

5.2.3 Draft EIR Comment Letters – Individuals

From: [REDACTED]
To: supervisor.smitian@bos.sccgov.org
Cc: [Rader, David](#); [Prior, Christine](#); [Hellman-Tincher, Micaela](#); greg.scharff@cityofpaloalto.org; [REDACTED]; tomforcouncil@gmail.com; tom.dubois@cityofpaloalto.org; eric.filseth@cityofpaloalto.org; Adrian.Fine@cityofpaloalto.org; cory.wolbach@cityofpaloalto.org; karen.holman@cityofpaloalto.org; liz.kniss@cityofpaloalto.org; greg.tanaka@cityofpaloalto.org; greg@gregtanaka.org; Lydia.Kou@cityofpaloalto.org
Subject: Stanford Proposed 2018 Expansion (2.3 million sqft) versus Bay-Area Monstrous-Dangerous Traffic Pollution
Date: Monday, October 30, 2017 4:13:51 PM

30 October 2017

Stanford Proposed 2018 Expansion (2.3 million sqft)

versus

Bay-Area Monstrous-Dangerous Traffic Pollution

Stanford proposed 2018 expansion plan os 2.3 million sqft
should not be approved before the huge and harmful traffic
and its air pollution problems in the Bay Area -
are being solved !!!

Solutions include establishment of public transportation (BART ,
High Speed Trains , Buses and Taxis) that will reduce
significantly the millions of cars that congest and clog and choke
the roads , and pollute and sicken the population of Palo Alto and
the Bay Area and Planet Earth !!!

Check Google expansion plan in San Jose that is to start only
after the year 2025 , when BART and High Speed Trains are

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scheduled to be completed !!!

In the meantime , why not enforce Stanford to plant trees and build recreation park in the 2.3 million square foot area - instead of "develop" (i.e. destroy) it with houses and roads and 10,000 more residents (who account for 20% of Palo Alto population) , and add at least 20,000 more cars !!!

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5.2.3.1 Responses to Comments from Isaac Achler

I-Achler1-1 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

However, please see Draft EIR Section 5.2, Air Quality, 5.3 Biological Resources, 5.14 Recreation, and Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative air quality, biological resources, recreation and traffic impacts associated with the construction and operation of the proposed Project, and mitigation that reduces significant impacts to the extent feasible. Please also see Master Response 13: Transportation and Traffic.

From: [REDACTED]
To: [Rader, David](#)
Subject: Fwd: Stanford Proposed 2018 Expansion (2.3 million sqft) versus Bay-Area Monstrous-Dangerous Traffic Pollution
Date: Tuesday, November 7, 2017 1:19:10 PM

----- Forwarded message -----

From: [REDACTED]
Date: Mon, Nov 6, 2017 at 4:30 PM
Subject: Stanford Proposed 2018 Expansion (2.3 million sqft) versus Bay-Area Monstrous-Dangerous Traffic Pollution
To: cindy.chavez@bos.sccgov.org, mike.wasserman@bos.sccgov.org,
dave.cortese@bos.sccgov.org, ken.yeager@bos.sccgov.org,
supervisor.yeager@bos.sccgov.org, supervisor.simitian@bos.sccgov.org

06 November 2017

Stanford Proposed 2018 Expansion (2.3 million sqft)

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cont.

5.2.3.2 Responses to Comments from Isaac Achler

I-Achler2-1 Please see Response to Comment I-Achler1-1.

Comment Letter I-Adornato

From: [Bruce Adornato](#)
To: [Rader, David](#)
Subject: Stanford Plan
Date: Thursday, December 21, 2017 9:04:47 AM

Maximum buildout at Stanford?.

We would like to know if there will ever be any limit on the build out. The traffic on Sandhill and Page Mill is already very bad.

Traffic estimates need to look at 24 hour periods not just peak rush hour since we see that Stanford employees are simply working later and coming earlier.

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I 3

bruce adornato

palo alto

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bta

5.2.3.3 Responses to Comments from Bruce Adornato

- I-Adornato-1 Please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study.
- I-Adornato-2 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.
- I-Adornato-3 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).
- Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

Comment Letter I-Almond

From: [Richard Almond](#)
To: [Rader, David](#)
Subject: traffic on routes to Dunbarton Bridge
Date: Sunday, November 5, 2017 9:43:36 PM

The increases in housing, jobs and commercial activity under the GUP proposal will add to the already parking-lot situation on University Avenue between 3-7 weekdays. Several times in recent weeks slow-downs upstream on the Dumbarton Bridge have led to greater traffic tie-ups backing onto feeder streets in Crescent Park. Even a small addition to traffic leaving Palo Alto will cause back ups into downtown and on Middlefield. This, in turn, will prevent the movement of emergency vehicles, risking loss of life. It will certainly begin to make both Stanford and Palo Alto dysfunctional for hours each day.

