under the current monitoring system that is both limited in duration and prone to human error, the trips generated outside of the peak hour also have the potential to cause significant adverse impacts that would go unmitigated under the proposed approach. Therefore, consideration should be given to installing modern license reading technologies that would provide much more robust and accurate data, during longer periods of the day. Another inadequacy of the proposed “no new peak hour” trip standard is that many types of trips (such as trips to Stanford Hospital) are not counted under that standard, which precludes an effective assessment of actual circulation impacts.

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With regard to the circulation impacts on communities within San Mateo County that are identified by the DEIR, we have particular concerns about the intersections listed in the following table:

Node #	Intersection	Existing LOS AM/PM Table 5.15-2	With Project 2018 LOS AM/PM Table 5.15-19	With Project 2035 LOS AM/PM Table 5.15-29
#2	Sand Hill Rd and I-280	D/B	F/C+	F/B-
#24	Alpine Rd and I-280	D/C	D/D	D/D
#59	Middlefield and Marsh Rd	C/D	C/D-	E-/E

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Intersection #24 is an existing 3 way stop controlled intersection. In contrast to the data presented by the DEIR, San Mateo County’s analysis of this intersection shows LOS C/F/E for 7:30-8:30 AM/3-4PM/ 5-6 PM respectively. San Mateo County requests that Santa Clara County provide additional analyses to resolve this discrepancy. In addition, the DEIR proposes no mitigation for the anticipated impacts to this intersection, notwithstanding current County of San Mateo Traffic Impact Requirements, which mandate that all impacts be mitigated. San Mateo County therefore further requests that Santa Clara County address how the project will comply with these requirement, and reference them in Section 5.15-5.55 regarding Local Regulations

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At intersection #59, within the City of Atherton, there are no mitigation or cost sharing requirements for intersection improvements. Impacts at this intersection will affect unincorporated San Mateo County communities in North Fair Oaks and Menlo Oaks. More details are needed to understand how project impacts to this intersection will be mitigated.

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With further regard to our concerns regarding the ability to effectively document compliance with no new peak hour trip threshold, we note that Figure 5.15-6 of DEIR, which is used for both 2018 and 2035 transportation models, assumes that the off campus vehicle trips are only generated by Stanford’s off-campus commuters. It does not include trips by on-campus residents to off campus areas. The trip generation was developed using a survey of existing student, faculty, and employees. However, due to

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the cost of available housing in this area, the distribution of future trips may vary significantly. A summary of the vehicle trips generated by percentage is listed below along with existing transit and bicycle facilities in these corridors:

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cont.

Location	Percent Auto Trips	Transit Service available	Bike Route Available	In Cordon Credit Area?
Alpine Road	1.5%	Sam Trans	Class II and Class III	Y
Alameda de las Pulgas	4.5%	Sam Trans	Class II and Class III	Y
Marsh Road	2%	Sam Trans	None	Y

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The above table represents the percent of new vehicle trips to and from Stanford University's main campus, but it does not include any percentages for future trips to Stanford Hospital or other Stanford affiliates. The forecasted trip generation in 2035 assumes the same trip distribution as the current Stanford Campus population. This should be reviewed against the data provided by AECOM for the County of Santa Clara in the Traffic Monitoring Report for 2014, which identified that approximately 80% of the trips within the cordon area came from the Hospital, and the remaining 20% from the Campus. With respect to future impacts, the trip distribution should include a survey of the trip habits of the Hospital population as well as the campus population.

The DEIR identifies that the County of Santa Clara will continue to monitor and collect traffic data in the cordon areas to monitor trip increases or decreases across 16 gateways in the campus. Mitigation measure 5.15-2 allows the applicant to receive credits to offset increases in trips within the Stanford Campus by providing improvements within the Cordon Credit Area outside of the campus (see Figure 5.15-8 for cordon credit area and Figure 5.15-2 for cordon area).

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With regard to this proposal, San Mateo County requests that Santa Clara County clarify the following:

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- How are credits determined to offset increases in the number of trips in the cordon area?
- Mitigation 5.15-2 2.ii.b.1 notes that Stanford Hospital trips are excluded from the cordon count. Note that the Final Report 'Stanford University 2004 Traffic Monitoring Report' stated on page 13 that "most of the credits claimed are for the 77 passengers (mostly Stanford Hospital employees) getting on the shuttle outside the cordon area." San Mateo County notes that if the premise is that Stanford Hospital is a separate entity from Stanford University, it seems appropriate for passengers on the shuttle to be counted towards the TDM for Stanford Hospital and not counted again for the TDM for the University. San Mateo County requests that Santa Clara County provide further analysis as to this point.
- San Mateo County also requests that Santa Clara County clarify if Gateway #2 at Sand Hill Road shows an increase in number of trips above baseline, would a bicycle improvement project on Page Mill Road help to offset this increase thus allowing increased traffic at Gateway #2?
- San Mateo County further requests that Santa Clara County explain how it will determine which areas will receive priority funding for off campus circulation infrastructure improvements. Can

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each jurisdiction receive funding from Stanford to offset the increase in traffic without competing with other jurisdictions for these funds?

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cont.

In light of the above questions and concerns, we suggest a mitigation measure requiring a Traffic Impact Analysis as part of each building permit application. This would provide an opportunity to check the assumptions made about traffic patterns against actual traffic conditions, and provide a more direct method for identifying the specific improvements that should be installed prior to or concurrently with the proposed construction.

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Construction Truck Routes:

Please address the potential impacts of construction vehicles on pedestrian and bicyclist safety. In order to minimize such impacts, and reduce noise and traffic, truck traffic should be restricted on Alameda de las Pulgas, Santa Cruz Avenue, and Alpine Road, similar to the way in which truck traffic is being restricted within the Cities of Palo Alto and Menlo Park. Please have the applicant work with the County of San Mateo to identify designated truck routes and times of travel.

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Vehicle Miles Traveled:

San Mateo County appreciates the analysis of the project's impacts on Vehicle Miles Traveled (VMT), in accordance with the directives of SB743 to phase out traditional Traffic Impact Analysis (TIA) methods for CEQA compliance. Notwithstanding SB743, local jurisdictions may continue to use TIA methods to evaluate impacts from developments on local intersections to ensure smooth operations at the local level.

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In accordance with the proposed VMT guidelines published the Office of Planning and Research (OPR) in 2016, local jurisdictions are to develop their own significance criteria. The County of San Mateo does not currently have a VMT model, and hence has not published a Threshold of Significance for VMT for San Mateo County.

The project reviews VMT/capita for the Bay Area and Santa Clara County models with 17.33 and 13.08 VMT/per capita respectively. Since VMT is an estimate of the number of vehicles times the estimated miles traveled, there is variability in the data and methods of collection. Furthermore, the VMT/capita measurement is extremely sensitive as shown in the tables below:

Stanford Fall 2015 Existing Conditions

Residential VMT Summary

Demographics	Population	VMT	VMT/Capita	85% of Santa Clara	
Faculty/Staff	98	1656	16.9	$13.08 \times 0.85 = 11.1$	
Graduate Student	6065	80359	13.2	11.1	
Undergraduate	6401	34299	5.4	11.1	
Post Doctoral	28	434	15.5	11.1	
Total	12592	116748	9.3	11.1	pass

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San Mateo County notes that the population reflected in the above table includes undergraduate students who have limited access to vehicles and thus limited traffic impact to neighboring jurisdictions.

If undergraduates are removed from the analysis, the result is quite different, as shown in the table below:

Demographics	Population	VMT	VMT/Capita	85% of Santa Clara	
Faculty/Staff	98	1656	16.9	$13.08 \times 0.85 = 11.1$	
Graduate Student	6065	80359	13.2	11.1	
Post Doctoral	28	434	15.5	11.1	
Total	6191	82449	13.3	11.1	fail

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cont.

While the proposed guidelines for VMT allows regional areas to compare VMT/ gross population for the area, these guidelines do not truly represent the experience of the road users on already congested roadways in the neighboring jurisdictions.

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Also, since the VMT/capita measurement is based on population, in the case of the GUP, increases in vehicle miles traveled can be offset by increases in undergraduate population, which means that more traffic can be generated in the surrounding areas without triggering the threshold of significance under CEQA. Therefore, while the use of VMT in lieu of TIA has benefits in demanding alternative modes of transit, a standard methodology needs to be developed so that jurisdictions are using the same methods to calibrate their VMT/capita. For this project, the proposed VMT/capita calculations did not trigger a significance threshold under the County of Santa Clara's criteria, so no mitigation measures are proposed. However, the use of Santa Clara County's significance criteria to analyze impacts in other jurisdictions does not accurately represent the level of impact that will occur in areas outside of Santa Clara County, which may apply different thresholds of significance and thereby trigger the need for mitigation.

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These concerns are exacerbated by the additional non-student trips that will accompany student and faculty population growth, such as those associated with deliveries, visitors, and a growing alumni population, which have not been adequately accounted for. Further analysis of these additional trips and their impacts is needed to provide an accurate prediction of the effects of the project on traffic and circulation.

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The DEIR also refers to a Community Resource Group (CRG), which approved the Trip Reduction Credits Plan in 2003, which was required under Condition G, outlined in the 2000 GUP. However, the composition of the CRG is unclear. If this group will continue to play an important role in analyzing compliance with the new GUP and ensuring implementation of mitigation measures, we request more information about the CRG and the possibility of having San Mateo County representatives participate on the group.

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3. Project Impacts on Unincorporated Areas Adjacent to Stanford's Redwood City Campus

In response to the Notice of Preparation (NOP), we requested that the DEIR address the impacts of the proposed project on areas of San Mateo County that are adjacent to the Stanford campus under construction in Redwood City. For example, we asked for an analysis of the impacts that would be caused by an increased amount of travel between the campuses. Unfortunately, such an analysis is not provided by the DEIR. Moreover, the analysis of traffic impacts appears to be largely based on a 2015 survey of student and faculty travel patterns, prior to the establishment of the Redwood City campus.

The GUP depends on the Redwood City campus to provide administrative support for the proposed expansion in academic programs and increase in student and faculty populations, as well as to provide the physical space for new development in areas of the main campus that were formerly occupied by administrative functions. As a result, it is reasonable to expect that the GUP will result in increased trips between the two campuses, and intensify the demand for housing and parking in the communities near both campuses, particularly in North Fair Oaks. The proximity of North Fair Oaks to the Redwood City campus, and its comparative affordability to other residential areas within reasonable traveling distance to the main campus, makes it more vulnerable to the traffic, housing, and parking impacts associated with University growth, which must be accounted for in the Final EIR.

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4. Off-Site Housing Impacts

Our NOP comments also requested an analysis of the potential increase in housing costs, as well as the possible displacement of existing residents, due to increasing housing costs fueled by the greater demand for off campus housing by Stanford students, faculty, workers, and alumni. The current imbalance between employment growth and housing availability has grown to unprecedented levels, and the challenges of housing residents of all income levels has never been greater. The project's demand for an estimated additional 2,425 off-site housing units will certainly exacerbate this problem in ways that are likely to be significant. We were therefore surprised and disappointed to see the DEIR's housing-related conclusion that "no impact will result" (page 5.12-14). This statement conflicts with the determination on page 5.12-21 of the DEIR that housing and population growth impacts are "less than significant," with which we also disagree.

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Whether or not this is a potentially significant environmental impact that must be addressed by CEQA under a narrow reading of the law, it is clearly one of that is of great concern to the surrounding communities and should be addressed by Santa Clara County's action on the GUP application. Stanford's proposal to continue to contribute \$20 per square foot of development to a Santa Clara County-administered affordable housing fund is inadequate in many ways. For example, we believe that the amount to be contributed is inadequate and that there need to be an established and transparent process for distributing these funds equitably amongst the impacted jurisdictions.

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As noted above, many local jurisdictions within the region have recently prepared nexus studies to determine appropriate housing impact fees. There has also been a significant amount of discussion about how the use of such fees can be leveraged and coordinated to maximize their effectiveness. A

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similar level of analysis should be performed in order to determine the specific amount of housing impacts fees that should be contributed by Stanford, and how this money should be distributed and used.

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5. Hydrology and Water Quality

Our comments on the Notice of Preparation identified items relative to stormwater detention that have not been adequately addressed in the DEIR. Among other things, the GUP should support or compliment the efforts of the jurisdictions within the San Francisquito Creek Watershed to develop a specific plan for the detention of floodwaters on Stanford land that would result in a significant and measurable reduction in creek flows that could otherwise adversely affect or flood the downstream jurisdictions.

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While the DEIR indicates that drainage patterns may be altered in such a manner that will result in additional storm water runoff being directed to the Creek, it concludes that this will not have adverse impacts on flooding. We believe a more detailed assessment is required before such a conclusion can be reached, and to this end request that the anticipated changes in drainage patterns be quantified and shown on drainage maps.

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In addition, the proposed mitigation measures should be supplemented with greater details regarding the design parameters and performance standards for detention facilities and downstream creek improvements. These should be based on containment of flows from the 10-year and 100-year storm events, and present no net increase in storm water runoff to the neighboring downstream communities that are located within the watershed or affected by flooding from the Creek. In addition, mitigation measures should specify the timing of drainage improvements to ensure that they will be designed and implemented prior to or concurrently with proposed development.

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6. Public Services and Facilities

San Mateo County is concerned about the impact that the proposed growth in Stanford's student, faculty, and employee populations will have on public facilities, such as parks and libraries, and we are also concerned that such growth will strain public services, such as police and fire protection, beyond their current capacities. Although Stanford provides recreational opportunities on campus, there are many other highly valued park and open space areas that provide different recreational opportunities to those that are available on campus. For example, it is reasonable to assume that Stanford students, faculty, and employees enjoy the parks and beaches along San Mateo County's coastline, as well as the hiking and biking trails located in the County's rural and coastal areas. The analysis contained in the DEIR does not adequately assess this demand, and its conclusion that such impacts will be insignificant is therefore unsupported.

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With regard to public services, we are concerned about the impact that University growth will have on first responders such as police and fire protection. In addition to causing delayed response times as a result of increased traffic congestion, the University's growth will increase the demands on limited

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Comment Letter A-SMC

personnel and equipment, and thereby increase demands for mutual aid, which has not been addressed by the DEIR.

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7. Noise

Please expand the analysis of noise impacts to address the noise and vibration attributable to construction vehicle use of roadways with residential areas of San Mateo County.

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8. Statement of Overriding Considerations

Because the project will result in significant unavoidable impacts, Santa Clara County must adopt statements of overriding consideration if it approves the project. The DEIR does not, however, contain any rationale for adopting such findings. An explanation of the requirements for such findings, and the basis under which such findings could be made, should be provided.

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9. Alternatives

In addition to the four project alternatives identified and evaluated by the DEIR, San Mateo County suggests the development and analysis of a fifth option that applies a phased approach to GUP implementation. For example, the GUP could be divided into four phases, with discretionary and supplementary environmental review by Santa Clara County prior to the construction of each phase. This would enable San Mateo County and interested parties to evaluate the adequacy of proposed mitigation measures, and make adjustments where new information or changed circumstances arise, which is particularly important in light of the current absence of specifics regarding the particular types of academic facilities that will be built, as these details will have an effect on the actual environmental impacts that will result.

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10. Additional Comments

A summary of the verbal comments submitted at the community meeting conducted by San Mateo County, and copies of written correspondence submitted to San Mateo County by County residents are attached to this comment letter and are incorporated by reference herein.

Thank you for your consideration of these comments. If you have any questions regarding the content of this letter, please contact the San Mateo County Community Development Director, Steve Monowitz, at smonowitz@smcgov.org or (650) 363-1861.

Sincerely, on behalf of the San Mateo County Board of Supervisors,



Dave Pine

District 1 Supervisor and President of the San Mateo County Board of Supervisors

SAN MATEO COUNTY PUBLIC COMMENTS/CONCERNS	
Traffic	Residents expressed concerns regarding the increased traffic and congestion this project would cause, regardless of times. Current traffic congestion begins at 5am and local main roads and highways are already at capacity, which has led to an increase in cut-through traffic in residential areas. For example, traffic and wayfinding apps lead drivers through faster routes, which adds a higher volume of residential traffic. Increased traffic has led to increased noise from vehicles, oversized trucks, and motorcycles. Traffic concerns mainly focused on roads that surround Stanford (Alpine Road, Sand Hill Road, Alameda de las Pulgas, Santa Cruz Ave.) Additionally, residents expressed concern about the number of construction and/or support staff that would commute to and from Stanford during and after construction.
Housing	Residents expressed concerns about the lack of affordable housing, the lack of on-campus student housing at Stanford, and the rising cost of housing in the area. The high cost of housing (or lack of affordable housing) has prevented teachers/staff from living in the community in which they work; whereby they are forced to communicate long-distance.
Safety / Infrastructure	Residents and local fire/emergency responders expressed concerns for emergency service vehicles navigating roadways that will see increased vehicular traffic due to the Stanford expansion. Residents shared concerns that added congestion could increase the difficulty already faced by Emergency Responders trying to navigate in order to respond to Emergencies, as well as safely transporting to the hospitals. Residents expressed that the increased traffic could also lead to unsafe speeds through neighborhoods and creates a major concern for pedestrian safety of children, adults, and seniors walking/exercising through the corridor (i.e. School, crosswalks, shops, etc.). Bicyclist lanes are already narrow and with increased traffic and unsafe speeds, bicyclist and pedestrians both expressed safety concerns. Residents also shared an increased number of accidents.
Health	Residents shared concerns that increased traffic has led to poor air quality; leading to chronic health conditions (i.e. Chronic hearing loss, sleep disorder/distress, high stress level leading to cardiovascular disease, depression, anxiety, etc.). Residents expressed concerns with the secondary effects on health such as quality of life, socialization, etc. that is caused by the current and proposed project.
Other	Residents shared concerns that the impacts to other surrounding cities (Redwood City, East Menlo Park, and East Palo Alto) have not been taken into consideration in the Environmental Impact Report and should be as they will be indirectly impacted by this project as well.

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1. What are the biggest concerns about the project?

- Traffic I 56
- Affordable Housing I 57
- Pedestrian safety, especially along Santa Cruz Ave. and Sand Hill Road I 58
- Secondary effects on health
 - Chronic pain I 59
 - Complications due to increased noise I 59
 - Sleep disorders I 59
 - Air quality during construction I 59
- Concerned that general traffic and noise tends to begin at 5:00 AM I 60
- The impact on cyclists and vehicles I 61
- School children safety I 62
- That the impact to Redwood City is not taken into consideration I 63
- Concerned at the number of students / faculty workers and additional support staff were not included in the Environment Impact Report I 64
- Concerned that the metrics for measuring traffic during peak hours are not shown I 65
- Local fire departments are concerned at how increased traffic will impact fire response since the majority of the impact will be on primary response routes I 66
- The general use permit application is not taking into consideration other factors that cause traffic I 67
- Concerned that there doesn't seem to be any meaningful, comprehensive analysis of the impacts to surrounding communities I 68
- Highway 280 is already at its threshold and this project will just add more traffic I 69
- Getting updates on project progress I 70
- Stanford's "no new net commute trip" measurement is not accurate and that they didn't incorporate the hours between 6:30AM to 10PM I 71
- The group disagreed with the assertion that there would be "no new net commute trips" and referenced traffic studies conducted on Alpine and Page Mill in 2000 that should be analyzed as a benchmark or reference on what was predicted versus what was accurate I 72
- The group questioned the motivation for their expansion. They felt that the boundary lines does not represent the true impacts that this project will have on the community I 73
 - The group felt that the study is excluding the impacts this project will have on schools and underrepresented communities I 74
 - Development may not happen gradually but at different rates over the 17 year permit period causing significant impacts depending on that rate (example: increased traffic and poor air quality due to multiple construction projects implemented in a peak period of time) I 75

2. Have you experienced any impact from the current Stanford expansion?

- Cars cannot turn on Sand Hill Road after 1:30 PM now
- It is difficult to get out of Santa Cruz Ave. near Sand Hill Road due to traffic and safety
- Congestion on Alameda de las Pulgas between 7:30 AM – 10:00 AM and 3:00 PM – 7:00 PM
- Pedestrian safety near Dutch Goose (in West Menlo Park)
- Cars speeding on Santa Cruz Ave. and Sand Hill Road
- The inability to get on Alpine Road now due to traffic
- Increased air pollution
- An increase in vehicular accidents
- Traffic on Highway 280 starts at Sand Hill and stops after Cañada College, residents think that is caused by Stanford commuters
- The overall quality of life has decreased due to increased traffic due to expansions on the Stanford campus
- There has been an increase in cut-through traffic in the neighborhoods surrounding Stanford campus
- There has been an increase in dirt removal trucks on El Camino Real

I 76
I 77
I 78
I 79
I 80
I 81
I 82
I 83
I 84
I 85
I 86
I 87

3. Do you have specific concerns about traffic/housing related to the proposed project?

- An increase in Stanford students I 88
- The lack of affordable housing I 89
- Teachers are traveling far distances and unable to find housing in the neighborhood I 90
- Increase in traffic I 91
- Increase in the cost of housing I 92
- Safety, children unable to walk I 93
- Students living off-campus and the party house environment it causes I 94
- No new infrastructure has been proposed to support an increase in people living in the area due to the campus expansion I 95
 - Negative impact on water, sewers, schools, emergency medical services, public safety, police and fire departments
- Traffic mitigation measures should be implemented before construction starts I 96
- More traffic and not enough parking I 97

4. Are the other concerns we haven't captured?

- The impact on side streets due to the Waze app
- Increase in motorcycle noise
- Big trucks carrying dirt/dust and causing safety issues
- It is sometimes difficult for fire engines to get through due to traffic
- An adequate study needs to be conducted assessing flow-through traffic on the main traffic corridors to be able to determine if traffic is actually coming from Stanford

I 98
I 99
I 100
I 101
I 102

Stanford General Use Permit Meeting

Public Comments, questions, or concerns?

- Stanford should take a leadership role and plan and enact a net reduction of car trips by 2070 over the next 15 years. This is essential because traffic is already intolerable and all employers/entities [don't] help. 103
- How will Santa Clara County monitor and enforce construction mitigation requirements e.g., routes for debris disposal. 104
- Traffic on Alpine Rd has already reached gridlock conditions during rush hour which have extended to 2-3hrs. In between, 35 MPH speed limit is ignored by speeders. I am concerned that "peak" hour statistics do not correctly represent the traffic load changes. 105
- Will any of the development be of the type that is exempt from property taxes since that impacts funding for organizations/schools? 106
- Can San Mateo County enforce keeping construction traffic (large trucks, etc.) off Alpine Road? Can San Mateo County extract funding for traffic and road improvements from Stanford as part of the process? The Alpine Rd. corridor is heavily impacted by Stanford expansion. Compare Stanford 2000 GUP "predictions" of traffic, etc. to what actually happened, hold them accountable for the discrepancies. Make the GUP realistic. 107
- What analysis or evaluation has there been on the 2000 GUP? How accurate were the projection on traffic impact? We should re-evaluate the measurement tactics and metrics used to track impact. 108
- What will be the impact on emergency services (police, fire, medical) when the anticipated increase in traffic kicks in? No new net trips during "Peak Hours" is unrealistic since the affected communities are impacted by the gross number of trips of all the support functions required by the planned expansion...and that all day long! 109
- Big concern regarding pedestrian and bicycle safety crossing all 4 directions at Sandhill and Santa Cruz Ave. The present high level of traffic it is already very dangerous to cross in any direction. People making the left hand turns at high speed are blocked from seeing the cross walk by the big AT&T box, the k-rail wall and do not see the small flashing pedestrian signs across the wide intersection. We need large flashing pedestrian signs on both sides of each crossing. 110
- My concern is that this development make sure all bike lanes are adequate at least 4-5 ft. wide down Alpine Road. 111
- Can part of mitigation for increased traffic include free shuttle to stop at Menlo Commons Hourly to take residents up and down Sand Hill and Santa Cruz (to get to Stanford hospital and Stanford shopping and Safeway/CVS) and downtown Menlo Park? Mitigate noise sound and air quality impact with sound walls and plants on Santa Cruz 112
113

- Gross underestimation of traffic impact, gross underestimation of impact on local schools/hospital. Why does Stanford keep up this relentless expansion: focus on academics not monumental construction (I am an alumni; with all due respect cease this madness). Traffic congestion will prevent emergency vehicle access. Groundwater recharge impacts are only superficially addressed. Need maps to illustrate table 3:2. Show Barn & Driving Range proposed development. 114
- Please tell google maps to stop sending traffic to the "Waze parade" 115
- Concerns are traffic, emergency responses. How will enforcement be done, like following through that things are done that they say will be done! 116
- Facebook is a major expansion of the use of Menlo Park. Stanford Shopping Center, children hospital, and hospital expansion are setting a new "normal" as a base of traffic, housing, pollution, etc. That should be voiced as the new baseline for the new Stanford Project. 117
- Build garage at the intersection of 280 and Sand Hill Road (Stanford build team) and extend measures to run a shuttle from there to the Campus. That can go a long way to "solve" the Sand Hill Road traffic problem. 118
- Credited by geographic region not by entire boundary. I need specific traffic mitigation for west Menlo Park. Core campus growth and traffic demand impacts Santa Cruz and Alameda to Sand Hill. 119
- Very concerned about the negative impact of increased traffic on the safety of our senior citizens who walk for exercise. 120
- The current traffic on Sand Hill Road and Santa Cruz Avenue is already noxious in terms of gas emissions and noise pollution. The research is clear in terms of car noise/traffic on physical and mental (chronic) health, specifically, hypertension, hearing loss, sleep disturbance, tinnitus (ear ringing), high stress levels which create cardiovascular disease, depression and anxiety. 121
- The secondary negative effect of chronic noise pollution due to traffic reduces our quality of life, such as leisure time and socialization with neighbors outdoors, having to keep windows closed. 122
- Extremely concerned about the future exponential increased traffic and its impact on children safety to and from school. 123
- The air pollution's negative impact on their physical health. 124
- It appears that there is minimal structure in the process of informing Santa Clara and Stanford regarding our concerns. 125
- How can we get Stanford to take seriously the impact of their development & controlled campus on the outer non-academic community? 126
- Inadequate or inaccurate Stanford metrics on traffic. They do not measure impact on our community. 127
- How do we help San Mateo County negotiate with Santa Clara County (regarding the proposed project)? 128

Stanford GUP Community Meeting – Public Comments
11/29/17 – Oak Knoll Elementary

- Concerned about unfounded impact on La Entrada School. I 134
- We need to be clear about the property tax that Stanford does not pay. Taxes should be replaced by service fees. I 135
- No new net trips – magical thinking. I 136
- No taxes paid on construction, yet roads and infrastructure in San Mateo degraded. I 137
- Traffic study highly flawed. I 138
- Access for emergency vehicles impacted. I 139
- Truck routes disruptive. I 140
- Many many accidents not included in DEIR. I 141
- Is there any (one) entity that represents all the people affected by the extensions of Stanford? I 142
- With the new expansion on 101 and El Camino Real, the 4 major routes (Highway 101 North/South bound; El Camino, Alameda and Hwy 280) are already as close to peak all day. I 143
- False sense of ‘progress’ but self-serving for Stanford. San Mateo needs it’s own metrics. I 144
- Minimal communication between San Mateo County and Santa Clara County. I 145

Dear Dept. of Sustainability,

Thank you for facilitating the feedback meeting on 11-29-17 regarding the Stanford General Use Permit (GUP).

As you offered, here are some questions and concerns regarding the DEIR for Stanford's GUP Application (as a concerned resident):

1. RE: Responsibility for Adverse Impact:

- a. Is it legal to proceed with such a large scale project when it has already been determined it has such adverse impact by the DEIR 146
- b. Can Eminent Domain laws protect Menlo Park residents from this Development?
Could an updated definition of "take private property for public use" include the taking of property *owner's rights*, (including reasonable road access and reasonable quiet enjoyment of one's property, protection of retaining the character of the neighborhood)? 147
- c. If new adverse impact is discovered after the fact, does Stanford have to take mitigating measures after this permit might be approved? Or are they off the hook for further responsibility once it is approved? 148
- d. Who is responsible for monitoring and implementation of adequate mitigation? If the measures and standards are skewed by Stanford or lax reviewers what protections do local residents have against this? (for instance how could the DEIR reasonably conclude 2,425 off-site student housing units does not impact the neighborhood? Especially when there is extremely restricted street parking in Menlo Park)? 149
- e. Are their laws that prevent such enormous developments just by virtue of the unknown risks of impact (new risks are unknown re: noise, air pollution, stress)? 150
- f. Doesn't the responsibility lie with Stanford to prove there would be no adverse impact and take financial mitigating responsibility for any impact they failed to account for? It seems backwards that the responsibility lies with the residents to fight for their *rights after the fact*, when Stanford is the one who is impinging on those rights. Applying for a permit alone and offering a token of contribution or insignificant programs that do not mitigate problems, is not adequate by Stanford. There are concerns the review committee has a blind eye to the real problems caused and masked by Stanford's inadequate offers of accountability and mitigation. 151
- g. If the project is phased, does that hurt our ability to veto the net plan when they are parsed into smaller projects? Is there no recourse if one phase proves to be too adverse, so we may block further phases? 152
- h. Will Stanford and/or the government pay for: 153
 - sound wall barriers 153
 - plant sound barriers 153
 - stacked thoroughfare roads to immediately divert "out of city" car commuters out of residential roads such as Santa Cruz Ave., Alameda de las Pulgas, off Sand Hill road and local neighborhoods altogether. 154
 - What new stop lights will be implemented so residents can safely turn left into their driveways, specifically at 2140 Santa Cruz Ave., Menlo Park. Who pays for that? 155

- Police to monitor all the street parking invasion in our neighborhoods that already have restricted street parking. 156
- Remuneration to residents for the losses they incur due to neglecting the protection of their property rights? 157
- Will Stanford pay for new public transportation on the West Side of Menlo Park to divert traffic away from residential neighborhoods? 158

2. Traffic:

- a) Traffic on Santa Cruz Ave/Alameda de Las Pulgas, interferes with safe access for 120+ residents at Menlo Commons condominium, located at 2140 Santa Cruz Ave. .
 - 1. Property owners cannot turn left safely or easily across traffic *into* property driveway. A stop light may be necessary. 159
 - 2. 120+ Residential homeowners cannot turn left *onto* Santa Cruz Ave. into the unclear turning lane that on-coming traffic mistakes as a lane. A stop light may be necessary. 160
- b) Local parents will not be able to get their children to schools on time wading through the traffic. 161
- c) Pedestrians will be at risk for being hit. 162
- d) Normal commutes to work will take much longer Sand Hill. 163A
- e) Unreasonable burden placed on Menlo Park homeowners, who pay a premium to live near work, and now are penalized by the impact of the project. Who will compensate residents for loss of work time in traffic, of property value impact due to changing the character of the neighborhood Stanford? Are they not responsible for this? 163B
- f) Stanford may misrepresent and take inadequate mitigation measures re: traffic reduction program that suggests it reduces commuter traffic (with incentives to ride bikes, drive and park at off hours, walk or carpool). However, the impact and use of this program to reduce traffic is minimal compared to how many commuters find this impractical and costly. Review committees should not be misled that the presence of this program significantly reduces the problem of commuter traffic.

1) Student and New Stanford Staff Housing:

- a) On what basis does the DEIR state the off-campus student influx and housing needs do not impact the neighborhood? (Noise, restricted street parking, crime, safety for pedestrians)? 164
- b) Street parking is restricted already in Menlo Park. Where will all the new students and employees/staff park in the Menlo Park neighborhoods that have restricted street parking? 165
- c) Will Stanford pay our Police Department for the extra policeman necessary to monitor the parking, the noise in the neighborhood? 166
- d) How will this increase of renters, impact the noise and safety of the neighborhoods? 167
- e) What does the \$20 per square foot per facility development actually go towards? How will Stanford be responsible if greater amounts are needed to correct the adverse impact this has on our neighborhoods? 168

- f) If the above \$20/sf. Development contribution is accepted, does that let Stanford off the hook for further costs of adverse impact, which are being not accounted for at this time?

169

Thank you for time.

Robin Ginsberg

Menlo Park Resident

Subject: Feedback re: Stanford Development

To the County of San Mateo,

Thank you for your efforts to protect the concerns of San Mateo County and residents regarding the massive proposed development by Stanford. Here is the feedback requested from me as a citizen of San Mateo:

Concerns:

1. If Stanford were to act ethically (and I hope there is legal recourse to require they do these things), they would:
 - a. Pay for plant and walls for sound barriers, new forms of built roadway thoroughfares that get distance commuters bypassing the local streets (and not feeding off of 280 and Sand Hill. 170
 - b. Stanford will subsidize at a greater rate than the \$20 per (---) for affordable housing. 171
 - c. Stanford will subsidize the police needed to monitor the limited street parking that would be abused by the proposed amount of students living off campus. Who is expected to pay for that? 172
 - d. Stanford will increase the parking and residence capacity on campus. 173
2. Traffic Safety and Unreasonable Delays:
 - a. I cannot turn left safely *into* my home driveway at 2140 Santa Cruz Ave. A stop light may be necessary. 174
 - b. I cannot turn left *onto* Santa Cruz Ave. from 2140 Santa Cruz, into the unclear turning lane that on coming traffic mistakes as a lane. A stop light may be necessary. 175
 - c. Local parents will not be able to get their children to schools on time wading through the traffic. 176
 - d. Pedestrians are at risk to being hit by rushed commuters 177
 - e. Better off road sidewalks are needed all around the campus that have protection, barrier walls, plants and pathways to protect pedestrians from smog, noise, being killed by careless rushed drivers. 178
 - f. My usual 6 minute commute to Stanford (I am an employee at Stanford) might now take an hour? I pay a high premium to live in Menlo Park to be close to work and it is not fair to pay those taxes and delays. 179
3. Air and Stress quality. 181
4. The measures that are used to review impact at peak commuter traffic are skewed in the following ways. Here are the ways information can be skewed: 182

- | | | |
|--|----------|----------------------|
| <p>a. The impact to Sand Hill commuter bottlenecks and West Menlo Park residents may be overlooked by the EIR in favor of just noting the East side commuters and CalTrain.</p> | <p>↑</p> | <p>182
cont.</p> |
| <p>b. Stanford may present bogus information suggesting they mitigate traffic by citing the incentive programs for people to carpool, bike, walk, or to use public transit. The truth is the mere presence of these programs does not account for the large numbers of commuters to Stanford who do NOT use these programs because it poses great hardship of lost time where families must provide childcare for the longer hours of using these programs. It is costly and not practical to spend hours to use these programs.</p> | <p>↑</p> | <p>183</p> |
| <p>5. Limited street parking in Menlo Park will be exacerbated making unreasonable hardship on residents who live there . Is there a law that requires a certain amount of street parking for the population that will reside there, including the new influx of students, patients of the medical centers, and workers Stanford will increase? What street parking will be available for the increased students of the affordable housing?</p> | <p>↑</p> | <p>184</p> |
| <p>6. The measures of environmental impact are skewed in Stanford's favor. What is the EIR doing to ensure Stanford's measures are not skewed.</p> | <p>↑</p> | <p>185</p> |

Questions:

- | | | |
|---|----------|------------|
| <p>1. Can Eminent Domain laws protect Menlo Park residents from this Development? Could an updated definition of what it means to "take private property for public use" include the taking of property owners rights to safe, and reasonable access for the quiet enjoyment of one's private property and to the protection of their property value?</p> | <p>↑</p> | <p>186</p> |
|---|----------|------------|

When a tax-paying Menlo Park resident suddenly has a 6X commuter time just to turn into their private driveway across traffic is such an example.

What fair compensation AND alternative roadways and technology will Stanford and/or the government pay for to ensure fairness to property owners? (sound walls, plants, new stacked thoroughfare highways to immediately divert "out of city" commuters out of residential roads such as Santa Cruz Ave., Alameda, off Sand Hill road and local neighborhoods altogether.

What stop lights will be implemented so residents can safely turn left into their driveways, Specifically at 2140 Santa Cruz Ave., Menlo Park.

- | | | |
|--|----------|------------|
| <p>2. Are their laws that prevent such enormous developments merely because it is unrealistic to know predict or manage harmful effects of the development? If it is</p> | <p>↓</p> | <p>188</p> |
|--|----------|------------|

- broken down into smaller projects, does that hurt our ability to veto the net plan when they are parsed into smaller projects? ↑ 188
cont.
3. Does the EIR measure the effects on health risks from stress due to traffic, increased traffic accidents for pedestrians, children, bicyclists, etc., poor air quality. Will this negatively impacting homeowners property value, and will Stanford fairly compensate home owners for this impact diminished value? I 190
I 191
I 192
4. What can you do to ensure the EIR is unbiased? . Will the EIR ensure Stanford does not present limited information and look at full impact? I 193

Thank you for time.
Robin Ginsberg
Menlo Park Resident

Alpine: Use of Path/School bus stop

Thank you for these pictures, Janet. This is the exact spot where TWICE in the last 2 months we were almost hit by a car walking to the school bus. The car had to slam on the brakes and veered onto the path. We literally had to jump out of the way. The second time this happened, the driver, on his way to his job at Stanford, was so startled he pulled over and another bystander also pulled over to see if we were ok. I immediately reported both incidents to the police who promised increase patrolling during school bus pick up times. We have only seen the police come once and they were patrolling the other side of the road by Wildwood. I am so scared that we will be killed walking to the bus. I am afraid that no one will do anything until someone is killed or severely injured.

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Thank you for reading,

Rebecca Altamirano

2499 Alpine Road

On Thu, Nov 30, 2017 at 3:55 PM, Janet Davis wrote:

Attached are a few photos. Last night Antonio Altamirano mentioned the problem that I have cited several times before concerning cars using the bike lane and even the pedestrian path in the vicinity of Wildwood Lane, right at the blind corner. Although I could not get a picture of cars doing this because when they saw me with a camera, those cars on the path or in the bike lane swerved back onto the main road.

195

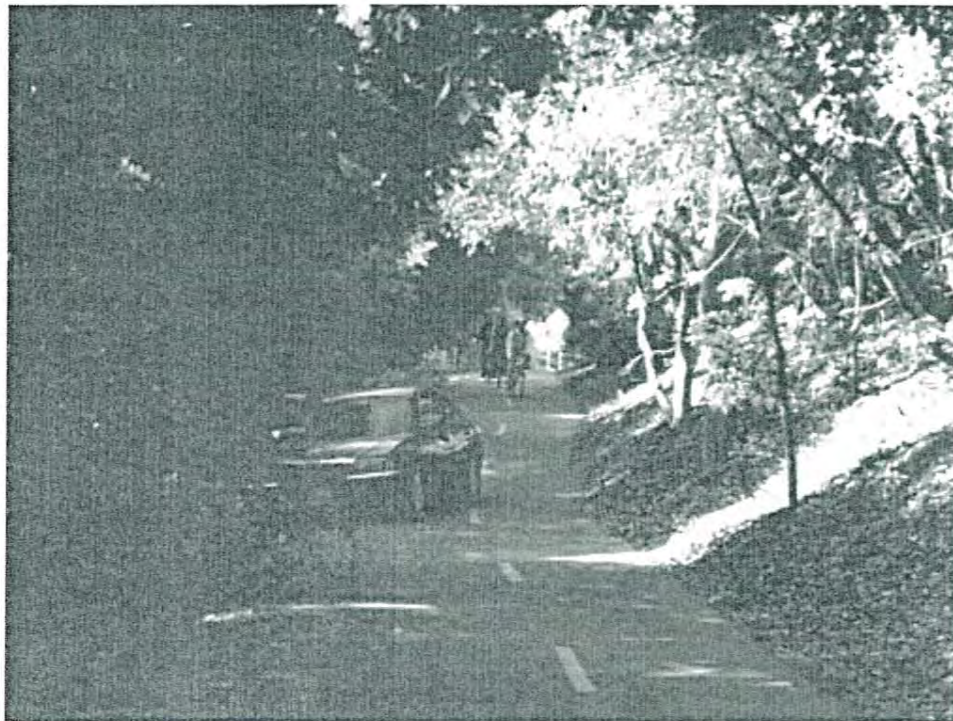
I also attach a picture of the place where the school buses stop at the corner of Stowe and Alpine and where they are typically overtaken by all the vehicles behind them.