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As far as I can tell there is no plan to mitigate this.

Richard Almond, MD

[REDACTED]

Palo Alto

5.2.3.4 Responses to Comments from Richard Almond

I-Almond-1 As illustrated in Figure 5.15-1 and presented in Table 5.15-1 of the Draft EIR, the analysis of University Avenue and Middlefield Road is represented by 20 intersections (Intersections # 21, 46, 47, 59, 60, 61, 62, 63, 64, 65, 66, 69, 78, 79, 80, 81, 92, 93, 94, and 95). 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. Where significant impacts are anticipated to occur absent satisfaction of the no net new commute trips standard, physical intersection improvements are identified if improvements are feasible. The Draft EIR also evaluates the potential for cut-through neighborhood traffic in Crescent Park (Impact 5.15-5) and concludes that, even if the no net new commute trips standard is not achieved, the project would not result in a significant impact associated with neighborhood traffic. Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

While not associated with the proposed Project, it should be noted that the University Avenue traffic signals are currently being studied for synchronization between Middlefield Road and the Dumbarton Bridge.¹ The study aims to improve travel time and reliability along main thoroughfares or arterial streets. The study will also evaluate traffic calming measures, such as planters and signage in Crescent Park.

Impact 5.15-7 on page 5.15-11 of the Draft EIR addresses effects on emergency access. The Draft EIR recognizes that, while the proposed Project might increase congestion at local intersections, emergency responders are charged with developing fastest-response travel routes and developing alternative routes in real time to provide emergency services. Therefore, the identified significant impacts at area intersections would not result in inadequate emergency access within the traffic study area. Further, page 5.13-11 of the Draft EIR explains why increased emergency response time is not considered to 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 would in turn result in a significant adverse environmental impact. Please see generally Master Response 13: Transportation and Traffic, and in particular Topics 2 through 8.

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

¹ See <https://www.paloaltoonline.com/news/2018/08/01/university-avenue-traffic-signals-to-be-synchronized>.

Comment Letter I-AltamiranoA

From: [Antonio Altamirano](#)
To: [Rader, David](#)
Subject: [COMMENTS FROM FAMILY w/ 4 SMALL CHILDREN] Stanford Application for the 2018 General Use Permit
Date: Wednesday, January 31, 2018 10:27:13 PM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
[70 West Hedding Street, San Jose, CA 95110](#)
Phone: [\(408\) 299-5779](#)
Email: David.Rader@pln.sccgov.org

To Whom It May Concern,

Our family has lived on [REDACTED] in the Stanford Weekend Acres neighborhood for over 10 years. We have seen an incredible increase in traffic in the past few years and it has become unbearable. We have 4 children, 3 are school age, and we feel like we are taking our lives into our hands twice a day when we make the walk along Alpine Road to the bus stop on Bishop Lane. On at least 4 different occasions, our family has had to literally jump out of the way of a car that was driving too fast and distracted by a cell phone and almost rear-ended the car in front, and instead veered into the path, right where we were walking. This could have been catastrophic.

Cars and trucks are almost always driving at high speeds, often veering into the bike lane and pedestrian path. The school bus often has to wait several minutes for cars to slow down in order to merge back onto the road. At one time, the CHP and school district entertained the idea of eliminating this bus stop altogether since no one was following the laws of stopping for the bus. It was mindblowing to me that the powers that be would consider doing this instead of enforcing the laws of having cars STOP for the school bus STOP sign and making it a safe stop for students. The only time when the traffic is moving at a safe pace is when there is a police presence. Since we are in unincorporated San Mateo County, we have to rely on the already stretched thin high way patrol. Recently, there has been collaboration across other patrol areas to have additional patrol cars out, but the county must pay these officers overtime and the police chief has explained to me that this is unsustainable with the current budget.

Stanford claims that there will be no new net trips, but I do not think they are taking into account the uber, lyft, and taxi rides, the delivery trucks from Amazon, frequent visitors, the maintenance and repair teams that have to come out to support the ever-growing university.