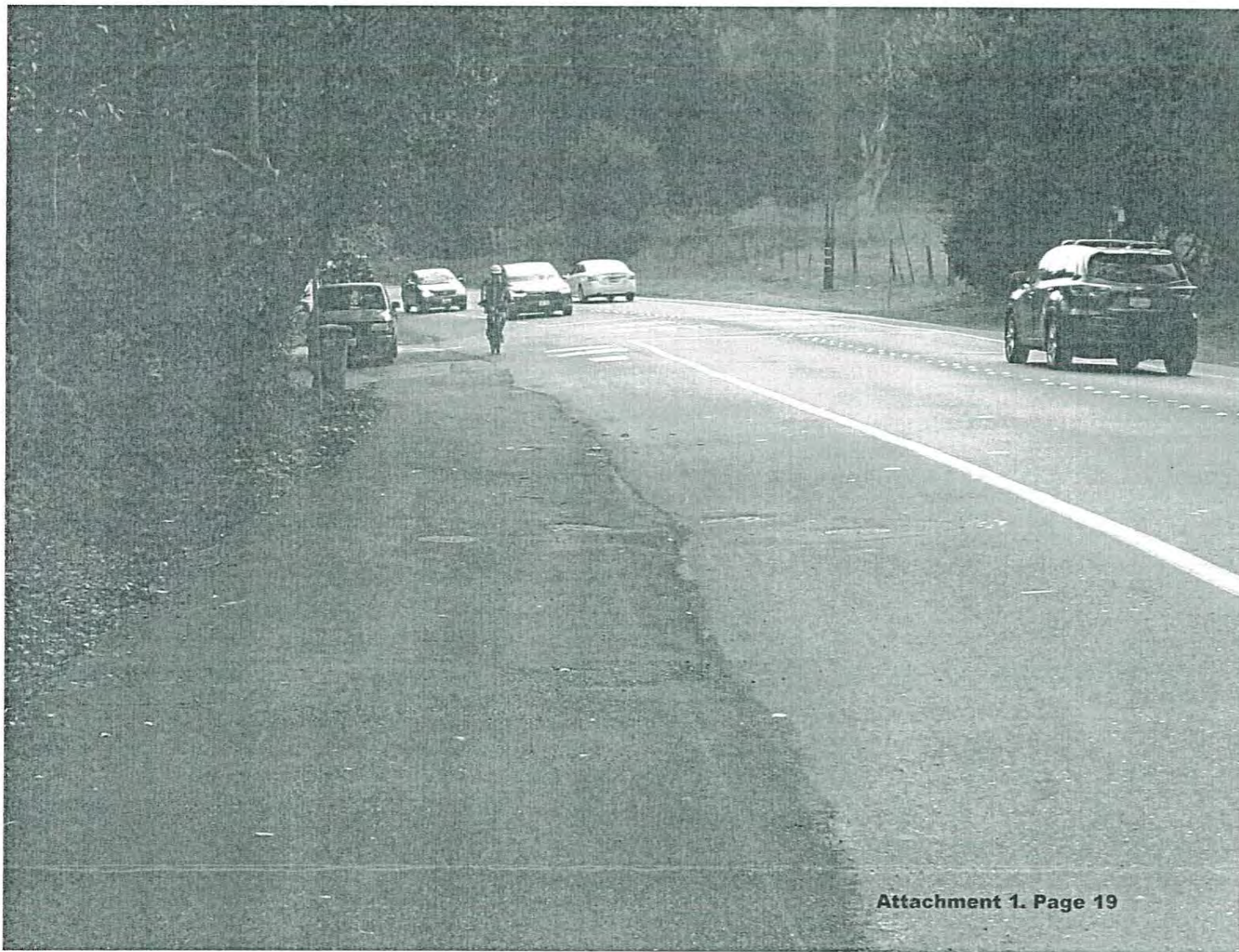


Aftermath of car going off the road on Alpine by Rural Lane, using county supplied safety net, Oct. 25 2015. The fence has still not been repaired.

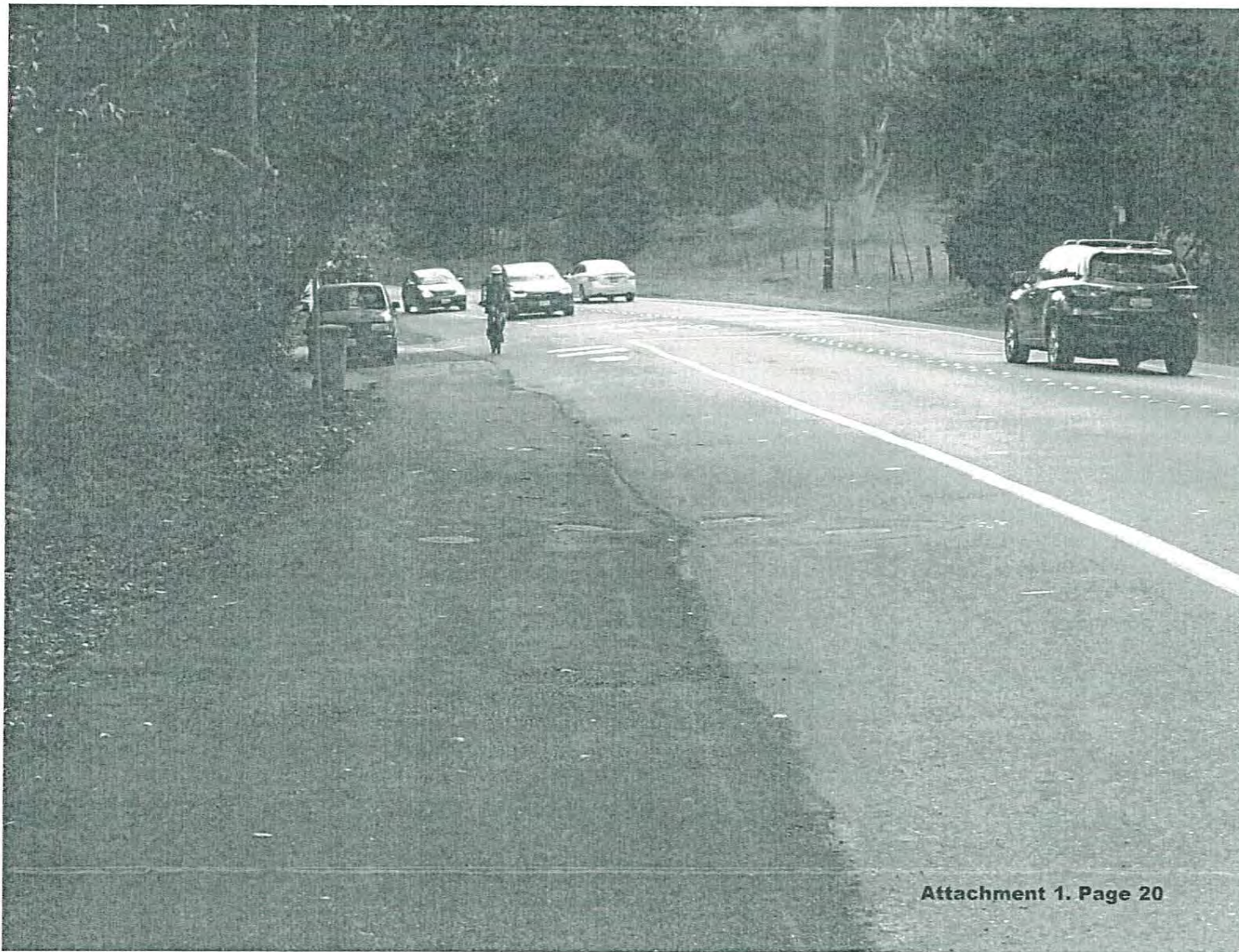


Car crashes while using Bike path going toward Junipero Serra, just past Rural Lane, Jun 2014.

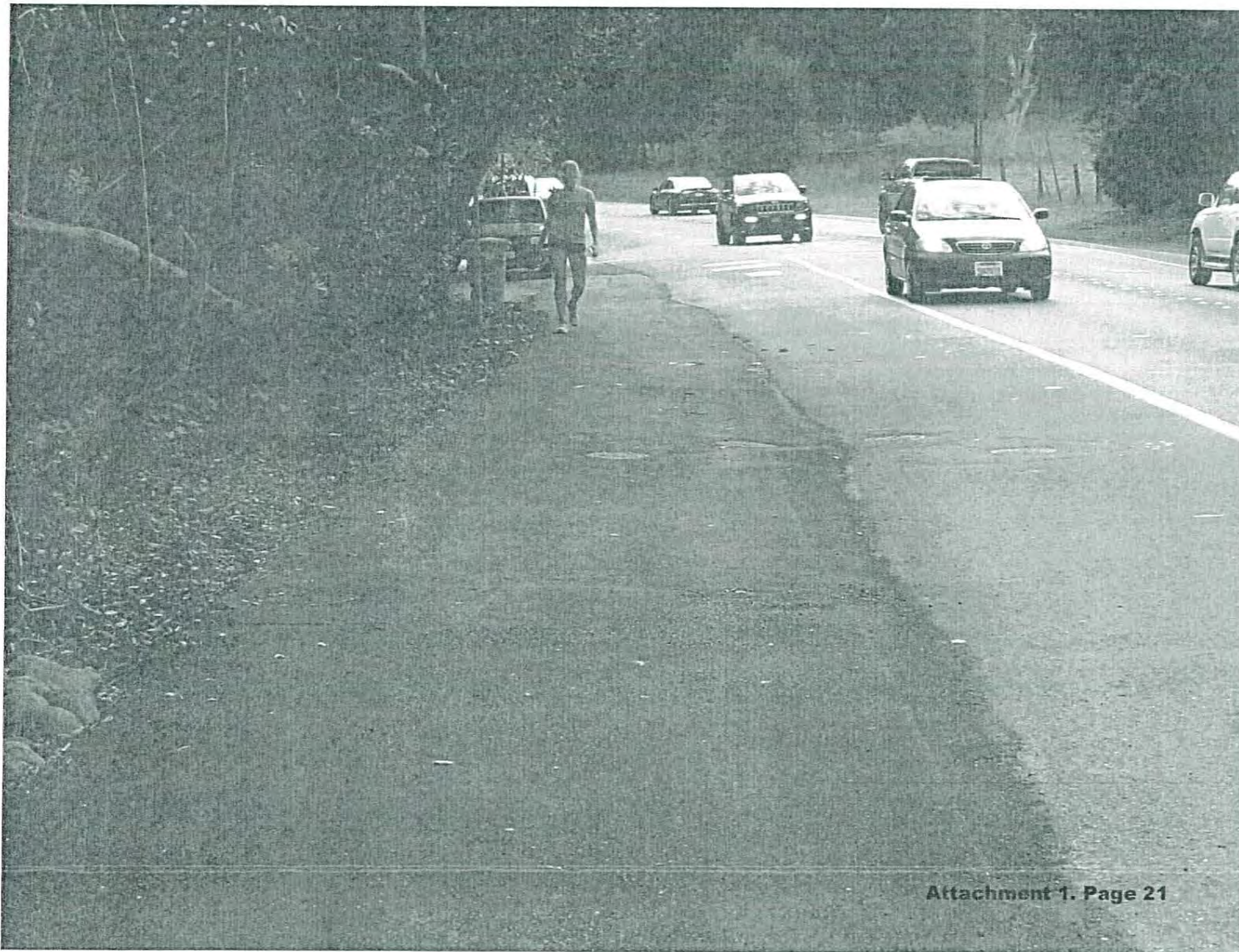




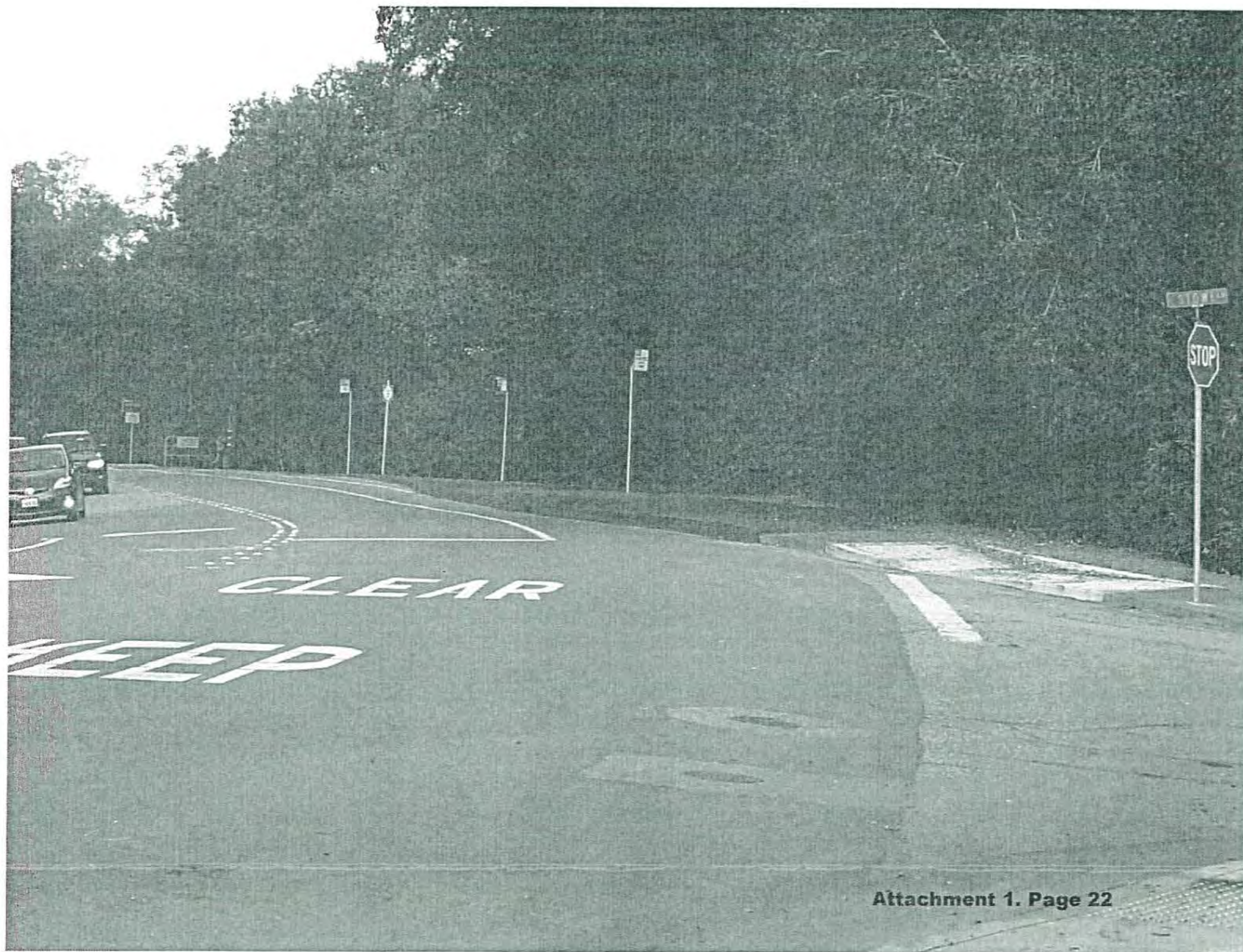
Attachment 1. Page 19



Attachment 1. Page 20



Attachment 1. Page 21



BICYCLE PROBLEMS BETWEEN BISHOP AND JUNIPERO SERRA

My Experience:

- Decades of living on Alpine
- Many years of dog walking,
- About 12 years of bicycle commuting and recreational cycling, during which time I have had several close calls because of various dangerous situations and conditions.

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Comments on Meeting (Agree with comments of others):

- Not enough time
- No prior posting
- Kimley Horn seemed ill-prepared and ignorant of prior history or actual physical facts.
- There was no explanation of how the study was prepared or analyzed.
- The computer modelling was ineffective because it reflected county mandated, unrealistic restrictions (garbage in, garbage out).

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Scope of Study Restricted to engineering.

- Did not address the part of Alpine within Menlo Park's jurisdiction which is where many of the problems lie.
- Added matters related to Ladera which is a totally separate issue, which confused the meeting.
- Did not address or ignored prior studies that contradict what was provided.
- Did not allude to possible non-engineering solutions that could be pursued.

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General Bicycle Issues:

- Cyclists generally have somewhat the same ingress/egress problems as drivers, but lack the acceleration potential.
- There has been a significant increase in traffic particularly over the last 5 years, with vehicles of all sorts taking over the bike lanes and sometimes the path.
- There is no way to cross Alpine safely. This could be helped by a cross walk at both Junipero Serra/Alpine and at the end of Alpine by the Buck Estate which would prevent cyclists veering through cars or using the pedestrian path.

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Bicycle Issues Between Bishop and Rural Lane:

- To exit a driveway or cul-de-sac heading to Ladera a cyclist does not have the acceleration to get across the road given the speed at which Menlo Park bound vehicles travel. When traffic is grid-locked and stationary in the Menlo-bound direction but speeding in the PV direction, it is extremely dangerous if not impossible. There are similar problems when the flow of traffic is reversed in the afternoon/evening.
- "Bike Lane" signs and on surface logos are insufficient and inadequate. There needs to be the green surfacing and signs need to be larger, put at eye level and kept free of overgrowth.
- The bike lanes, particularly on the Stanford lands side is too narrow in places and does not allow vehicles to keep the State mandated distance from the bicycles.
- Buffer zones are needed such as those put in by CalTrans by the 280 underpass.
- Double semis frequently veer into the bike lanes
- Cyclists traveling toward 280 are endangered by the fact that vehicles exiting driveways/cul-de-sacs have to accelerate sharply to take advantage of gaps in traffic. This acceleration often propels vehicles into the bike lane on the far side of Alpine.
- The very large and sometimes aggressive pelotons that take up not only the bike lanes but the roadway, can intimidate less experienced riders, forcing them off the road and sometimes causing crashes

200

- Cyclists and pedestrians are both imperiled by drivers using Stowe Lane for illegal U-turns. a "NO U-TURN " sign (if not demolished by a vehicle) might discourage that.

↑ 200
cont.

Bicycle Issues within Menlo Park's Jurisdiction Not Addressed:

- Cyclists going down Santa Cruz Ave and making a left onto Junipero Serra are at extreme risk between the two intersections, having to weave in between vehicles and having to line up in the middle lane where vehicles can also drive straight forward to Alpine.
- Suggestions to improve safety:
 - Making the middle lane also LEFT TURN ONLY would help this situation and make the impossibly short merge lane safer for both cyclists and drivers.
 - Add "Sharrows" in the middle lane
 - Put signage where people can actually see it, either above or below the traffic signal, not on the wall by the Buck Estate where nobody looks.
- The merge lane by the Buck Estate is too short and gives priority to the middle lane. This causes dangerous competition between drivers (especially when there is a truck) who often drive right into the bike lane.
- Another danger for cyclists is vehicles frequently make illegal U-turns at the Buck Estate's back entrance. Although this has been frequently reported to the MPPD, nothing has been done to prevent this by installing a barrier or erecting a "No U-Turn" signs. What makes it dangerous for cyclists is that the entrance is hidden from sight until the corner is rounded.
- On the other hand, cyclists going from Junipero Serra or Alpine to Sand Hill Road and towards Sharon Heights (or SLAC) via Santa Cruz Ave face a different set of challenges since they have to cross two lanes of traffic to get into the left-hand turn lane.
- Cyclists continuing straight through the intersection toward Menlo Park often find that their lane blocked or partially blocked by cars and/or trucks trying to turn down Sand Hill to the Hospital and cyclists wanting to turn right themselves are simply stuck in traffic. As a result, even experienced cyclists coming down Alpine are using the Menlo Park "trail" under the cantilevered section. Since this has a steep slope, has a sharp bend to go under Junipero Serra and is non-ADA compliant, this endangers pedestrians and other cyclists, particularly since speeds of 20 mph can easily be reached by just coasting. This part of MP's "trail" is too steep, also making it very difficult for small children or parents with attached child carriers or trailers to negotiate.

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Note:

There is a fire lane between Alpine and Sand Hill that runs over the 109 gas pipeline between the Buck Estate and the Stanford Hills subdivision. Years ago residents advocated for that to be a safe bike/pedestrian route. Terry Burnes refused to pursue that although that could have been a condition to the granting of a zoning change for the Buck Estate/Hewlett foundation. This, combined with a cross walk on Alpine could alleviate some problems.

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SUMMARY:

- This is but a short list of the main bike problems I have encountered. There is absolutely no point in doing an "engineering" study of the county section of Alpine Road without addressing that portion in Menlo Park's jurisdiction, and the adjacent problems associated with Sand Hill Road. Seems to me that this purported study was a waste of taxpayer's money.
- The main improvements needed are:
 - Reduced vehicle speed
 - Improved signage
 - Enhanced traffic enforcement
 - Green marking of all bike lanes and adding buffer zones where feasible

203

- Regular maintenance such as trimming of foliage, clearing of debris from bike lanes, sealing of cracks in pavement, especially by the Junipero Serra underpass
- Widening of bike lane on Stanford lands (west side of Alpine)

↑ 203
cont.

ILLUSTRATIONS:

Cars driving in the bike lane approaching my driveway, taken over a 15 minute period. These are some of the most blatant during that short time but I've witnessed/experienced far worse throughout the day.



From: Rimmy Malhotra
Sent: Wednesday, November 29, 2017 8:22 PM
To: Planning_plngbldg
Subject: Stanford General Use Permit comments

Hi,

I am a resident of Menlo Park, and my wife works at Stanford. While I believe that Stanford is an extreme positive to the economic well-being and health of our community that needs to be balanced by the strains it places on our community's resources.

I believe for Stanford to get the general use permit it requires, it should agree to much more extensive deployment of the Maguritte Shuttle, their campus shuttle, into the West Menlo Park community. Right now the shuttle only goes up sand hill road. It should go deeper along the Alameda, with more frequency. I believe many of the Stanford employee's that drive would then use this as an alternative. Also I believe they should give massive incentives to their employees to use the commute club, and subsidize zip car memberships. If they were to this a sizable amount of local traffic could be alleviated.

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Subject: FIX TRAFFIC FIRST

Dear SM County Board of Supervisors,

NO TO STANFORD EXPANSION.

WE ARE AT COMPLETE TRAFFIC GRIDLOCK FROM WILLOW TO UNIVERSITY IN EAST PALO ALTO.

Do not allow more growth in the East Palo Alto area. Due to intentional poor planning from the past, there is only two ways in and out of east Palo Alto at Embarcadero or University. This was purposefully done years ago to control the East Palo Alto population and prevent people from the east side from easily entering the west side. (Pls research old planning documents in county and Menlo Park files to confirm this. See more recent attached example.)

Due to the lack of egress, it now takes an EPA family an hour to drive their children to school in Palo Alto. WE DRIVE ONE HOUR FOR A 7 MILE ROUND TRIP. THIS IS CRAZY. It drastically effects our quality of life, ability to get to work, create businesses and children's sleep and study time. EPA had ran out of water; we could not even build to house our own people this last decade because of this lack of water. Now you ask that we have to give up our roads and have our quality of life deteriorated more so Stanford can build housing?

I IMPLORE ANY COUNTY OFFICIAL TO DRIVE FROM BEECH AND PULGAS AT 7:45 AM AND TRY TO GET TO ANY SCHOOL IN PALO ATLO. YOU WILL BE ABSOLUTELY SHOCKED TO HAVE TO WAIT 15-20 MINUTES AT ONE TRAFFIC LIGHT. ANY GOOD LEADER CAN EMPATHIZE WITH THEIR CONSTITUENTS. I SAY YOU ARE NOT A LEADER UNTIL YOU WALK IN THE PEOPLES' SHOES AND SEE/EXPERIENCE WHAT WE DO. BE LEADERSHIP.

I GIVE YOU THE EPA TRAFFIC CHALLENGE: I am asking that each of the county supervisors, and city counsel members, depart from Pulgas and Beech in EPA at 7:45 am and head toward ANY school located in Palo Alto and back to that starting point. Please clock your time then report back to me, the city of EPA and your constituents what you experienced. Must be a full school day - weekend and school breaks do not count. Words will not describe what you are about to experience. This cost you nothing and proves you actually care about the quality of lives of the people in this county - ALL THE PEOPLE. Once you experience the problem you will then be wise enough to visualize a remedy for the problem.

Then people wonder why EPA working families can't achieve more - thousands of lost hours of productivity and student study time lost in traffic. Its mathematical not rocket science. My family loses thousands of dollars a year in income because I am in traffic instead of working. I cannot open my own firm/business in EPA because traffic is crazy and transportation horrible so I commute to my company everyday in SF where people can access my office with public transportation. Stanford is privileged enough. How about championing the worker for once? Don't let Stanford siphon off more resources from the surrounding community. Time is a resource.

Everyone is so seduced by Facebook, Google, Stanford, Amazon, etc....they forget that there are hard working people who have to get to work and school, pay mortgages and spend time with their families. Our streets are flooded with this pass through traffic and pollution. Who will stand up for the people of East Palo Alto?

Please respond.

- Marcia Perez
3 Shorebreeze Court
East Palo Alto

415-297-6009

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Law Office of Marcia I. Perez
601 Montgomery Street, Suite 665
San Francisco, CA 94111
(415) 291-8122
Fax (415) 362-9022
PerezImmigrationLaw.Com

COMMUNITY MEETING
to inform the County of San Mateo's comments on the Draft Environmental Impact Report

Stanford General Use Permit Application
Wednesday, Nov. 29, 2017
7 p.m. to 8:30 p.m.
Oak Knoll Elementary School
1895 Oak Knoll Lane
Menlo Park, CA 94025
Spanish translation provided

STANFORD GENERAL USE PERMIT

Communities adjacent to Stanford may be impacted by the University's application to grow their campus by 2,275,000 sq. feet plus 3,150 units of housing in Santa Clara County.

The County of San Mateo invites your input on the comments it will submit to Santa Clara County in response to the Draft Environmental Impact Report. The report analyzes the impacts including:

- Housing
- Transportation
- Environmental and Community Resources

Written comments may be sent to plngbldg@smcgov.org
For more information call County of San Mateo's Office of Community Affairs: 650-363-1800

View the Stanford development application and Draft EIR at:
<https://www.smcgov.org/sites/default/files/Programs/Stanford/Pages/CurrentProjects.aspx>

East Palo Alto

The dominant factor in all Willows traffic problems is the cultural divide between the Menlo Park and less affluent East Palo Alto zone within the Willows. Concerns about crime, property values and cut through traffic all lead to East Palo Alto. A consultant hired to work with the Willows activists reported "There is little or no sense of community with neighbors in the University Circle area of EPA ... traffic with an origin in EPA is considered *through traffic*." (TJKM Transportation Consultants, 2/3/92)

Willows traffic activists live by and large on streets most frequented by EPA traffic: Chester, Durham, O'Keefe and Woodland.

The map (Fig 1) shows the high population density of EPA zone and the businesses at the Willow Rd ends of O'Keefe, Durham and Chester Streets that serve them. It should be no surprise that there are a high percentage of EPA residents travelling those streets. The Preferred Plan produced by the consultant and the Willows traffic activists would have blocked all vehicle traffic (except emergency vehicles) between EPA and MP, cutting them off from Willow Rd. This would have left approximately 2400 EPA residents in a bottle with one exit.

The Preferred Plan generated opposition from EPA and Menlo Park backed off with a sequence of less blatantly offensive plans. The plan which the City Council actually approved replaced the barriers with a bewildering maze of chokers, chicanes and traffic circles. In the words of the March 16, 1993 Staff Report "Its primary purpose is to make travel through the area difficult while not actually preventing it ... a system of devices which discourages or precludes travel through a specific area". Paul Collacchi (later a MP Council Member) stated in a letter to the City Engineer (March 3, 1993) "the plan is little more than a poorly disguised attempt to prevent the residents of EPA from entering Menlo Park. That was the *idée fixe* of the plan and has become the unalterable, unspoken value underlying it since its inception."

Cut Through Traffic

The City Transportation Division supports the activists' claims of dire cut-through traffic by publishing cut-through traffic measurements (staff report 04-072) based on the assumption that EPA residents are outsiders. They withheld results which showed that 40 to 50% of the alleged Willows cut through traffic originates in EPA. In the "trouble spots", Chester St for example, 80% of the alleged outbound AM cut through traffic originates in EPA.

Crime

A serious outbreak of gang warfare in EPA in '92 generated a sense that something has to be done. It was used to generate signatures on a petition asking for traffic control as a deterrent to crime. This launched the Willows Traffic Plan of '93 - '96. The gang activity was suppressed by extra law enforcement but the Willows Traffic plan had

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reached critical mass. Paul Collacchi had this to say about the petitioning process: "When circulating petitions, Willows Working Group members circulated petitions calling for measures to reduce crime ... The crime petition was often deliberately used as a "bait and switch" lead-in to the traffic control petition. Petitioners were often vague about the finality of the (traffic) plan and I my encounter with a petitioner I came away thinking that in fact a different plan was going to be offered (to the City Council for approval)".

In 2005, a spate of armed robberies at the La Hacienda market on Menalto. In 2003 it had been restructured to serve an EPA Hispanic clientele. As early as March 2003 it became the target of criticism for the traffic it supposedly generated. The robberies became a new argument for traffic controls "easy get-away routes may contribute to the store being a target" according to a flyer handed out at a protest demonstration 4/23/05.

In 2007, two shooting incidents generated renewed calls for traffic control for the purpose of crime control.

Continuing EPA phobia

Recent EPA-related events which have been used with varying success to panic Willows residents:

1. Development of University Circle – dire pronouncements of traffic flooding the Willows, but never a positive word about the elimination of liquor stores, bars, crummy apartments and the generally unwholesome environment known as "Whiskey Gulch".
2. Armed robberies of La Hacienda Market, which caters to the large Hispanic population of EPA. Certainly a serious problem, but there was more hysteria geared to shutting down the market and of course installing traffic obstacles than calm attention to security details, which eventually solved the problem.
3. Opening of IKEA (!!!!) – intense agitation by the traffic activists resulted in neighborhood flyers from the Transportation Staff reassuring the neighborhood that MP was tracking the situation and would protect them from the predicted traffic onslaught.
4. Creation of the NTMP. The activists took the prohibition of using the NTMP to redistribute neighborhood traffic patterns as a threat to their long term program of barring EPA. This is the only way to understand their intense lobbying to have every reference to inclusion of residents from other jurisdictions removed from the document. Likewise their intense lobbying against provisions that limited street closures to cases of over-riding safety concern. Likewise their intense lobbying against the requirement that proponents of traffic changes demonstrate support of a majority of the neighborhood. All of these provisions would interfere with their plans to close out EPA.
5. The two shooting incidents in '07, which the Willows activists used to link crime to traffic and to grab for themselves the right to speak for Willows Residents. The result is the current Willows Area Wide Traffic Study (think G. Bush and 9/11) designed to concentrate power in the most vocal residents - themselves.

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cont.

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The Willows Area Wide Traffic Study

In 2010 the City Council approved the RFP for the latest study, wisely stipulating that East Palo Alto Willows residents not be considered as cut-through traffic. In spite of this requirement, the Transportation Staff and the consultant TJKM came up with a plan clearly targeting EPA residents. While not actually blocking them from entering, it diverts them from streets of traffic activists (Chester, O’Keefe, Durham and Woodland) to devious routes via other Willows and Palo Alto streets. See Fig 2.

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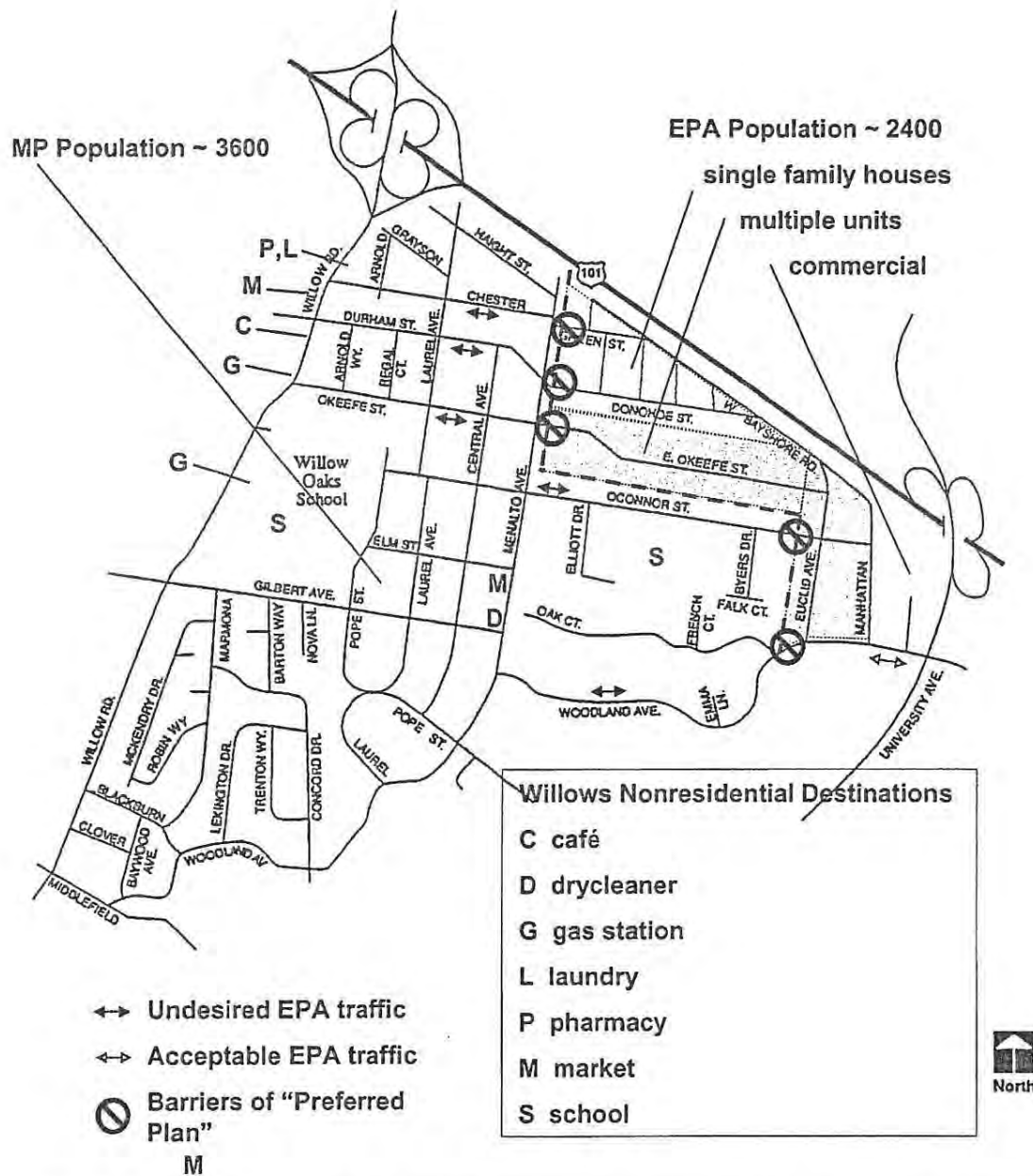


Fig 1. The Willows showing MP and EPA zones. Traditionally, EPA traffic uses Chester, Durham, O'Keefe and Woodland. "Undesired" and "Acceptable" EPA traffic refers to the preferences of Willows traffic activists, which led to the "preferred plan" of 1993 and the Willows Plan of 2011.



Fig 2.a. Diversion of traditional EPA Willows traffic by turn restrictions on Chester, O'Keefe and Durham

IMPROVEMENTS FOR VOLUME:

- Gateway Signs:
 - Chester St.
 - Durham St.
 - O'Keefe St.
 - Gilbert Ave.
 - Middlefield Rd.
 - Woodland Ave.
- Left Turn Restrictions on Willow Road During AM and PM Peak Hours:
 - Chester St.
 - O'Keefe Ave.
- Signal Coordinations:
 - Willow Rd.
 - Middlefield Rd.
 - University Ave.
- Reduced Lane Width/Edge Line:
 - Chester St.
 - O'Keefe St.
 - O'Connor St.
 - Gilbert Ave.
- Partial One Way Conversion (1 block) on Woodland Ave:
 - Chaucer St. to Menalto Ave.
 - Oak Ct. to Euclid Ave.
- Right Turn Restrictions
 - EB right turn on Durham St. at Menalto Ave.
 - WB right turn on Chaucer St. at Central Ave.

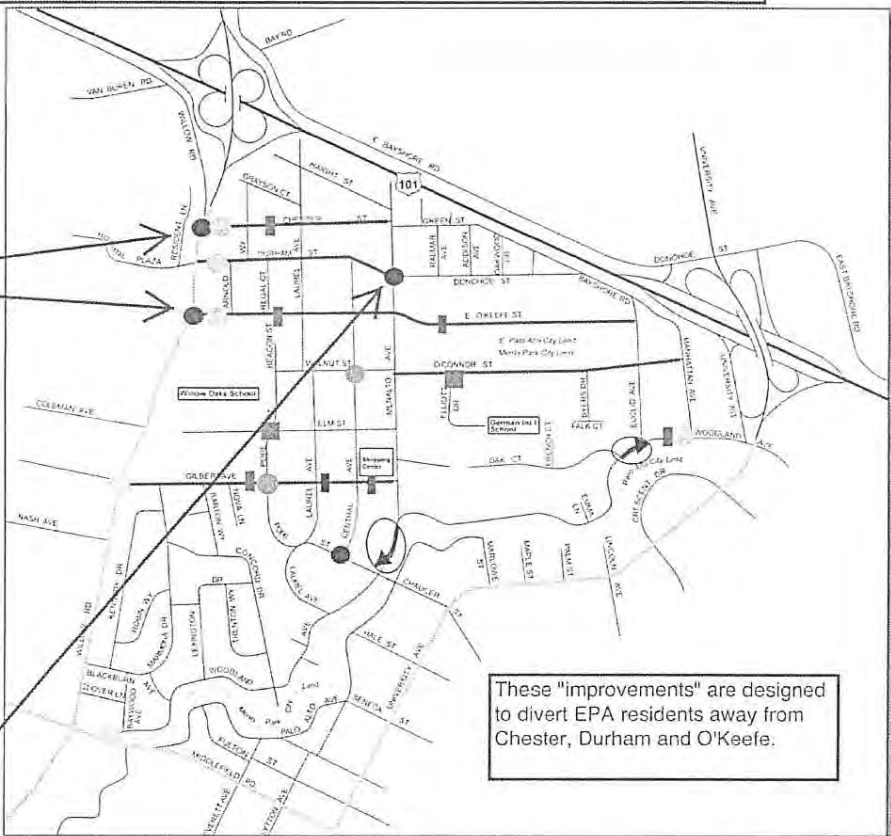




Fig 2.b. Diversion of traditional EPA Willows traffic by turn restrictions on Chester, O'Keefe and Durham

IMPROVEMENTS FOR VOLUME:

- Gateway Signs:
 - Chester St.
 - Durham St.
 - O'Keefe St.
 - Gilbert Ave.
 - Middlefield Rd.
 - Woodland Ave.
- Left Turn Restrictions on Willow Road During AM and PM Peak Hours:
 - Chester St.
 - O'Keefe Ave.
- Signal Coordination:
 - Willow Rd.
 - Middlefield Rd.
 - University Ave.
- Reduced Lane Width/Edge Line:
 - Chester St.
 - O'Keefe St.
 - O'Connor St.
 - Gilbert Ave.
- Partial One Way Conversion (1 block) on Woodland Ave:
 - Chaucer St. to Menalto Ave.
 - Oak Ct. to Euclid Ave.
- Right Turn Restrictions
 - EB right turn on Durham St. at Menalto Ave.
 - WB right turn on Chaucer St. at Central Ave.