It is incredibly important that we maintain this unique neighborhood for ALL to enjoy.

We are asking for:

- Slower speeds
- Traffic lights and other things to slow traffic down so that we can actually exit our neighborhood safely that Stanford will pay for
- Daily police monitoring during school bus times
- Make Alpine a no truck route
- Barriers put up to protect the pedestrians and bikers from the vehicle traffic

Please be proactive and listen to our concerns. We fear that a catastrophe--like a child being hit or killed--is a real possibility and only then will our concerns be addressed.

Sincerely,
Rebecca Padnos Altamirano
[REDACTED]

Comment Letter I-AltamiranoA



Antonio Altamirano

[Tangelo](#) | CEO, Founder



IMG_4068.mov

5.2.3.5 Responses to Comments from Antonio Altamirano

- I-AltamiranoA-1 This comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 1: Non-CEQA Comments. See also Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.
- I-AltamiranoA-2 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on how cut-through trips (e.g., rideshare services, deliveries, etc.) are accounted for in the monitoring of the no net new commute trips program.
- I-AltamiranoA-3 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-AltamiranoA-4 Please see Response to Comment I-AltamiranoA-1, above.

Comment Letter I-AltamiranoR

From: [Rebecca Altamirano](#)
To: [Rader, David](#)
Subject: Stanford Development Concerns
Date: Friday, February 2, 2018 2:55:53 PM

Hi David,

My husband and I sent you a previous email with concerns about the dangerous traffic on Alpine Road. We have 4 young children and walk along Alpine to go to the school bus stop as well as to walk the dish. I want to point out one additional data point. It was very interesting to see the decrease in traffic over Stanford's winter break this past December and January. There were far fewer cars and trucks and the speeds were much lower, in general. We believe that so many of the traffic problems are the result of faculty, staff and support services going to Stanford campus. We believe that Stanford is manipulating the numbers to tell a better story about the impact their traffic is having on the greater community. Stanford Weekend Acres is a unique neighborhood that needs to be preserved and it is of the utmost importance that grand efforts are made to decrease the negative impact that Stanford is having on the community.

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Thank you for listening to these concerns,

Rebecca Padnos Altamirano

[REDACTED]

5.2.3.6 Responses to Comments from Rebecca Altamirano

- I-AltamiranoR-1 Please see Response to Comment I-AltamiranoA-1, above.
- I-AltamiranoR-2 Please see generally Master Response 13: Transportation and Traffic, for a discussion of how the traffic and transportation analyses were conducted. With regard to the comments about preserving the neighborhood, please see Response to Comment I-AltamiranoA-1, above.

Comment Letter I-Andersen

From: [Kristen Andersen](#)
To: [Rader, David](#)
Subject: Stanford General Use Plan
Date: Thursday, February 1, 2018 10:41:41 PM

Dear Mr. Rader,

I am writing you to urge you to deny or significantly limit Stanford's expansion plans. Our community can not handle the increased traffic and strain on our schools that would result from expansion.

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I have lived on [REDACTED] in Palo Alto since 2005. In the past few years our quality of life has deteriorated due to increased traffic. I have attached a photo from the evening commute. Drivers avoid University Avenue by taking Hamilton Avenue and cutting over on West Crescent, Center and East Crescent. West and East Crescent are not wide enough for two-way traffic when there are cars parked on the street. So, when there is traffic congestion I am not able to access my home or able to leave. All of this traffic also has a negative impact on the community when it comes to noise and air pollution. I have two kids with asthma. One who is on steroids everyday. This is not a healthy environment for them or any of the residents who are affected by this traffic.

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The county needs to make Stanford contribute more financial resources and intellectual resources to helping solve the problems it creates. Stanford ask for concessions, but it has not been a good neighbor in return. One recent example is the gym construction at Palo Alto High School. For the past two years the gym has been under construction. Palo Alto High School ("PALY") is right across the street from Stanford and has ample athletic facilities that it could have shared, but the University refused PAUSDs facilities request citing a decision to not rent out space to third parties. This meant PALY athletes spent significant time traveling to practices held at facilities as far away as Mountain View and East Palo Alto, creating more stress for our students. Since PALY did not have enough SPAB certified drivers at the time these facilities were available in other cities, PALY spent thousand of dollars each week on charter transportation which got billed to the bond - a waste of taxpayers money. However, Stanford continued to ask PAUSD to use their facilities for parking for football games. Stanford coaches used PAUSD facilities to run their club programs. It has not been a reciprocal relationship.