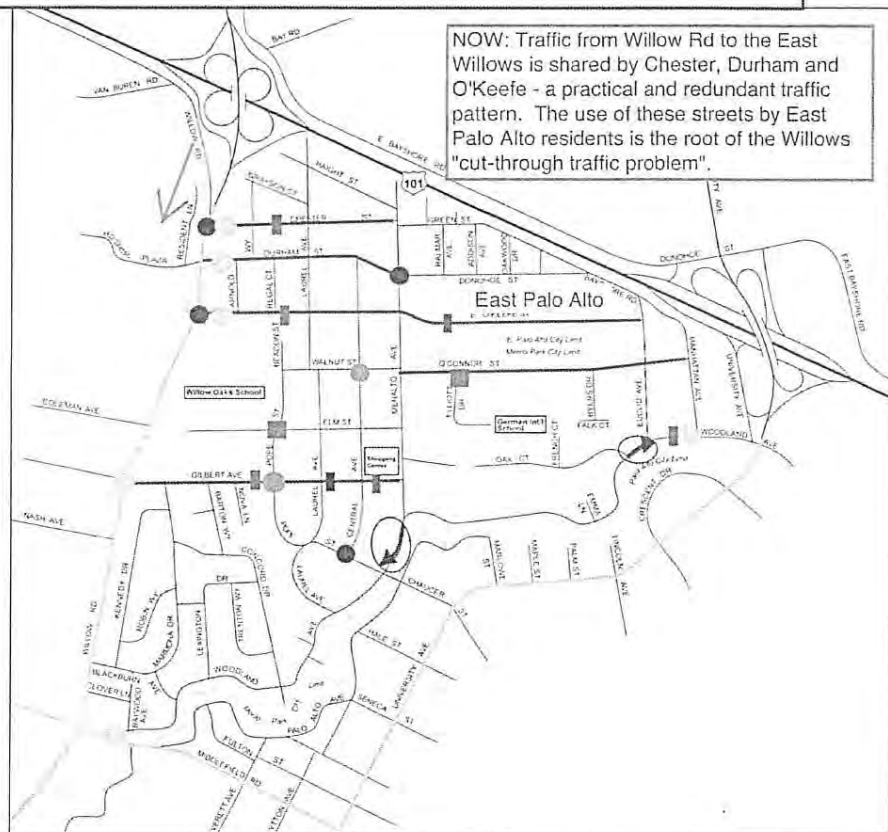
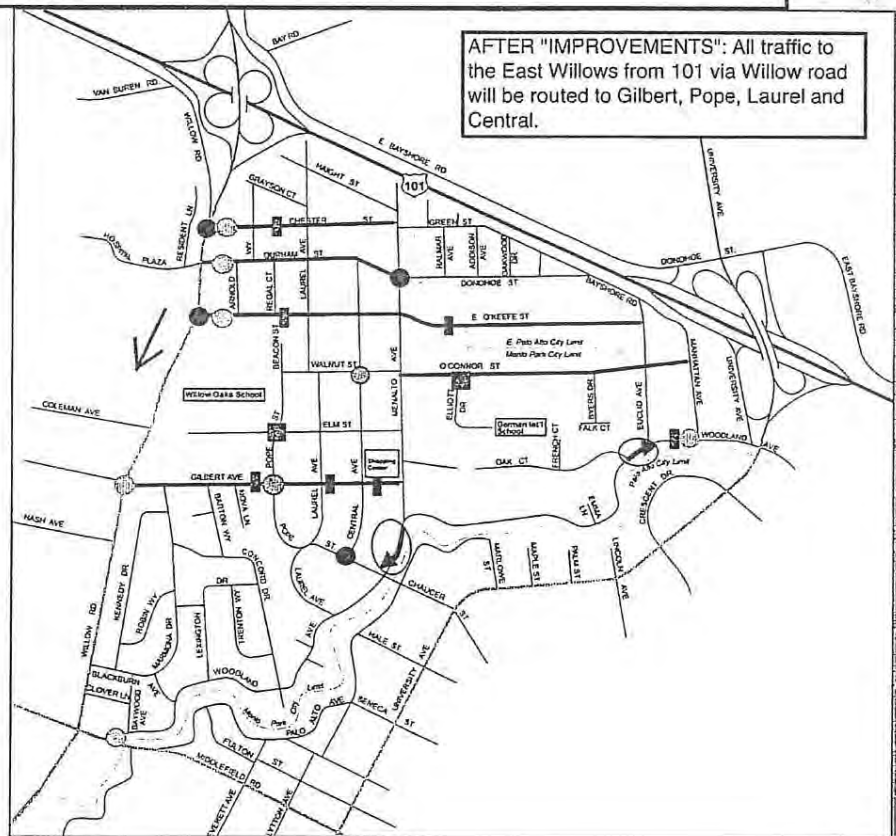




Fig 2.c. Diversion of traditional EPA Willows traffic by turn restrictions on Chester, O'Keefe and Durham

IMPROVEMENTS FOR VOLUME:

- Gateway Signs:
 - Chester St.
 - Durham St.
 - O'Keefe St.
 - Gilbert Ave.
 - Middlefield Rd.
 - Woodland Ave.
- Left Turn Restrictions on Willow Road During AM and PM Peak Hours:
 - Chester St.
 - O'Keefe Ave.
- Signal Coordination:
 - Willow Rd.
 - Middlefield Rd.
 - University Ave.
- Reduced Lane Width/Edge Line:
 - Chester St.
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- Right Turn Restrictions
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 - WB right turn on Chaucer St. at Central Ave.



5.2.1.17 Responses to Comments from County of San Mateo

A-SMC-1 On June 12, 2018 the County published the Recirculated Portions of Draft EIR, which included a new impact (Impact 5.17-1) that discussed the indirect impacts of off-campus housing associated with the Project.

Please also see Master Response 9: Population and Housing Methodology and Calculations, Topic 3: Off-Campus Households and Household Adjustment Factors, and Topic 5: Housing Linkage Ratio and Timing; and Master Response 10: Affordable Housing.

A-SMC-2 Please see responses to specific comments on housing raised in A-SMC-9, and A-SMC-33 to A-SMC-35, below.

Please also see Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps for an explanation of how study facilities were selected for evaluation in the Draft EIR.

Absent specific identification of intersections proposed for analysis in unincorporated San Mateo County in this comment, it is not possible to provide a specific response as to why an intersection did not meet the criteria for analysis in the Draft EIR. The following intersections in unincorporated San Mateo County meet the screening criteria and were included in the Draft EIR's analysis: Alpine Road and I-280 NB Ramps; Alpine Road and I-280 SB Ramp; and Sand Hill Road and I-280 SB Ramps.

With respect to concerns that the Draft EIR does not adequately identify specific impacts that will be experienced within unincorporated communities of San Mateo County, Stanford Weekend Acres is located along Alpine Road between I-280 and Junipero Serra Boulevard. Due to the connection to I-280, Alpine Road is an important link between the freeway and the cities of Palo Alto and Menlo Park. The existing daily volume is 26,000 vehicles per day. The operation of the roadway and intersections were included in the traffic impact analysis for the proposed 2018 General Use Permit.

The Fair Oaks and Menlo Oaks neighborhoods are located in the area bordered by Middlefield Road, Bay Road, Willow Road, and the Dumbarton Railroad tracks. Due to their location, roads interior to these neighborhoods would not be affected by Project traffic.

A-SMC-3 The amount of affordable housing fees and distribution of affordable housing funds are socioeconomic issues not required to be analyzed in the Draft EIR or mitigated under CEQA. Please also see Master Response 10: Affordable Housing, Topic 5: Geographical Distribution of Affordable Housing Funds.

A-SMC-4 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for detail on the mitigation measure implementation procedure.

A-SMC-5 Please see Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps for detail on the methodology used to select intersections and freeway segments for evaluation. Please see Master Response 13: Transportation, Topic 8: Neighborhood Street Impacts for detail on the methodology used to identify and evaluate traffic intrusion on neighborhood streets. A detailed discussion of the proposed Project’s potential impacts to traffic conditions in nearby neighborhoods is provided beginning on page 5.15-102 of the Draft EIR. The Draft EIR concludes that these impacts would be less than significant.

A-SMC-6 Table 14 of Appendix PHD of the Draft EIR, in Volume 2, page 623, shows the number of households that would be generated by Stanford affiliate type in each jurisdiction. While the Draft EIR and its appendices do not include the population in each unincorporated San Mateo County neighborhood (such as the number in Weekend Acres, Ladera, North Fair Oaks, Emerald Lake Hills, Princeton, La Honda, Highlands, etc.), they include the current percentage of households (Table 13) and the total number of households projected in unincorporated San Mateo County (Table 14), which is summarized as follows:

	Graduate Students	Postdoctoral Scholars	Faculty	Staff	Other Workers	Total
Total households projected off-campus	83	449	(102)	1,385	610	2,425
Households projected in unincorporated San Mateo County (%of total households and number of households)	3.0% - 2	3.4% - 15	6.8% - (7)	3.7% - 51	3.7% - 22	3.5% - 84

A-SMC-7 Based on the traffic analysis in the Draft EIR, additional roadway facilities connecting the campus to I-280 would not be needed to reduce the identified impacts to a less-than-significant level.

In its proposed 2018 General Use Permit application, Stanford states that it plans to continue to mitigate the transportation impacts of its additional development by implementing a transportation demand management program designed to achieve the No Net New Commute Trips goal, and to expand the Transportation Demand Management (TDM) measures designed to prevent an increase in new vehicle trips during the peak commute hours in the peak commute direction.²² Annual monitoring conducted by the County’s independent consultants concludes these programs were successful in achieving the No Net New

²² Stanford University, 2018 General Use Permit Application (see, e.g., pp. 3.13, 3.35).

Commute Trips standard under the 2000 General Use Permit. Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard demonstrates that during implementation of the 2000 General Use Permit, sustained increases in all-day trips at the campus gateways also have not been observed. Addressing potential vehicle increases through TDM programs is preferable to constructing infrastructure improvements because TDM programs have fewer negative effects on the physical environment. In addition, the benefits of programs to move commuters out of their cars and onto transit extend over a wider geographic area than infrastructure improvements targeted at an isolated road segment or set of intersections.

The Draft EIR recognizes that back-up mechanisms are needed if Stanford is not able to implement TDM programs to achieve the No Net New Commute Trips standard. Table 1 on page 5.15-84 of the Draft EIR identifies two intersections between I-280 and the Stanford campus where significant impacts could occur if the No Net New Commute Trips standard is not achieved: I-280 Northbound Off-Ramp/Sand Hill Road (Intersection #2); and Junipero Serra Boulevard/ Foothill Expressway/ Page Mill Road (Intersection #17). Table 1 also identifies physical improvements to each of these intersections that could be implemented to reduce the impacts to a less-than-significant level. The Draft EIR also recognizes that the impact may remain significant and unavoidable if funding mechanisms are not sufficient to collect contributions from other entities who might contribute traffic to these intersections, or in the case of Intersection #2, if the entities with jurisdiction over the intersection elect not to construct the improvements. Construction of a new transportation facility might provide an alternative means to reduce impacts at Intersection #2, and possibly at Intersection #17; however, this mechanism would result in far greater physical effects to the environment than the improvements identified in the Draft EIR due to the need to undertake substantial construction-related activities. Further, a new roadway connection to I-280 would require interchange approvals by Caltrans, such that this solution could not be assured and would be considered less certain than the improvements identified in the Draft EIR. Please see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

For all of these reasons, construction of a new transportation facility connecting Stanford to I-280 is not preferable to the mitigation measures identified in the Draft EIR.

A-SMC-8 Stanford currently supports public bus service to the East Bay, and Stanford reports that the university intends to continue to explore transit expansion options in connection with its efforts to achieve the no net new commute trips program under the 2018 General Use Permit.

Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for more information regarding tools available to

Stanford to achieve this standard. Stanford states that its transportation planning staff is willing to meet with San Mateo County staff to discuss any ideas San Mateo County has for transit expansion.

- A-SMC-9 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund, and Topic 4: Process for Distribution of Affordable Housing Funds.
- A-SMC-10 The intersection improvements identified in the Draft EIR draw heavily on mitigation measures from adopted plans and studies such as the County of Santa Clara’s Expressway Plan 2040 and the ConnectMenlo Final Environmental Impact Report. As stated at the end of Draft EIR Mitigation Measure 5.15-2 on page 5.15-90, the County Planning Office will use any trip fees collected from Stanford to fund the intersection improvements listed in Table 1 of this mitigation measure if it is feasible to do so. If it is not feasible to use the fees for the specified intersection improvements, the County will use the fees for other trip reduction programs in the local impact area to encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area.²³ The County Planning Office will decide how to use trip fees collected from Stanford when and if Stanford exceeds the no net new commute trip standard. The priority order for intersection improvements in the event Stanford does not achieve the no net new commute trips standard will be determined by the County Planning Office in consultation with affected jurisdictions, including San Mateo County. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.
- A-SMC-11 Please see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.
- A-SMC-12 By focusing on the peak hour, the impact assessment and mitigation approach reasonably are designed to address the highest, or worst-case impact that may occur. This is a traditional method for addressing and mitigating impacts to intersection, roadway and freeway congestion. Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading, Figures MR13-5 and MR13-6 show that the daily number of vehicles entering and exiting the campus at each of the campus gateways has not increased during implementation of the 2000 General Use Permit. There has been

²³ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

some fluctuation at two of the gateways during periods when nearby construction activity was occurring, which would have resulted in an increase in cut-through trips. However, the monitoring data do not indicate that an increase in the daily number of Stanford campus-related trips has occurred. The data indicate that the trip reduction programs that Stanford is implementing to achieve the no net new commute trips standard are having an all-day effect.

The Stanford Community Plan establishes a policy to measure the no net new commute trips standard during peak hours, as opposed to all day. Cordon count data are collected during two periods each year, for multiple days during each collection period. While the counts are taken on a 24-hour basis, additional steps must be taken to separate out trips from drivers who are passing through the campus and to separate hospital trips from campus trips. Logistically, it would be more difficult and time consuming to apply these processes to all 24 hours of data.

Stanford is moving to license plate reading technologies for parking permit enforcement, and that data will be available during the fall 2018 monitoring period to aid in identifying campus drivers who park in hospital lots, and hospital drivers who park in campus lots. The County's consultant who conducts the annual monitoring will vet the license plate data for the parking surveys against the windshield methodology used under the 2000 General Use Permit. At this point, Stanford does not believe it is feasible to use license plate reading technology for the purpose of conducting the campus cordon counts or identifying cut-through trips.²⁴ This is because using license plate readers to conduct the cordon monitoring would be more complicated than using the technology in parking lots, given the varying terrain and locations of the cordon gateways. However, the technology is being investigated by Stanford and the County, and Mitigation Measure 5.15-2 provides a process for changing technologies when they are available. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

- A-SMC-13 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary; and Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts.
- A-SMC-14 Of the three intersections identified in the comment, Table 1 on pages 5.15-85 and 5.15-86 of the Draft EIR discloses that Intersections #2 and #59 could experience significant impacts due to the Project if the no net new commute trips standard is not achieved. In addition to the no net new commute trips mitigation

²⁴ See Appendix TRF-MISC in this Response to Comments Document.

program, Table 1 also identifies physical improvements at these two intersections that would reduce the Project's impact to a less-than-significant level. Both of these intersections are located outside the County's jurisdiction and, therefore, the County cannot guarantee that the improvements would be implemented in a timely manner such that the Project's impact is mitigated. In such case, the impact would remain significant and unavoidable. Intersection #24 (I-280 Northbound Ramps/ Alpine Road) would not have a significant impact due to the Project and, therefore, no mitigation measure is proposed.

Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for additional discussion on intersection impacts and mitigation measures.

A-SMC-15 The existing conditions LOS calculations/results presented in the Draft EIR adhere to the VTA TIA Guidelines and were conducted using Traffix 8.0. LOS calculations performed for this intersection as part of other, non-project-related efforts may have been calculated using different software, analysis years, traffic counts, or other model inputs and parameters.

The significance thresholds defined in the Draft EIR on page 5.15-57, state an impact occurs at an unsignalized intersection when the intersection goes from LOS E or greater to LOS F, or when the intersection operates at LOS F and meets the peak hour signal warrant. Based on the LOS results from Traffix 8.0, a significant impact would not occur at this location in the AM or PM peak hour and, therefore, no mitigation measure is proposed.

A-SMC-16 As stated on Draft EIR page 5.15-85, if the no net new commute trips standard is not achieved, the proposed Project would contribute funding that could be applied to the addition of a second westbound left-turn lane and second receiving lane on the south leg of the intersection at Middlefield Road and Marsh Road. However, because this improvement depends on the actions of the City of Menlo Park and Town of Atherton, and 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 this significant cumulative impact is mitigated. Therefore, the impact would remain significant and unavoidable.

A-SMC-17 Resident non-commute trips were included in the traffic analysis. Table 5.15-11 on page 5.15-64 of the Draft EIR identifies the trip generation rates for campus residents in both the commute and non-commute directions. In addition, there are separate figures showing the trip distributions for the commuters to campus (Figure 5.15-6) and campus residents (Figure 5.15-7).

Please also see Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution.

- A-SMC-18 The Draft EIR addresses the impacts of development on the Stanford University campus, not the impacts of development at the Medical Center or at other off-campus sites. The reference to 80 percent of the traffic within the cordon area coming from the Medical Center cannot be located in the 2014 Monitoring Report. As described on page 7 of the 2014 Monitoring Report, cut-through traffic ranged from 10.5 percent to almost 13 percent. Cut-through traffic would not be exclusive to the Medical Center, but regardless, it was well below the referenced 80 percent in the comment.
- Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary; and Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts.
- A-SMC-19 The comment is correct. As specified by Stanford Community Plan Policy C-8, the County Planning Office recognizes participation by Stanford in off-campus trip reduction efforts and credits reduced trips towards Stanford's attainment of the no net new commute trips standard.
- A-SMC-20 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information regarding the application of trip credits in the context of the no net new commute trips policy.
- A-SMC-21 Stanford Hospital and Lucile Packard Children's Hospital are located in and regulated by the City of Palo Alto. Stanford academic campus development does not increase vehicle trips between the campus and the Hospitals, because of the geographic proximity of the facilities. In other words, there is no need to drive between the campus and the Hospitals. Therefore, the no net new commute trips standard does not establish a performance standard pertaining to the Hospitals. For this reason, vehicle trips associated with the Hospitals are not included in the campus cordon counts used to measure compliance with the no net new commute trips standard.
- Removal of trips to and from the Hospitals may, however, result in credits toward meeting the no net new commute trips standard. Stanford Community Plan Policy SCP-C 8 establishes a policy to credit Stanford's participation in off-campus trip reduction efforts that benefit the streets surrounding the campus toward Stanford's achievement of the no net new commute trips standard. Therefore, under the currently approved trip credit program, the County credits Stanford with reduction in peak hour, peak direction vehicle trips to and from the Hospitals through the University-supported Marguerite shuttle and the Commute Club.
- Trip reduction credits for riding the Marguerite shuttle and participation in the Commute Club by Hospital employees do not overlap with mitigation for the Stanford University Medical Center Replacement and Renewal Project. The SUMC project approvals required the Hospitals to provide annual Go Passes

(free train passes) to hospital employees; the project approvals did not require payment of Commute Club benefits.²⁵

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for additional information regarding the application of trip credits in the context of the no net new commute trips policy.