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Stanford says they plan to move people out of their cars, but how do they plan to do this and how will they be held accountable? The expansion of Caltrain capacity expected with electrification has already been "consumed" by previous projects. If they get out of their car and take a ride share instead, that would result in more cars on the road, not the "no net new traffic" that the plan promises. Traffic is already intolerable. I urge the the county to delay any expansion decision. Instead the county should ask Stanford to contribute resources to help address the traffic challenges the community faces today. Decision on expansion plans should be deferred and conditioned on the ability of Stanford to get people out of their car today and make verifiable traffic improvements, so that the county could be reasonably certain that any expansion would have no negative impact on the greater community.

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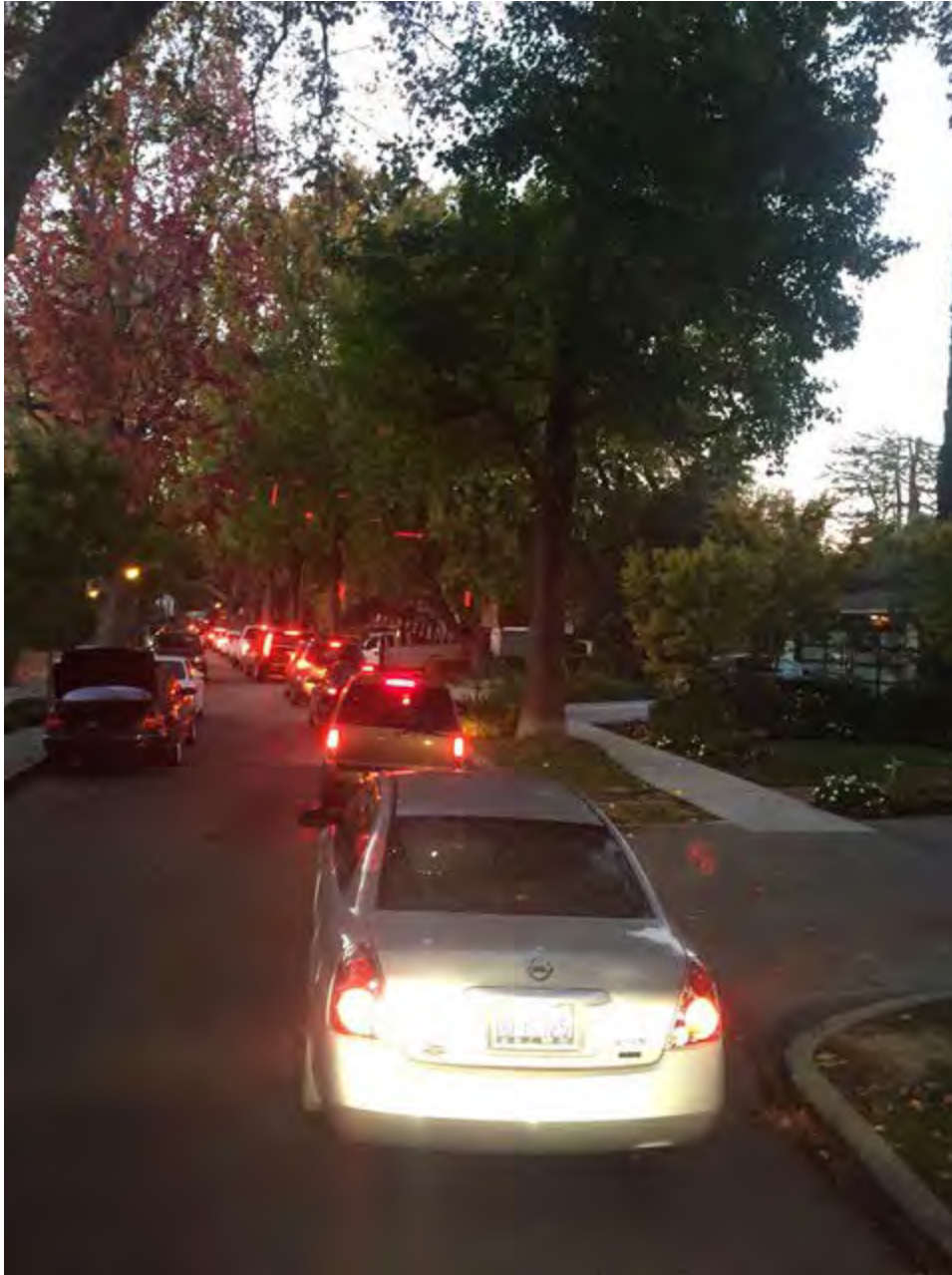
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Comment Letter I-Andersen

Respectfully,

Kristen Andersen

Palo Alto, CA 94301



5.2.3.7 Responses to Comments from Kristen Andersen

I-Andersen-1 The comment made requesting denying or limiting Stanford plans is noted. This is a matter for the County Board of Supervisors to ultimately decide. This comment does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Regarding the comment that the community cannot handle the traffic and strain on schools from the Project expansion, please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR, Section 5.13, Public Services, and Section 5.15, Transportation and Traffic which address all Project and contribution to cumulative impacts to public schools and traffic associated with the construction and operation of the proposed Project.

I-Andersen-2 This comment is in regard to an existing condition, not related to the proposed Project. Please see Master Response 1: Non-CEQA Comments.

I-Andersen-3 This comment is in regard to an existing condition, not related to the proposed Project. Please see Master Response 1: Non-CEQA Comments.

I-Andersen-4 This comment is in regard to an existing condition, not related to the proposed Project. Please see Master Response 1: Non-CEQA Comments.

Please also see Draft EIR, Section 5.2 Air Quality, and Section 5.11, Noise and Vibration, which address all Project and contribution to cumulative air quality and related health risk impacts, and noise impacts, associated with the construction and operation of the proposed Project.

I-Andersen-5 Regarding the comment made that requests for Stanford to contribute more financial resources, please see Master Response 1: Non-CEQA Comments.

The Draft EIR identifies mitigation measures where required, including funding fair share of improvements to mitigate all significant Project and cumulative impacts from the proposed 2018 General Use Permit to the extent feasible.

I-Andersen-6 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Power's Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input, and 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 in the future.

I-Andersen-7 Please see Response to Comment I-Anderson-2 and Response to Comment I-Anderson-5, above.

Comment Letter I-Appel

From: [REDACTED]
To: [Rader, David](#)
Cc: univpark@univpark.org; mcallagy@smcgov.org; city.council@menlopark.org; dshu@smcgov.org; [Dave Price](#); bwood@almanacnews.com
Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Saturday, December 2, 2017 8:22:57 AM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street, San Jose, CA 95110
Phone: [\(408\) 299-5779](tel:(408)299-5779)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

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The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

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1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

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It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

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The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

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In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-

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Comment Letter I-Appel

engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

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The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

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Sincerely,
David Appel

BACKGROUND INFO/RESOURCES:

- Introduction news release about GUP from Stanford <https://news.stanford.edu/2017/06/15/planning-future-stanford-physical-campus/>
- **SUPER SHORT:** Stanford Brochure of 2018 General Use Plan (GUP) draft Environmental Impact Review (EIR) <https://drive.google.com/file/d/0B0BM4gZWP7M6U3JDNHRCWnAzcUU/view>
- **SHORT:** Stanford Summary of draft EIR <https://drive.google.com/file/d/0B0BM4gZWP7M6eFF3eWdvSVQ1LTg/view>
- **Nov 15** Community Meeting Regarding the Stanford University 2018 General Use Permit Draft Environmental Impact Report
 - Who: Hosted by Santa Clara County Planning Department
 - When: Wednesday, **November 15, 2017** 6:30 PM-8:30 PM
 - Where: Menlo Park City Council Chambers
 - Why: The purpose of the meeting is receive comments, questions, and opinions from the public regarding the Draft EIR for Stanford University's 2018 General Use Permit.
- **Nov 30** Santa Clara County Planning Commission Meeting Announcement <https://gup.stanford.edu/the-project/schedule>
- For folks who want to read through more detailed info: <https://gup.stanford.edu> OR from the Santa Clara County website: <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Stanford.aspx>
- For info about the draft EIR prepared by Santa Clara County https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/GUP2018_CEQA.aspx
- Check out p. 30 of the "Agency Comments" where SMC Planning and Building Dept. provided feedback in Feb 2017 to a portion of the GUP. https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU_GUP2018_ScopingMeeting_AgencyComments.pdf.
- Stanford presented to San Mateo Board of Supervisors Tuesday, Nov 7, 2017 - http://sanmateocounty.granicus.com/MediaPlayer.php?view_id=1&clip_id=137&meta_id=31270. The discussion is quite revealing as to how San Mateo County has missed out on 2000 GUP mitigation funds and will continue with the proposed 2018 GUP as it stands. Dave Pine asks some probing questions.
- Here is a link to the video of the **April 25, 2017 BOS** GUP presentation by Stanford with Santa Clara Planning to the BOS. <https://www.youtube.com/watch?v=MKz6RJvdrRg&index=106&list=PLvrcFuwLyzqO9lwr8kicJTSAYAlAUaQ1T&t=6119s>
 - Stanford's presentation starts at 1:15.
 - A key part to watch is after the presentation at 1:36 when Sup. Horsley states that SMC is disproportionately affected, especially Alpine Rd.
 - At 1:50 Dave Pine asks Stanford (Catherine Walther and Santa Clara County (Kirk Girard, Director of Planning and Development) to comment on the lack of mitigation for SMC. Mr. Girard says, "we don't have the social infrastructure" to share. Sup. Pine said that the document should acknowledge that the County should "be a recipient of traffic mitigation funds" yet this was not written into the draft EIR prepared by Santa Clara County