A-SMC-22 Gateway #2 is the Stockfarm Road entrance. The all-day annual monitoring conducted by AECOM for the County captured that the total number of cars crossing the cordon at Stockfarm Road each weekday - including Stanford and non-Stanford cars - has fluctuated during buildout of the 2000 General Use Permit. As shown in the table below, daily vehicles using Stockfarm Road as for ingress or egress has fluctuated over the years, similar to the trends in the economy. However, the all-day campus cordon traffic has remained stable (see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading).

DAILY VEHICLES AT STOCKFARM ROAD CORDON: 2004 TO 2016

Cordon Count Year	Daily Count	Cordon Count Year	Daily Count
2004	7,484	2011	5,755
2005	11,663	2012	5,958
2005	9,139	2013	5,871
2007	8,156	2014	10,519
2008	7,902	2015	4,960
2009	5,788	2016	8,524
2010	5,865		

SOURCE: County of Santa Clara, 2004-2016

Although 2005 and 2014 had the highest ADT during the monitoring years, it should be noted that those were years of abnormal traffic patterns passing through the cordon gateway due to large construction projects outside of the academic campus. In 2005, Sand Hill Road was under construction and the number of non-Stanford vehicles cutting through Stockfarm Road was high because of traffic diversion during construction. Similarly, construction at SUMC has altered traffic patterns on the Sand Hill Road approach to the campus.

Regarding the Page Mill Road bike improvement, it is assumed that this project would provide a less stressful bicycle approach for commuters coming from that side of campus. The bicycle projects on Oak Grove Avenue and on Alameda de las Pulgas are proposed to provide a similar less-stressful bicycle approach on the west side of campus. These projects are described in detail in Chapter 8, Special Considerations, of the Draft EIR. Stanford has proposed funding of these

²⁵ Please see <https://www.cityofpaloalto.org/civicax/filebank/documents/22635>.

projects, but they would require planning and environmental work by the corresponding jurisdiction.

- A-SMC-23 Mitigation Measure 5.15-2 has been revised to clarify that the priority order for funding intersection improvements will be determined by the County Planning Office in consultation with the affected jurisdictions. It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.
- A-SMC-24 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals for a discussion of the use of a Program EIR and subsequent approvals.
- A-SMC-25 Draft EIR Mitigation Measure 5.15-1 discussed on pages 5.15-72 and 5.15-73 addresses maintenance of safe pedestrian and bicycle access. Mitigation Measure 5.15-1 also requires use of truck routes designated by the cities of Palo Alto and Menlo Park. In response to this comment, this measure is modified to also require use of truck routes designated by the County of San Mateo. Please see Chapter 2 in this Response to Comments Document for clarifying text added to Draft EIR Mitigation Measure 5.15-1.
- A-SMC-26 The comment is noted; no response is required.
- A-SMC-27 Table 5.15-41 on page 5.15-153 of the Draft EIR presents VMT generation with and without Stanford students as workers. The primary calculation includes students as workers because college students behave like workers in the sense that they attend school on a regular basis, as a worker would attend a job on a regular basis. Just as some Stanford faculty and staff live on the campus, and travel to work by foot or bicycle, many Stanford students also live on the campus and travel to school by foot or bicycle. A VMT analysis does not pertain exclusively to trips by off-site commuters. If that were the case, there would be no recognition that onsite housing reduces trip length and affects trip mode. For resident students, VMT for “non-work” trips is also included.

The Draft EIR shows that if students are not included in the analysis the average daily VMT in 2035 would be 7.11 VMT/worker as compared to 4.53 VMT/worker if students are included. In either case, the daily average would be well below the significance threshold of 13.75 VMT/worker.

Please also see Master Response 13: Transportation and Traffic, Topic 10: Vehicle Miles Traveled for additional detail on the VMT analysis.

- A-SMC-28 The purpose of a VMT analysis is not to measure or evaluate congestion on the roadways, but rather to measure the total miles traveled associated with the project. SB 743 and the changes to CEQA are designed to consider VMT rather than level of service because VMT directly relates to environmental factors such as air quality and greenhouse gases. In addition, mitigation for VMT focuses on getting people out of their cars, which in turn can have a substantial effect on reducing roadway congestion.
- A-SMC-29 As described on pages 5.15-144 and 5.15-145 of the Draft EIR, the Governor's Office of Planning and Research (OPR) recommends using a regional average for home-based work trips (commuters) and the lower of the county average or regional average for residents.²⁶ This guidance was used in selecting the thresholds for the analysis. The County of Santa Clara has not adopted its own significance criteria for VMT. Please refer to Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled.
- A-SMC-30 The annual VMT analysis used to inform air quality, energy and greenhouse gas impacts does include growth factors for non-academic trips. In Draft EIR Appendix VMT Fall 2035 Project Conditions (Appendix A of Appendix VMT, table presented on page 6 of 6), assumptions regarding the growth in these trips is shown in Column K. These growth factors were developed based on the increased enrollment, number of beds added, or increase in the size of academic space depending on the trip type or activity.
- Delivery and visitor trips are not included in the VMT analysis used to assess transportation impacts. The proposed Project does not have any attributes that would tend to increase VMT per delivery trip. While the number of delivery trips may increase with population growth, the trip lengths associated with those trips would not be expected to increase due to the Project. Per worker and per resident VMT largely acts as a proxy for visitor trips. A project's location in a low VMT region near transit would tend to reduce VMT per visitor trip compared to a project located more distant from transit. The per worker and per resident VMT analysis for the proposed Project demonstrates that the project is sited in a location with low VMT compared to regional averages.
- A-SMC-31 Information on the CRG is available on the County's website at: <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/StanfordCRG.aspx>. As outlined in the Stanford Community Plan, Policy SCP-GD (i) 7, the CRG is comprised of 8-12 persons selected by the County Planning Office in consultation with the County Supervisor for the Fifth Supervisorial District. The CRG meets at least quarterly and serves as a mechanism for exchange of information and perspectives on Stanford development issues, but has no formal role as an advisory body.

²⁶ See <http://opr.ca.gov/ceqa/updates/sb-743/>.

- A-SMC-32 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary. Please also see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how travel demand forecast for growth outside the Project site was developed for the Draft EIR, including for the Stanford Redwood City campus.
- A-SMC-33 Under CEQA, potential increases in housing costs and displacement of residents are socioeconomic impacts. Nevertheless, on June 12, 2018, the County elected to publish Recirculated Portions of Draft EIR that included two new alternatives to the proposed Project (Additional Housing Alternatives A and B) for the purpose of comparison and to assist the public and decision-makers in understanding the implications of the construction of higher levels of housing on the Stanford campus, and to allow the County the option to select one of these alternatives at the conclusion of the CEQA process. See Master Response 8: EIR Alternatives. The Recirculated document also identified a new significant Project impact (Impact 5.17-1) related to off-site environmental impacts associated with the construction and/or operation of off-site housing. See also Master Response 10: Affordable Housing.
- A-SMC-34 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.
- A-SMC-35 The County published an Affordable Housing Fee Nexus Study on April 5, 2018.²⁷ Please also see Master Response 10: Affordable Housing.
- A-SMC-36 As explained in the Draft EIR and further in Master Response 7: Flooding/Detention, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, no additional large-scale upstream detention facilities to attenuate and manage flows in San Francisquito Creek are required to reduce impacts of the proposed 2018 General Use Permit.
- However, as discussed in Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed, the County and Stanford will continue to collaborate with the relevant public agencies and other interested parties on planning efforts to address flooding issues in the San Francisquito Creek watershed. This includes consideration alternatives for constructing additional detention basin improvements on Stanford lands within the Project site (e.g.,

²⁷ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Lagunita, Felt Reservoir) and on other Stanford lands outside the Project site (e.g. Searsville Reservoir).

- A-SMC-37 The Draft EIR Impact 5.9-6 explains that each individual project that would occur under the proposed 2018 General Use Permit would be required to develop a drainage plan that complies with the County's drainage design standards and the requirements of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) including flow control, and National Pollutant Discharge Elimination System (NPDES) Provision C.3 requirements for storm capacity minimums. The County's drainage design standards require that project storm drainage infrastructure be designed to adequately convey all runoff from peak storm events. Any potential increases in stormwater runoff resulting from additional impervious surfaces must be detained to ensure peak flows do not result in on-site or downstream flooding.

The Draft EIR also explains that the proposed 2018 General Use Permit would not contribute to peak stormflows in San Francisquito Creek because sufficient remaining on-site detention capacity would exist to sufficiently handle peak runoff from the increased amount of impervious surfaces projected under the 2018 General Use Permit. Because Stanford would not contribute to additional peak flow, there would be no Project contribution to flooding in San Francisquito Creek. As such, development under the 2018 General Use Permit would not cause downstream flooding, nor would it contribute to cumulative downstream flooding. Please see also Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities; Topic 2: Monitoring of Stanford's Detention Capacity, and Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit.

- A-SMC-38 As explained in Master Response 7: Flooding/Detention, Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event, Stanford's detention facilities for the San Francisquito and Matadero watershed are designed to attenuate the peak runoff flow rates from all storms ranging from the 10-year recurrence interval storm through and including the 100-year storm. The detention basins' volume/capacity are sized so that they contain the runoff for all such storms up to and including the 100-year storm, before they fill.

Because development under the Project would not contribute to additional peak flows to the creek during storms from the 10-year recurrence interval up to the 100-year event, there would be no contribution to flooding in the creek. As such, development under the 2018 General Use Permit would not cause downstream flooding, nor would it contribute to cumulative downstream flooding. Since no Project or cumulative impact is identified, no mitigation is required under CEQA.

A-SMC-39 Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7 includes a detailed analysis of Project's impacts on the public police and fire protection services. Please see Draft EIR Section 5.14, Recreation, Impact 5.14-1 and Impact 5.14-2 which provides a detailed analysis of the Project's impacts on parks and recreation facilities. See also responses that follow below regarding effects on public services and parks.

With respect to libraries, as explained on Draft EIR, Section 5.13 Public Services, page 5.13-12, finds that given the extensive on-campus library facilities, it is highly unlikely that the increased student and faculty population to be accommodated under the proposed 2018 General Use Permit would necessitate the need for new off-campus public libraries.

A-SMC-40 Please see Section 5.14, Recreation, Impact 5.14-1 and Impact 5.14-2 which provides a detailed analysis of the Project's impacts on parks and recreation facilities.

The Recreation section of the Draft EIR acknowledges that Stanford affiliates may use parks, open space and recreational facilities in San Mateo County (p. 5.14-2) and identifies several of those facilities on Figure 5.14-2. For purposes of analyzing the Project's physical impacts on off-campus local and regional parks, major open space areas, trails, and recreation facilities, the Draft EIR focused on facilities that would most likely be used by the Stanford population, which were those in Palo Alto and Menlo Park because these cities are closest to the project site.

Please also see Response to Comment A-PA-62.

A-SMC-41 Impacts to fire protection, emergency medical and/or police protection services, including from increased traffic congestion is addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.

Please also see Response to Comment A-PA-57, above, and Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

With respect to mutual aid agreements, these are discussed in Draft EIR Section 5.8, Hazards and Hazardous Materials (page 5.8-5), as it relates to mutual aid for combating wildland urban interface fires; and further in Draft EIR Section 5.13 Public Services as it relates to mutual aid for general fire protection (pages 5.13-1 to 5.13-2 and 5.13-8). The Draft EIR also discusses agreements Stanford maintains with the County of Santa Clara for police services (page 5.13-3); and with the City of Palo Alto for fire protection and rescue, and

emergency dispatching services (pages 5.13-2 and 5.13-4). There are no significant environmental impacts identified in the Draft EIR associated with increased demand for mutual aid.

- A-SMC-42 Draft EIR Section 5.11, Noise and Vibration, Mitigation Measure 5.11-1 (Construction Noise Control Measures and Noise Control Plan for Off-site Receptors) specifies that if construction would be within 150 feet of off-site sensitive receptors, Stanford shall employ noise attenuation measures to achieve the performance standard specified in the measure. The noise attention measures shall be described in a Noise Control Plan, which include a requirement that the equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, etc.); this would apply to some of the construction trucks using off-site roadways in adjacent jurisdictions, including San Mateo County.

Transportation and Traffic, Mitigation Measure 5.15-1 (Construction Traffic Control Measures) has been revised to specify that Stanford shall 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. This would ensure Project construction trucks, and related noise and vibration effects, would be on routes established by applicable jurisdictions for use by trucks, and avoid construction truck traffic travel and related effects within local residential neighborhoods.

- A-SMC-43 As discussed in the Draft EIR, Chapter 2, Introduction, the County Board of Supervisors must certify the Final EIR before making a decision to approve the Project. Prior to approval of a project for which the EIR identifies significant environmental effects, CEQA requires the adoption of Findings of Fact (CEQA Guidelines, Sections 15091 and 15092). If the Findings of Fact identify significant adverse impacts that cannot be mitigated to less-than-significant levels, a statement of overriding considerations for those impacts would be adopted at this time (CEQA Guidelines, Section 15093(b)).

- A-SMC-44 The comment is acknowledged. The County Board of Supervisors may consider this approach when it decides whether, and under what conditions, to approve the Project. See also Master Response 4: Environmental Review Process, Topic 1, Use of Program EIR and Subsequent Approvals; and Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

- A-SMC-45 Due to the lack of specificity in the general comment about increased traffic and congestion, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR, Section 5.15, Transportation and Traffic which describes traffic conditions under existing and 2018 baseline conditions, and

addresses all Project and contribution to cumulative traffic impacts, including in local residential areas.

Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, Topic 6: No Net New Commute Trips Standard, and Topic 8: Neighborhood Street Impacts.

- A-SMC-46 Due to the lack of specificity in this noise comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.11, Noise and Vibration which describes the existing and 2018 baseline noise environment; and addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project, including from trucks,

- A-SMC-47 Due to the lack of specificity in this traffic comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

- A-SMC-48 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

- A-SMC-49 Please see Master Response 10: Affordable Housing, Topic 1: Affordable Housing Need and Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

- A-SMC-50 Impacts to emergency vehicles, including from increased traffic congestion is addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.

Please also see Master Response 12: Public Services, Topic 1: Emergency Access and Response Times.

A-SMC-51 to A-SMC-52

Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and safety impacts associated with the construction and operation of the proposed Project, including in local neighborhoods.

Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

A-SMC-53 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.2 Air Quality, which addresses all Project and contribution to cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.

A-SMC-54 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.2 Air Quality, which addresses all Project and contribution to cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.

Issues raised regarding quality of life and socialization are not related to the adequacy of the Draft EIR. Social effects are not part of an environmental analysis, but are considered by the decision-makers during the approval process. Please see Master Response 1: Non-CEQA Comments.

A-SMC-55 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Nevertheless, the Draft EIR discloses all off-site Project and contribution to cumulative impacts, including in surrounding cities, and mitigates impacts in those locations to the extent feasible.

A-SMC-56 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project.

- A-SMC-57 Please see Master Response 3: General Comments on EIR and Environmental Topics and Master Response 10: Affordable Housing, Topic 1: Affordable Housing Need.
- A-SMC-58 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative pedestrian safety impacts associated with the construction and operation of the proposed Project on study area roadways.
- Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.
- A-SMC-59 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please also see Draft EIR, Section 5.2 Air Quality, which addresses all Project and cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.
- A-SMC-60 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please also see Draft EIR, Section 5.15 Transportation and Traffic, which addresses Project and contribution to cumulative transportation impacts; and Section 5.11, Noise and Vibration, which addresses Project and contribution to cumulative noise impacts, associated with the construction and operation of the proposed Project.
- A-SMC-61 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative vehicle and pedestrian safety impacts associated with the construction and operation of the proposed Project on study area roadways.
- Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, and Topic 10: Bicycle and Pedestrian Analysis.
- A-SMC-62 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative pedestrian safety impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

A-SMC-63 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Nevertheless, the Draft EIR discloses all off-site Project and contribution to cumulative impacts, including in surrounding cities, and mitigates impacts in those locations to the extent feasible.

A-SMC-64 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, the Draft EIR considered all applicable Project populations, including students, faculty and support staff, as applicable in the analysis of environmental impacts.

A-SMC-65 Two metrics are used to measure transportation impacts of the proposed Project, Level of Service (see Impact 5.15-2 and Impact 5.15-9) and VMT (see page discussion starting on page 5.15-144 of the Draft EIR). Please see Master Response 3: General Comments on EIR and Environmental Topics.

Please also see Master Response 13: Transportation and Traffic, Topic 1, Method for Identifying Study Intersections, Freeway Segments, and Ramps, Topic 6: No Net New Commute Trips Standard, and Topic 7: Average Daily Traffic and Peak-Hour Spreading.

A-SMC-66 Impacts to fire protection services, including from increased traffic congestion is addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

A-SMC-67 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, and its various topics.

A-SMC-68 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Nevertheless, the Draft EIR discloses all off-site Project and contribution to cumulative impacts, including in surrounding communities, and mitigates impacts in those locations to the extent feasible.

A-SMC-69 The Draft EIR discusses traffic conditions on I-280 under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative impacts to freeway facilities, including I-280, are addressed in the Draft EIR, Section 5.15, Transportation and Traffic.

A-SMC-70 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

A-SMC-71 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps, Topic 6: No Net New Commute Trips Standard, and Topic 7: Average Daily Traffic and Peak-Hour Spreading.

A-SMC-72 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, and Topic 6: No Net New Commute Trips Standard.

A-SMC-73 Regarding the comment made about the motivation for expansion, this comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Regarding the comment made that the boundary lines do not represent the true impacts that this project will have on the community, due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Nevertheless, the Draft EIR discloses all off-site Project and contribution to cumulative impacts, including in surrounding communities, and mitigates impacts in those locations to the extent feasible.

A-SMC-74 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR Section 5.13, Public Services, which addresses the project impact to public schools.

Please also see Master Response 12: Public Schools.

A-SMC-75 Based on historical development patterns at Stanford, development is expected to occur incrementally over the duration of the proposed 2018 General Use Permit. There may be periods when greater construction would occur compared to the average, such as if multiple construction projects overlap with each other. The Draft EIR analysis, where appropriate, presents conservative assumptions about the overall types and level of activities that would be anticipated under the proposed 2018 General Use Permit, which tends to overstate project construction and operational impacts. For example, in the Draft EIR Air Quality section, the peak construction scenario for estimating criteria air pollutants was derived from one of the largest construction projects to occur at Stanford under the 2000 General Use Permit - the EV Graduate Residences. Similarly, the Air Quality health risk assessment screening assumptions were based on the EV Graduate Residences project. In addition, all mitigation measures in the Draft EIR, including those for traffic and air quality, were developed in consideration of varying construction and operational conditions, including a range of construction magnitudes, at the campus.

A-SMC-76 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However please also see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions, and addresses all Project and contribution to cumulative traffic impacts

associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic.

A-SMC-77 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative vehicle and pedestrian safety impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

A-SMC-78 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions, and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic.

A-SMC-79 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative impacts to pedestrian safety associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

A-SMC-80 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and safety impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

- A-SMC-81 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

- A-SMC-82 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Please also see Draft EIR, Section 5.2 Air Quality, which addresses all Project and contribution to cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.

- A-SMC-83 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and safety impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

- A-SMC-84 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Please also see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

A-SMC-85 This comment is an opinion in regard to an existing condition, not related to the proposed Project. Further, potential Project effects on quality of life and related conditions, in and of themselves, are not considered environmental impacts under CEQA. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

A-SMC-86 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways, including impacts in local neighborhoods.

Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts.

A-SMC-87 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions; and addresses all Project and contribution to cumulative construction traffic impacts on study area roadways.

A-SMC-88 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

A-SMC-89 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 10: Affordable Housing.

A-SMC-90 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

- A-SMC-91 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative construction traffic impacts on study area roadways.
- A-SMC-92 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments and Master Response 10: Affordable Housing
- A-SMC-93 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and pedestrian safety impacts associated with the construction and operation of the proposed Project, including in local neighborhoods.
- Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts, and Topic 10: Bicycle and Pedestrian Analysis.
- A-SMC-94 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-95 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please see Draft EIR, Section 5.13 Public Services which addresses all Project and contribution to impacts to public schools, police, fire protection and emergency services.
- Please also see Draft EIR, 5.9, Hydrology and Water Quality, and Section 5.16 Utilities and Service Systems which address all Project and contribution to impacts to public water, stormwater collection, and wastewater collection and treatment services.
- A-SMC-96 Please see Draft EIR, Section 5.15 Transportation and Traffic which identifies traffic mitigation measures, including timing for implementation of those measures.

The Stanford Community Plan reflects a policy preference that Stanford remove trips from the roadways to achieve the no net new commute trips standard, rather than increasing vehicle trips and paying for intersection improvements.

The County is not proposing to require Stanford to mitigate an exceedance of the no net new commute trips standard ahead of time, because it is not possible to know today whether the no net new commute standard will be exceeded at any point during implementation of the 2018 General Use Permit, or by how many trips.

Stanford has also agreed to take steps that would mitigate in advance some of the impacts of its future growth before any exceedance of the no net new commute trips standard occurs. Chapter 8 of the Draft EIR describes four sets of off-campus bicycle facility improvements that Stanford has offered to fund if the relevant jurisdictions decide to implement those improvements. Stanford could receive trip reduction credits commensurate with the extent to which each facility improvement removes non-Stanford vehicle trips from the local impact area. These bicycle facility improvements would continue to result in trip reductions after they are constructed, regardless of whether Stanford ever needs to draw on the trip reduction credits.

It should be noted that Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

Please see also Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, and Topic 6: No Net New Commute Trips Standard.

A-SMC-97 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project; and provides a discussion of parking as well.

A-SMC-98 Please see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for detail on the VTA Model's ability to account for the effect of applications such as Waze on driver behavior, and Topic 8: Neighborhood Street Impacts.

- A-SMC-99 Please see Draft EIR, Section 5.11, Noise and Vibration which addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project, including from increases in Project motorcycle traffic.
- A-SMC-100 Please see Draft EIR, Section 5.2, Air Quality and Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative construction air quality and traffic impacts on study area roadways, including construction truck impacts.
- A-SMC-101 Impacts to fire protection services, including from increased traffic congestion, are addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-5, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.
- Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- A-SMC-102 Please see Draft EIR, Section 5.15 Transportation and Traffic for how Project trip generation and distribution was conducted. Please also see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts, and Topic 4: Trip Generation and Distribution.
- A-SMC-103 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- However, please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- A-SMC-104 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals, for a discussion of the Mitigation Monitoring and Reporting Program (MMRP) that is required for the Project.
- A-SMC-105 Please also see Draft EIR, Section 5.15 Transportation and Traffic which describes traffic conditions under existing and 2018 baseline conditions, and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.
- Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, Topic 6: No Net New Commute Trips Standard, Topic 7: Average Daily Traffic and Peak-Hour Spreading.
- A-SMC-106 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax

assessment methods are governed by state law and are not within the scope of environmental review under CEQA.

- A-SMC-107 The California Vehicle Code allows the County of San Mateo to prohibit the use of a street by any commercial vehicle or by any vehicle exceeding a maximum gross weight limit by ordinance.²⁸ Alpine Road is a designated arterial roadway and is designed for heavy vehicles. The County of San Mateo does not currently restrict vehicles on Alpine Road. The County of Santa Clara has no jurisdiction and control over Alpine Road. Further, the Draft EIR does not identify a significant impact that would result from the Project on Alpine Road. For these reasons, restrictions on use of Alpine Road are not identified in the Draft EIR as mitigation measures.
- A-SMC-108 The 2000 General Use Permit and Mitigation Monitoring and Reporting Program adopted for that project establish criteria for monitoring and reporting on that project's compliance with the various required conditions of approval and mitigation measures, including the no net new commute trips standard. The monitoring results are presented in annual reports presented to the County Planning Commission.
- Please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.
- Please also see Master Response 13: Transportation and Traffic, Topic 1, Method for Identifying Study Intersections, Freeway Segments, and Ramps, and Topic 6: No Net New Commute Trips Standard,
- A-SMC-109 Impacts to emergency services, including from increased traffic congestion is addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.
- Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times and Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading.
- A-SMC-110 The conditions at Sand Hill Road and Santa Cruz Avenue are existing conditions. The proposed Project would not modify the design or configuration of intersection; therefore, the Project would not affect vehicle, pedestrian or bicycle safety at this intersection. Please see Response to Comment A-PAUSD1-14 for an explanation of why adding vehicles to an intersection does not result in significant safety impacts for drivers, pedestrians and bicyclists. Please see Draft

²⁸ See http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=VEH§ionNum=35701.

EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative safety impacts associated with the construction and operation of the proposed Project.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, Topic 10: Bicycle and Pedestrian Analysis.

- A-SMC-111 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative pedestrian and bicycle impacts associated with the construction and operation of the proposed Project. The Draft EIR does not identify the need for bike lanes on Alpine Road as mitigation.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, Topic 10: Bicycle and Pedestrian Analysis.

- A-SMC-112 The shuttle services requested by the comment do not relate to impacts of the proposed Project. The commenter is referred to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard regarding Stanford TDM measures, including use of its shuttle.

- A-SMC-113 The Draft EIR does not identify the need for mitigating sound and air quality impacts on Santa Cruz Avenue. Please also see Draft EIR, Section 5.2 Air Quality and 5.11, Noise and Vibration, which addresses all Project and contribution to cumulative air quality and noise impacts associated with the construction and operation of the proposed Project.

- A-SMC-114 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics

Please see also Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution.

- A-SMC-115 With respect to the treatment of emergency services and public schools, see Draft EIR Section 5.13, Public Services, which addresses the project's physical effects with respect to the need for construction of schools or fire or emergency medical response facilities. CEQA does not generally require analysis of effects on hospitals or health care, as this is not a publicly managed service.

- A-SMC-116 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

- A-SMC-117 Impacts to emergency responders and emergency vehicles are addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

- A-SMC-118 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

Please also see Draft EIR, Section 5.9 Hydrology and Water Quality, which addresses all Project and contribution to cumulative groundwater impacts, including groundwater recharge.

- A-SMC-119 This comment does address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

- A-SMC-120 This comment does address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

- A-SMC-121 Impacts to emergency response are addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7. Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

It is unclear what enforcement the comment is referring to. However, with respect to enforcement of EIR mitigation measures, please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals, for a discussion of the Mitigation Monitoring and Reporting Program (MMRP) that is required for the Project.

- A-SMC-122 This comment does not address the proposed Project or the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Please also see Master Response 6: Approach to 2018 Baseline Environmental Setting, and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting, Topic 2: Approach for Cumulative Scenario, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary; and Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts.

- A-SMC-123 This comment does not address the proposed Project or the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

- A-SMC-124 As illustrated in Figure 5.15-1 and presented in Table 5.15-1 of the Draft EIR, the analysis of Sand Hill Road, Alpine Road, Santa Cruz Avenue, and Alameda de las Pulgas is represented by 15 intersections. The project impacts at these intersections are presented in discussions of Impacts 5.15-2, Baseline plus Project

and 5.15-9, Cumulative plus Project, respectively. A significant impact is identified at only one intersection between I-280 and the Stanford campus on Sand Hill Road, Alpine Road or Santa Cruz Avenue: Intersection #2 (I-280 NB Off-Ramp/ Sand Hill Road). On page 5.15-123, the Draft EIR determines that if the no net new commute trips standard is not achieved, the impact at this intersection can be reduced to a less-than-significant level by widening the off-ramp from two to three lanes to accommodate the construction of a second right-turn lane. The same improvement was identified by the City of Menlo Park in the ConnectMenlo Final EIR.²⁹

A-SMC-125 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to safety impacts associated with the construction and operation of the proposed Project, including to pedestrians.

Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

A-SMC-126 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However please also see Draft EIR, Section 5.2, Air Quality, Section 5.11, Noise and Vibration and Section 5.15 Transportation and Traffic which address air quality, noise and traffic conditions under existing and 2018 baseline conditions, and address all Project and contribution to cumulative air quality, noise and traffic impacts associated with the construction and operation of the proposed Project on study area roadways. Please also see Draft EIR, Section 5.2 Air Quality, which addresses all direct and cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.

A-SMC-127 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

However please also see Draft EIR Section 5.11, Noise and Vibration which addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project on study area roadways.

A-SMC-128 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and safety impacts associated with the construction and operation of the proposed Project.

²⁹ <https://www.menlopark.org/1013/Environmental-Impact-Report>.

Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

As outlined in Chapter 3, *Project Description*, under the 2018 General Use Permit, Stanford plans to construct several bicycle and pedestrian supportive projects on the Project site that are designed to serve local area student trips to the Nixon and Escondido Elementary Schools. Stanford proposes to construct the improvements on the Project site that have been identified by the PAUSD and the City of Palo Alto as Suggested Routes to Schools. Circulation improvements on Stanford lands in and around Nixon and Escondido Elementary Schools could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, and wayfinding signs and additional traffic control.

A-SMC-129 Please see Draft EIR, Section 5.2 Air Quality, which addresses all Project and contribution to cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.

A-SMC-130 Please see Chapter 2, Introduction in the Draft EIR, and Chapter 1, Introduction in this Response to Comments Document which provide detail on the environmental review process for this Project, and the numerous opportunities for public review and input in the process.

A-SMC-131 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Nevertheless, the Draft EIR discloses all on- and off-campus Project and contribution to cumulative impacts.

A-SMC-132 Please see Response to Comment A-SMC-65, above.

Please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic, Topic 1, Method for Identifying Study Intersections, Freeway Segments, and Ramps, Topic 6: No Net New Commute Trips Standard, and Topic 7: Average Daily Traffic and Peak-Hour Spreading.

A-SMC-133 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

A-SMC-134 The Project site is located within the Palo Alto Unified School District boundary. Therefore, as analyzed under the Draft EIR, potential student population growth

generated by the Project would be served, not by the La Entrada School, but by schools under the Palo Alto Unified School District.

A-SMC-135 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax assessment issues are governed by state law and are not within the scope of environmental review under CEQA.

A-SMC-136 Please see Master Response 13: Transportation and Traffic: Topic 6: No Net New Commute Trips Standard.

A-SMC-137 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

A-SMC-138 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics. Please also see Master Response 13: Transportation and Traffic.

A-SMC-139 Impacts to emergency vehicles are addressed in Draft EIR Section 5.13 Public Services, Impact 5.13-1, Impact 5.13-2, Impact 5.13-3, Impact 5.13-5 and Impact 5.13-6, and Draft EIR Section 5.15 Transportation and Traffic, Impact 5.15-1, and Impact 5.15-7.

Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

A-SMC-140 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

A-SMC-141 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and safety impacts associated with the construction and operation of the proposed Project.

A-SMC-142 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

A-SMC-143 This comment is in regard to an existing condition, not related to the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However please also see Draft EIR, Section 5.15 Transportation and Traffic which discusses traffic conditions under existing and 2018 baseline conditions,

and addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project on study area roadways.

Please also see Master Response 13: Transportation and Traffic.

- A-SMC-144 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-145 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-146 Please see the Draft EIR Chapter 1, Introduction which provides an overview of the environmental review and approval process for the Project; see also Master Response 4: Environmental Review Process. Topic 1: Use of Program EIR and Subsequent Approvals. The County of Santa Clara’s environmental review and project approval processes for the Project comply with all applicable CEQA and California land use law requirements.
- A-SMC-147 The comment does not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-148 Please see the Draft EIR Chapter 1, Introduction which provides an overview of the environmental review and approval process for the Project; see also Master Response 4: Environmental Review Process. Topic 1: Use of Program EIR and Subsequent Approvals.
- A-SMC-149 Please see the Draft EIR Chapter 1, Introduction which provides an overview of the environmental review and approval process for the Project; see also Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals, for a discussion of the Mitigation Monitoring and Reporting Program (MMRP) that is required for the Project.
- A-SMC-150 Please see the Draft EIR Chapter 1, Introduction which provides an overview of the environmental review and approval process for the Project; see also Master Response 4: Environmental Review Process. Topic 1: Use of Program EIR and Subsequent Approvals.
- A-SMC-151 Please see the Draft EIR Chapter 1, Introduction which provides an overview of the environmental review and approval process for the Project; see also Master Response 4: Environmental Review Process. Topic 1: Use of Program EIR and Subsequent Approvals. The County of Santa Clara’s environmental review and project approval processes for the Project comply with all applicable CEQA and California land use law requirements.

- A-SMC-152 Please see the Draft EIR Chapter 1, Introduction which provides an overview of the environmental review and approval process for the Project; see also Master Response 4: Environmental Review Process. Topic 1: Use of Program EIR and Subsequent Approvals.
- A-SMC-153 The Draft EIR Section 5.11, Noise and Vibration addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project. Where the Draft EIR finds significant noise impacts, mitigation measures are identified that would avoid or reduce the magnitude of those impacts to the extent feasible. The Draft EIR does not identify any significant transportation noise impacts, and consequently, no mitigation is required for that effect.
- A-SMC-154 The Draft EIR Section 5.15, Transportation and Traffic addresses all Project and contribution to cumulative transportation impacts associated with the construction and operation of the proposed Project. Where the Draft EIR finds significant transportation impacts, mitigation measures are identified that would avoid or reduce the magnitude of those impacts to the extent feasible.
- The Draft EIR Impact 5.15-5 found that the proposed Project would not substantially increase intrusion by traffic in nearby neighborhoods, and consequently, no mitigation is required for that effect.
- A-SMC-155 The Draft EIR Section 5.15, Transportation and Traffic addresses all Project and contribution to cumulative transportation impacts associated with the construction and operation of the proposed Project. Where the Draft EIR finds significant transportation impacts at local study intersections (Impacts 5.15-2 and 5.15-9), mitigation measures are identified that would avoid or reduce the magnitude of those impacts to the extent feasible.
- As discussed in Response to Comment A-SMC-154, above, the Draft EIR Impact 5.15-5 found that the proposed Project would not substantially increase intrusion by traffic in nearby neighborhoods, and Impact 5.15-6 found that the proposed Project would not substantially increase hazards due to a design feature or incompatible use. Consequently, no mitigation is required for these effects.
- A-SMC-156 The Draft EIR Section 5.15 provided information regarding Stanford’s on-campus parking supplies and the surrounding communities’ off-campus parking restrictions. The analysis demonstrated that substantial off-campus parking is not anticipated to occur.
- Please also see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for additional detail related to Stanford affiliates parking off-campus.

- A-SMC-157 The comment does not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-158 As discussed in Response to Comment A-SMC-154, above, the Draft EIR Impact 5.15-5 found that the proposed Project would not substantially increase intrusion by traffic in nearby neighborhoods. Consequently, no mitigation is required for this effect.
- A-SMC-159 Please see Response to Comment A-SMC-155, above.
- A-SMC-160 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and pedestrian safety impacts associated with the construction and operation of the proposed Project.
- Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts, and Topic 10: Bicycle and Pedestrian Analysis.
- A-SMC-161 Please see Response to Comment A-SMC-160, above.
- A-SMC-162 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project.
- A-SMC-163A The comment does not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-163B The commenter is referred to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on the effectiveness of Stanford's TDM program.
- A-SMC-164 Please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic and safety impacts associated with the construction and operation of the proposed Project. With respect to parking, please see Response to Comment A-SMC-156, above.
- Please also see Draft EIR, Section 5.11 Noise and Vibration which addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project.
- Please also see Draft EIR, Section 5.13 Public Services which addresses all Project and contribution to cumulative impacts to public services, including police protection, associated with the construction and operation of the proposed Project.

- A-SMC-165 With respect to off-campus parking, please see Response to Comment A-SMC-156, above.
- A-SMC-166 Please see Draft EIR, Section 5.11 Noise and Vibration which addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project.
- Please see Draft EIR, Section 5.13 Public Services which addresses all Project and contribution to cumulative impacts to public services, including police protection, associated with the construction and operation of the proposed Project.
- With respect to parking, please see Response to Comment A-SMC-156, above.
- A-SMC-167 Please see Draft EIR, Section 5.11 Noise and Vibration which addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project.
- Please see Draft EIR, Section 5.13 Public Services which addresses all Project and contribution to cumulative impacts to public services, including police protection, associated with the construction and operation of the proposed Project.
- A-SMC-168 Please see Master Response 10: Affordable Housing, Topic 2: Historic Use of Stanford Affordable Housing Fund, and Topic 3: Future Contribution to Affordable Housing Fund, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.
- A-SMC-169 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- A-SMC-170 Please see Response to Comment A-SMC-153, above.
- A-SMC-171 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- A-SMC-172 Please see Response to Comment A-SMC-166, above.
- A-SMC-173 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics. With respect to parking impacts, please also see Response to Comment A-SMC-156, above.
- A-SMC-174 Please see Response to Comment A-SMC-155, above.
- A-SMC-175 Please see Response to Comment A-SMC-155, above.
- A-SMC-176 Please see Response to Comment A-SMC-160, above.

- A-SMC-177 Please see Response to Comment A-SMC-160, above.
- A-SMC-178 Please see Response to Comments A-SMC-129 and A-SMC-153, above.
- A-SMC-179 Please see Response to Comment A-SMC-160, above.
- A-SMC-180 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-181 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- A-SMC-182 As illustrated in Figure 5.15-1 of the Draft EIR, 13 intersections were evaluated on Sand Hill Road and in West Menlo Park to assess the impacts of the proposed Project. See Impacts 5.15-2 and 5.15-9 for the results of the intersection analysis.
- Please also see Master Response 13: Transportation and Traffic, Topic 1, Method for Identifying Study Intersections, Freeway Segments, and Ramps, Topic 6: No Net New Commute Trips Standard, and Topic 7: Average Daily Traffic and Peak-Hour Spreading.
- A-SMC-183 The commenter is referred to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on the effectiveness of Stanford TDM program.
- A-SMC-184 Please see Response to Comment A-SMC-156, above.
- A-SMC-185 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- A-SMC-186 The comment does not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- A-SMC-187 With respect to sound wall and plant sound barriers, please see Response to Comment A-SMC-153, above. With respect to stacked thoroughfare roads to divert car commuters out of residential neighborhoods, please see Response to Comment A-SMC-154, above. With respect to stop lights, please see Response to Comment A-SMC-155, above.
- A-SMC-188 Please see Response to Comment A-SMC-152, above.
- A-SMC-190 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR, Sections 5.2 Air Quality and 5.15 Transportation and Traffic, which address all Project and contribution to cumulative air quality and related health risk impacts, and traffic and safety impacts associated with the construction and operation of the proposed Project.

Please also see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts, and Topic 10: Bicycle and Pedestrian Analysis.

- A-SMC-191 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.2 Air Quality, which addresses all Project and contribution to cumulative air quality and related health risk impacts associated with the construction and operation of the proposed Project.

- A-SMC-192 Impacts of the Project on property values is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

- A-SMC-193 The EIR was prepared by the County in accordance with current State, County and other applicable agency CEQA Guidelines and professional standards.

- A-SMC-194 The comment does not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative safety impacts associated with the construction and operation of the proposed Project.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, Topic 10: Bicycle and Pedestrian Analysis.

- A-SMC-195 Please see response to A-SMC-195, above.

- A-SMC-196 to A-SMC-203

The comments are in reference to the Alpine Road Traffic Corridor Study prepared by the County of San Mateo.³⁰ These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments. With respect to the analysis of impacts on Alpine Road, please see Response to Comment A-SMC-2, above.

Please also see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative safety impacts associated with the construction and operation of the proposed Project.

³⁰ See <https://publicworks.smcgov.org/alpine-road-traffic-corridor-study>.

Please also see Master Response 13: Transportation and Traffic, Topic 9: Design Hazards and Safety Impacts, Topic 10: Bicycle and Pedestrian Analysis.