5.2.3.8 Responses to Comments from David Appel

I-Appel-1 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.²

To the extent there is a safety concern at the Alpine/ Santa Cruz/ Alameda de las Pulgas Corridor, this is an existing condition and not an impact of the proposed 2018 General Use Permit. The County of San Mateo is conducting a study to address the neighborhood concerns.³ As part of the proposed Project, Stanford has offered to fund a set of bicycle facility improvements at the Alameda de las Pulgas Corridor in unincorporated San Mateo County that would be determined as part of San Mateo County's study. Please see Chapter 8, Special Considerations, of the Draft EIR.

Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Appel-2 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, which addresses the concern that trip credits might reduce trips in some travel corridors, while not reducing trips in others.

I-Appel-3 As noted above in Response to Comment I-Appel-1, the County of San Mateo is conducting a study to determine the appropriate configuration for improvements along Alameda de Las Pulgas, while addressing neighborhood concerns. Stanford has stated that it has offered to fund the bicycle facility improvements that would

² City of Menlo Park, ConnectMenlo Final EIR, certified on November 29, 2016.

³ See <https://publicworks.smcgov.org/santa-cruz-avenue-corridor-study>.

be determined as part of San Mateo County’s study. Please see Draft EIR Chapter 8, Special Considerations.

Under Mitigation Measure 5.15-2, if Stanford funds or provides trip reduction programs outside the campus cordon, Stanford can request that the Planning Office approve credits.⁴ The process for approving the credits would be similar to the process followed during implementation of the 2000 General Use Permit. Mitigation Measure 5.15-2(5) explains that the County Planning Office would determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate, and the County Planning Office will require that Stanford provide evidence of its participation in the program in a manner that can be independently verified. Similarly, any proposal for credits associated with funding of off-campus circulation infrastructure improvements would be reviewed by the County to determine how and to what extent the infrastructure project would remove vehicular trips from the local impact area. 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.

I-Appel-4 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 for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).

I-Appel-5 Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, then Mitigation Measure 5.15-2 requires Stanford to pay a fee based on Stanford’s fair share of the cost of improvements for adversely affected intersections. The Draft EIR on pages 5.15-88 through 5.15-90 describes the improvements at adversely affected intersections and roadways. Mitigation Measure 5.15-2 explains that the County would use the fees to fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office would consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for the

⁴ 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.

intersection improvements is infeasible, the County will use the funds for other trip reduction programs in the local impact area. As explained above, 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.

I-Appel-6 Please see Response to Comment I-Appel-1 for a discussion of the Draft EIR impact evaluation of Alpine Road, Santa Cruz Avenue, and Alameda de las Pulgas. Further, as described on page 5.15-102 of the Draft EIR, the Menlo Park neighborhoods, of Allied Arts, Central Menlo Park, and University Heights were considered as part of the Neighborhood Impact Analysis. Please also see Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps.

With regard to bike and pedestrian improvements, as discussed in Chapter 8 of the Draft EIR, Stanford proposes to fund four sets of off-site bicycle facility improvements in communities surrounding Stanford, including the cities of East Palo Alto, Palo Alto, and Menlo Park; and unincorporated San Mateo County. These improvements are subject to approval by each jurisdiction in which they are located. The proposed funding for off-site bicycle facility improvements is intended to reduce the potential for local vehicle congestion effects by encouraging use of alternative modes of transportation. Please see Chapter 8 of the Draft EIR, commencing on page 8-1, for more information regarding the four sets of bicycle facility improvements that Stanford has offered to fund.