A-SMC-204 These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

With respect to the requested shuttle services, please see Response to Comment A-SMC-112. Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

A-SMC-205 These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts on study area roadways associated with the construction and operation of the proposed Project. Please also see Responses to Comments A-EPA-7 through A-EPA-11, above.

A-SMC-206 These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts on study area roadways associated with the construction and operation of the proposed Project.

A-SMC-207 These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR, Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts on study area roadways associated with the construction and operation of the proposed Project.

A-SMC-208 and A-SMC-209

These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

A-SMC-210 These comments are noted, but do not comment on the proposed Project or address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

SAN MATEO



LOCAL AGENCY FORMATION COMMISSION

455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849

January 29, 2018

Mr. David Rader
County of Santa Clara
Department of Planning and Development
County Government Center
70 West Hedding Street
San Jose, CA 95110

Subject: Draft Environmental Impact Report for Stanford University's 2018 General Use Permit Application

Dear Mr. Rader,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Stanford University's 2018 General Use Permit Application. Local Agency Formation Commissions (LAFCos) exist in each county of the state and were created to regulate the boundaries of cities and special districts, discourage urban sprawl, encourage the orderly growth and development of local government agencies, and prevent premature conversion of agricultural and open space lands. A primary purpose of LAFCo is to promote annexation of territory within city spheres of influence to cities, in particular when changes in land use create demand for a broad range of municipal services.

1

The DEIR lacks discussion of potential annexation of Stanford lands in San Mateo County located in a city sphere of influence in cases where existing development would benefit from city service delivery, or new development would result in an increased demand for municipal service. Additionally, Section 3.3 of the DEIR cites an existing land use agreement between Santa Clara County, Stanford, and the City of Palo Alto that includes policies regarding land use, annexation, planning, and development of Stanford lands in unincorporated Santa Clara County. The DEIR lacks discussion of a similar agreement between Stanford, the County of San Mateo, and cities that include Stanford lands.

2

Thank you for the opportunity to comment.

Sincerely yours,

Martha M. Poyatos
Executive Officer

cc: LAFCo Commissioners
Michael Callagy, Assistant County Manager, County of San Mateo
Steve Monowitz, Director of Community Development, County of San Mateo
Alex McIntyre, City Manager, City of Menlo Park
Melissa Stevenson Diaz, City Manager, City of Redwood City
John D. Donahoe, Director, Planning and Entitlement, Stanford University

COMMISSIONERS: MIKE O'NEILL, CHAIR, City ▪ ANN DRAPER, VICE CHAIR, Public ▪ JOSHUA COSGROVE, Special District ▪ RICH GARBARINO, City
DON HORSLEY, County ▪ JOE SHERIDAN, Special District ▪ WARREN SLOCUM, County

ALTERNATES: KATI MARTIN, Special District ▪ HARVEY RARBACK, City ▪ SEPI RICHARDSON, Public ▪ DAVE PINE, County

STAFF: MARTHA POYATOS, EXECUTIVE OFFICER ▪ REBECCA ARCHER, LEGAL COUNSEL ▪ JEAN BROOK, COMMISSION CLERK
5.2.1-300

5.2.1.18 Responses to Comments from San Mateo Local Agency Formation Commission

- A-SMLAF-1 The comment summarizes the purpose of Local Agency Formation Commissions. No response is required.
- A-SMLAF-2 The proposed 2018 General Use Permit would govern Stanford lands in unincorporated Santa Clara County, and would not extend to any Stanford lands in San Mateo County. Any requests to annex land in San Mateo County, and any development of land in San Mateo County, would be the subject of separate, independent applications to the relevant San Mateo County jurisdictions. The Draft EIR for the proposed 2018 General Use Permit does not assess such requests because they are not part of the proposed Project, nor are they reasonably foreseeable consequences of approval of the proposed Project.³¹ Development of a Land Use Policy Agreement involving Stanford lands in San Mateo County would be a separate process from the County of Santa Clara's consideration of the 2018 General Use Permit.

³¹ It should be noted that during environmental review of the proposed 2018 General Use Permit, Stanford applied to the San Mateo County Local Agency Formation Commission to change jurisdictional boundaries on a property at 2131 Sand Hill Road. The property is located in unincorporated San Mateo County, and Stanford sought annexation to the City of Menlo Park. The County and Menlo Park had reached agreement on tax sharing, and Menlo Park initially had approved an ordinance to pre-zone the site to enable its development as an approximately 39,800-square foot office building. The City of Menlo Park adopted a Mitigated Negative Declaration (MND) for the project finding that development of the site would not result in any significant adverse impacts on the environment after implementation of the mitigation measures identified in the MND. However, Menlo Park subsequently rescinded its pre-zoning approval and Stanford has taken no further action on the application.



The Town of
Woodside

January 31, 2017

Mr. David Rader
County of Santa Clara
Department of Planning and Development
david.rader@pln.sccgov.org

VIA EMAIL

RE: Stanford University 2018 General Use Permit Draft EIR (State Clearinghouse No. 2017012022; File #7165-16P-16GP-16Z-16)

Dear Mr. Rader:

The Town of Woodside (Town) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for Stanford University's proposed "2018 General Use Permit" (GUP) (State Clearinghouse No. 2017012022; File #7165-16P-16GP-16Z-16).

P.O. Box 620005
2955 Woodside Road
Woodside CA 94062

We understand that the 2018 GUP sets forth a conceptual development plan through a 2035 planning horizon that would allow 2,275,000 sf of net new academic and academic support development and 3,150 net new housing units/beds within the Academic Growth Boundary located within the County of Santa Clara's jurisdiction over and above the remaining development still allowed under the current 2000 GUP. To put this in perspective, when this remaining allotment is combined with the additional housing Stanford is now requesting, this would allow for a population increase that well exceeds the entire population of the Town of Woodside.

While the magnitude of the project creates a number of concerns, the Town's comments on the Draft EIR set forth below focus solely on the adequacy of the project description and the Transportation and Traffic impact analysis under the California Environmental Quality Act (CEQA).

Project Description

650-851-6790

Fax: 650-851-2195

townhall@woodsidetown.org

- We understand that the 2000 GUP required Stanford to identify and

↓ 1

study the maximum build-out potential for its campus, but this requirement was never satisfied. The EIR project description should include at least a discussion on this matter explaining why this 2000 GUP requirement has not yet been met and either identifying and studying the potential maximum build out of the campus or estimating when it is expected to be identified and studied. The Town respectfully requests that the County delay any certification of the EIR and/or approval of the 2018 GUP until Stanford identifies and consents to a maximum build out potential of its campus.

1
cont.

Transportation and Traffic Impact Analysis

- The EIR's Transportation and Traffic section fails to study the following intersections and freeway ramps and segments:
 - I-280 Westbound On-Ramp/ Woodside Road
 - I-280 Westbound Off-Ramp/ Woodside Road
 - I-280 from Woodside Road south to Sandhill Road
 - I-280 from Sandhill Road north to Woodside Road
 - I-280 from Farm Hill Road south to Woodside Road
 - I-280 from Woodside Road north to Farm Hill Road
 - Sand Hill Road/Portola Road
 - Woodside Road/ Whiskey Hill Road
 - Woodside Road/ Canada Road/ Mountain Home Road

The EIR should include and analyze the impact of the project on the above listed intersections, freeway ramps and segments because they are in the immediate vicinity of the project area and therefore it is reasonably foreseeable that they fall within the 10-trips-per-hour-per-lane rule set by the Santa Clara Valley Transportation Authority which requires that an intersection be included for analysis if 10 or more project-generated trips will use a lane traveling through that intersection during one or more peak hours. Accordingly, the Town's General Plan transportation goals and policies and thresholds of significance should also be included in the EIR's Transportation and Traffic section and used to identify whether any significant impacts to these intersections and freeway ramps and segments would result from the project and require mitigation.

2

- The EIR has failed to adequately justify why the transportation impacts of the project are evaluated solely against a future 2018 baseline and further has failed to adequately justify the assumptions

3

used to calculate this future baseline. The general rule under CEQA is that the existing physical “on the ground” conditions at the time the notice of preparation for an EIR is published is used as the baseline for determining whether the impacts resulting from a project are significant. 14 Cal. Regs 15125(a). Use of a proper baseline is critical to a meaningful assessment of a project’s environmental impacts. An EIR that limits its analysis to a comparison with future development allowed by existing zoning and other land use plans is legally inadequate. *Woodward Park Homeowner’s Ass’n v City of Fresno* (2007) 150 Cal.App.4th 683, 707. An impact analysis that compares impacts with conditions that may be allowed under a permit rather than with environmental conditions as they actually exist results in misleading comparisons rather than an analysis that informs decision-makers and the public. *Communities for a Better Environment v South Coast Air Quality Mgt Dist.* (2010) 48 Cal. 4th 310, 322. While we understand that the County has discretion in how best to define a baseline under “the circumstance of rapidly changing conditions” an agency may only substitute a baseline consisting solely of future conditions when the agency has justified that decision by showing that an existing conditions baseline would be “misleading or without informational value.” *Neighbors for Smart Rail v Exposition Metro Line Constr. Auth* (2013) 57 Cal.4th 439, 447, 453, 457.

3
cont.

- We echo the City of Menlo Park’s and City of Palo Alto’s general concerns with the “no new net trips” policy and its ability to mitigate the transportation impacts of the project given the experienced increase in levels of congestion due to Stanford related trips since the 2000 GUP was approved. As stated in the Hexagon Transportation Consultants, Inc. report dated November 13, 2017 “it is an exceedingly ambitious goal to construct 2.275 million square feet of academic and academic support space and 3,150 new units/beds and to not increase peak hour vehicle volumes at all.”

4

- The EIR fails to and should explain exactly how it generated the “campus vehicle trip generation rates” set forth in Tables 5.15-11, 5.15-12, 5.15-14, 5.15-15. Since these unusually low rates are relied upon to estimate the total net new trips set forth in Table 5.15-17, without some explanation of how these rates are calculated it is impossible to ascertain whether the total estimated net new trips is adequately represented.

5

- Mitigation Measure 5.15-2(3) sets the baseline for measuring the no net new commute trips standard to the count that was established in 2001 but allows Stanford to propose a different “monitoring methodology” with adjustment of the 2001 baseline “as needed” during implementation of the 2018 GUP. This is impermissible under CEQA because there is no established standard identified for the County’s acceptance of such new monitoring methodology. Future adjustment of the 2001 baseline is even more troubling as it appears to allow a “moving target” for determining whether or not Stanford is complying with the no new commute trips standard. The EIR should be revised to delete the ability to adjust the 2001 baseline, and/or to explain how such adjustment is not a violation of CEQA, allowing Stanford to get out of implementing mitigation that would otherwise be required under the 2001 baseline.

6
- We echo the City of Menlo Park’s comments that the EIR should be revised to expand the mitigation monitoring program in order to capture the hours of congestion across the peak periods of 7:00-9:00am and 4:00-7:00pm because congested conditions in the region are no longer limited to a single morning and evening peak hour. Likewise, the impact analysis itself should be expanded to reflect these additional hours.

7
- We echo the City of Menlo Park’s comments that the EIR should include an analysis of the project’s generation of reverse direction trips and identify mitigation measures to reduce any identified impacts associated with these trips.

8
- We echo the City of Menlo Park’s comments that if Stanford fails to comply with the no net commute trips standard, it should be required to assume responsibility in collaboration with the governing jurisdiction to design, fund and construct physical infrastructure improvements so that the burden of mitigation is not shifted to neighboring cities.

9
- We echo the City of Menlo Park’s comments that Stanford should be required to construct all project-level mitigation measures consisting of physical improvements rather than simply make a fair-share payment towards these improvements.

10
- The EIR’s analysis of the project’s impact on transit facilities, including bicycle facilities, fails to address whether the project would conflict

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with an adopted policy regarding public transit, decrease the performance or safety of transit facilities, or exceed adopted load factors of such transit facilities thereby impacting transportation mode choice both within the campus and surrounding the campus. These impacts should be thoroughly analyzed, and if any are determined to be significant, the EIR should identify appropriate mitigation measures that expand and improve these facilities so that their use is encouraged.

11
cont.

- The EIR fails to examine how permitting the requested 2000 additional parking spaces would impact Stanford's ability to meet the no net new commute trips standard, the assumption relied upon in the EIR. If 2,000 more parking spaces are available, it would seem this would encourage 2,000 net new trips thereby bringing Stanford out of compliance with the no net new commute standard.
- We echo the City of Palo Alto's comment that revisions to the EIR's Air Quality, Greenhouse Gas Emissions and Noise analyses should be revised to reflect changes made to the Transportation and Traffic section in response to these and other public comments.

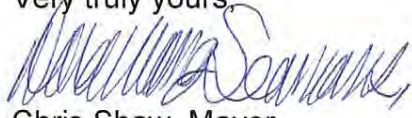
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We respectfully request that the above listed concerns be addressed in the final EIR in compliance with CEQA and that the County delay any certification of the EIR and/or approval of the 2018 GUP until Stanford identifies and consents to a maximum build out potential of its campus. If you have any questions regarding these comments, please contact our deputy Town Attorney Camas Steinmetz at csteinmetz@adcl.com or 650-453-3905. If helpful, we would be happy to meet with you, Supervisor Simitian, and representatives of the University to help resolve any of these issues and concerns.

14

Very truly yours,

for  Town Clerk
Chris Shaw, Mayor

Cc: James Keene, City Manager of the City of Palo Alto
Alex McIntyre, City Manager of the City of Menlo Park
Jeremey Dennis, Town Manager of the Town of Portola Valley
Renee Batti, Editor of The Almanac Editor
Dave Price, Editor and Co-Publisher of the Daily Post

5.2.1.19 Responses to Comments from Town of Woodside

A-WOOD-1 Please also see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study; and Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

A-WOOD-2 With regard to the intersections and freeway segments within the Town of Woodside, no intersections were identified as having met the 10 trips per lane guideline for evaluation that is established by the VTA, and therefore no intersections in the Town of Woodside were evaluated in the Draft EIR. Had any intersections met the 10 trips per lane guideline, the Draft EIR would have applied significance standards based on the Town's General Plan transportation goals and policies. The freeway segments requested for analysis were evaluated in the Draft EIR and TIA.

Regarding the request to include the Town of Woodside's General Plan transportation goals and policies and thresholds of significance in the EIR's Transportation and Traffic Section, the *Town of Woodside General Plan 2012* does not contain policies regarding thresholds for when to assess traffic impacts of land use developments, nor does it contain traffic operational standards. The General Plan does contain several policies related to traffic safety, minimization of through traffic, improvement of commercial district traffic, and management of recreational vehicle and bicycle traffic. As presented in Figure 6 of Draft EIR Appendix TIA (Part 1), the analysis of Stanford commuter residences that was conducted to inform the project trip distribution indicated less than one percent of faculty/staff commuters reside in Woodside. This corresponds to approximately 8 Project peak hour trips in both the AM and PM peak hours. Therefore, the Project's traffic would not be expected to substantially affect these policy concerns in the Town General Plan.

Please see Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps for additional detail on the methodology used to select study area intersections, freeway segments, and freeway ramps.

A-WOOD-3 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting; and Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for a discussion of the development of the 2018 environmental baseline, and the 2018 Baseline Model selection and development, respectively. Under CEQA, a lead agency may appropriately define an "existing conditions" baseline as conditions expected when the project becomes operational, i.e., an "opening day" baseline. See *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal. 4th 439,453. The

2018 baseline employed by the Draft EIR is considered an “existing conditions” baseline and not a “future conditions” baseline.

- A-WOOD-4 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for evidence of the effectiveness of the no net new commute trips program, including the ability to expand the program to reduce more vehicle trips.
- A-WOOD-5 Please see Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution for a discussion of vehicle trip generation.
- A-WOOD-6 Draft EIR Mitigation Measure 5.15-2(3), on page 5.15-83 states that the baseline for measurement of the no net new commute trips standard will be the count that was established in 2001.³² However, the mitigation measure recognizes that if the monitoring methodology is updated, testing and calibration of the new methodology or equipment will require coordination with the County of Santa Clara, and the 2001 baseline data will be adjusted as needed to reflect any such calibration. The adjustment is intended to be a calibration and not a reset of the 2001 baseline. Any adjustment would be performed to calibrate the new data collection method with the old data collection method to ensure that the baseline is held constant. The adjustment would not allow Stanford to escape the 2001 baseline requirement.

Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

The commenter recommends continued use of the 2001 baseline during implementation of the 2018 General Use Permit. Please note that the 2001 baseline is not the same as the CEQA existing conditions baseline used throughout the EIR to measure the Project’s traffic impacts. Rather, the 2001 baseline is applicable only to implementation of the no net commute trips standard.

Continued use of the 2001 baseline in Mitigation Measure 5.15-2(3) is appropriate and consistent with CEQA for this limited use for several reasons. First, the 2001 baseline reasonably reflects the conditions that are expected at completion of the academic facilities and housing authorized by the 2000 General Use Permit. Second, the 2000 General Use Permit allows campus development constructed under that permit to fill the difference between the current cordon counts (which are lower than the 2001 baseline counts) and the 2001 baseline counts. Because Stanford has reduced trips below the baseline

³² Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

level, it is allowed some growth in vehicle trips back up to the baseline. Projects constructed under the 2000 General Use Permit, such as the Escondido Village Graduate Residences project, may fill all or part of that gap.

- A-WOOD-7 Please see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.
- A-WOOD-8 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis to address the impact of reverse-commute trips, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy.
- A-WOOD-9 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on the penalty for non-compliance with the no net new commute trips standard.
- A-WOOD-10 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion mitigation measure funding/implementation.
- A-WOOD-11 The Draft EIR identifies the significance criteria selected for evaluating impacts to transit service on pages 5.15-59 and 5.15-60. The EIR recognizes that increased *demand* for transit services is not considered to be a significant adverse effect on the physical environment; to the contrary, increased demand for transit service is considered to be beneficial because moving drivers to transit reduces roadway congestion, vehicle miles traveled, air pollutant emissions, and greenhouse gas emissions. The Draft EIR therefore focuses on transit *delay* in assessing the potential for a significant adverse change to the physical environment. The impact is considered to be significant if the project would result in substantial delay to transit services. Whether delay is substantial depends upon the context in which the delay occurs, including the overall duration of a commute trip on a given transit service.

On page 5.15-142, the Draft EIR explains that the proposed Project would not conflict with adopted policies, plans or programs regarding public transit because the proposed Project would not interfere with or block access to transit. The Draft EIR addresses the performance of transit facilities by evaluating the potential for the project to result in transit delay. The VTA TIA Guidelines recommend using added delay at individual intersections as a surrogate for added bus delay. Table 5.15-36 on pages 5.15-142 and 5.15-143 of the Draft EIR presents the increased intersection delays resulting from the proposed Project, conservatively assuming Stanford does not expand its transportation demand management programs to achieve the no net new commute trips standard. No feature of the proposed Project would affect the safety of transit facilities

because, as stated in the Draft EIR, the proposed Project would not interfere with or block access to transit. A change in the load factors of transit service facilities is not considered to be a significant adverse change to the physical environment as described above. However, the Draft EIR does provide a transit capacity analysis at pages 5.15-157 to 5.15-167.

Lastly, please note that under CEQA an EIR may use significance criteria developed by experts preparing the EIR. *Napa Citizens for Honest Government v. Napa County Board of Supervisors* (2001) 91 Cal.App. 4th 342. An EIR may use significance criteria tailored to a specific project, and these not be based on the significance questions in CEQA Guidelines Appendix G. *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App. 4th 1059.

- A-WOOD-12 Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of the on-campus parking supply and its evaluation in the Draft EIR.
- A-WOOD-13 Please see the responses to transportation, air quality, greenhouse gases and noise comments in this letter and in the City of Palo Alto's comment letter.
- A-WOOD-14 As discussed in the above responses, none of the concerns raised in Woodside's comment letter suggest that the EIR does not comply with CEQA. Regarding buildout analysis, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study; and Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.