Please refer to Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for additional discussion of bicycle infrastructure improvements, and Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods.

With respect to the Marguerite shuttles, the shuttles can be expanded and contracted to meet the demands on the system at any point in time. As such, no mitigation measure is warranted to address capacity.

I-Appel-7 Please see Response to Comment I-Appel-1 for a discussion of the Draft EIR impact evaluation of Alpine Road, Santa Cruz Avenue, and Alameda de las Pulgas. The Draft EIR does not limit the analysis of the Project's environmental effects to Santa Clara County. Please see Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps, and Topic 8: Neighborhood Street Impacts.

Comment Letter I-Assistant

From: [Assistant](#)
To: [Rader, David](#)
Subject: Draft EIR- Stanford Expansion
Date: Monday, November 27, 2017 11:45:14 AM

Hello David,

I am writing to ask that your committee think about the horrible traffic ramifications of this plan WHILE THEY ARE DOING CONSTRUCTION!!! El Camino Real was backup up for miles last night because of the ongoing construction which had a one whole lane blocked on a critical 2 lane only part of El Camino DURING RUSH HOUR 4-6 pm. THIS HAS GOT TO STOP!! THERE MUST BE A TRANSPORTATION COMPONENT TO THIS STANFORD PLAN THAT ALLEVIATES THIS INSANE TRAFFIC NOT ONLY WHEN THE BUILDING IS COMPLETE BUT ALSO WHILE IT IS UNDER CONSTRUCTION. There must be a comprehensive plan that extends safe bike paths (NOT BIKE LANES ON BUSY STREETS WITH GREEN PAINT!!!), creates new bike paths, builds new parking lots close to freeways 101/ dunbarton bridge and 280 at alpine and page mill and has safe bike paths and bus service to the different buildings and companies in the Valley. We HAVE GOT TO TAKE THE CARS AWAY FROM THE SMALL CITIES. WE HAVE GOT TO GET WITH THE PROGRAM AND PROVIDE ROBUST AND COMPREHENSIVE COMMUTE OPTIONS. WE HAVE A RAIL LINE SITTING THERE DOING NOTHING FROM FREMONT TO MENLO PARK. REQUIRE STANFORD AND APPLE AND GOOGLE TO PUT MONEY TOWARDS MAKING THIS ROUTE A VIABLE BIKE OPTION AND IN THE FUTURE RAIL BEFORE THEY CAN BUILD ANYTHING ELSE!!!!!! They have plenty of \$\$ and resources. PLEASE DON'T LET THEM BUILD MORE WITHOUT FIRST creating this much needed transportation/commute infrastructure.

1

2

5.2.3.9 Responses to Comments from Assistant

- I-Assistant-1 The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual projects permitted pursuant to the 2018 General Use Permit.
- I-Assistant-2 The purpose of the Draft EIR is to analyze the effects of future development under the 2018 General Use Permit. Please refer to Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. For an analysis of the Project’s cumulative impacts on road and freeway segments, please see the Draft EIR’s discussion of Impacts 5.15-9 and 5.15-10 on pages 5.15-112 through 5.15-141.

Comment Letter I-Ayala

Full Name / Nombre Completo: Maria Elena Ayala Date / Fecha: 1-28-18

Email Address (optional) / Correo Electrónico (opcional):

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

RVS

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

1 - Stanford necesitamos que sea responsable.
Con sus trabajadores y no afecte nuestra Comunidad. 1

2 - No hagan cosas que no son no digan mentiras
Con las cifras queriendo pagar \$20 Por pie Cuadrado
Cuando la realidad es otra 2

3 - Necesitamos ayuda que piensen mas en Viviendas
para gente de bajos ingresos y no tengamos
que irnos a otro lugar tenemos hijos estudiando
en nuestra Comunidad. tenemos nuestros trabajos
tenemos muchos años viviendo en esta
Comunidad. necesito que piensen en la gente.
que tenemos trabajos en los cuales no ganamos
suficiente Como pagar un departamento tan Caro
necesitamos ayuda no que empeoren nuestra
situación necesitamos ser escuchados. Por favor 3

I-Ayala

Spanish to English translation of letter:

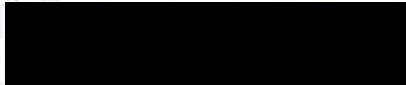
1. *We need Stanford to be responsible with their workers and not impact our community.*
2. *Do not tell things that aren't....Don't tell lies with numbers...wanting to pay \$20 per square foot when the reality is something else.*
3. *We need help. We need them to give more consideration to low income housing in our community – where our kids are going to school and where we work, so we don't have to move somewhere else. We've been living in the community for many years and need them to think about the people like us, whose jobs don't pay enough to cover the expensive rent. We need them to help us, not make our situation worse. We need to be heard. Please.*

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuando determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
- ☒ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
- ☒ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

Maria Elena A.H.



5.2.3.10 Responses to Comments from Maria Elena Ayala

I-Ayala-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Ayala-2 The amount of affordable housing fees is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. 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.

I-Ayala-3 Regarding the impacts of the Project on affordable housing, please see responses to Comments I-Ayala-1 and I-Ayala-2 above. 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.

I-Ayala-4 Please refer to Response to Comment O-SCOPE-15.

I-Ayala-5 Please refer to Response to Comment O-SCOPE-10.

I-Ayala-6 Please refer to Response to Comment O-SCOPE-3.

I-Ayala-7 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. The County Board of Supervisors, as the decision-making body for the 2018 Stanford General Use Permit, will determine any 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed, and considered the adoption of an impact fee for any Stanford academic development.⁵ On September 25, 2018, the County Board of Supervisors voted to increase the

⁵ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

affordable housing fee within the Stanford Community Plan area to \$68.50 per square foot effective July 1, 2020.

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

I-Ayala-8 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. See also Response to Comment I-Ayala-3, above.

Comment Letter I-Barman

From: [Neil Barman](#)
To: [Rader, David](#)
Cc: plngbldg@smcgov.org; mcallagy@smcgov.org; city.council@menlopark.org; dshu@smcgov.org; bwood@almanacnews.com; [Dave Price](#)
Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Friday, December 1, 2017 9:24:18 AM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street, San Jose, CA 95110
Phone: [\(408\) 299-5779](tel:(408)299-5779)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

1

The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2

2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

3

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

4

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

5

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

6

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

7

Comment Letter I-Barman

Sincerely,
Neil C. Barman, M.D.
San Mateo County Resident

Neil C. Barman, M.D.

[REDACTED]

5.2.3.11 Responses to Comments from Neil Barman

- I-Barman-1 Please see Response to Comment I-Appel-1.
- I-Barman-2 Please see Response to Comment I-Appel-2.
- I-Barman-3 Please see Response to Comment I-Appel-3.
- I-Barman-4 Please see Response to Comment I-Appel-4.
- I-Barman-5 Please see Response to Comment I-Appel-5.
- I-Barman-6 Please see Response to Comment I-Appel-6.
- I-Barman-7 Please see Response to Comment I-Appel-7.

Comment Letter I-Bayer

From: [Jen Bayer](#)
To: [Rader, David](#)
Subject: Comments on the Stanford GUP permit application and EIR
Date: Friday, February 2, 2018 4:56:38 PM

Dear County Supervisors,

We're writing to ask you to think about Stanford as an eminent university that has already endured for 126 years and may persist for centuries more, and as one that has reached this point in its existence when Earth and humankind are far different from what we've been for virtually all of the 300,000-years that humans have occupied the planet.

Universities are among the most long-lasting of human institutions. Stanford is older than governments of almost all UN member states. It has outlived all but a handful of businesses that existed at its founding. Of the initial companies in the Dow Jones Industrial Average, created five years after Stanford was born, all but General Electric have ceased to exist. Prominent universities elsewhere, including Oxford and a dozen more, are older than any of the Protestant dominations of Christianity. This is staying power.

We imagine that Stanford trustees hope for Stanford to be here centuries from now. We ask that as you plan for the future of Stanford, you support their aspirations by adopting a long-term perspective.

We feel that we've been given an immense gift to grow up next door to Stanford. For as long as we can remember, we've benefitted in numerous ways. However, in recent years as we've seen traffic congestion increase, housing prices skyrocket, and millions of square feet of new construction spring up on campus and nearby, we've wondered more and more about limits to growth in general, about limits to growth in this area, and about limits to growth at Stanford. When does growth stop being beneficial and become destructive?

From what we've been able to learn university personnel agreed at the time of a prior GUP to set a limit to Stanford's ultimate size and have yet to do so. In the current GUP they've declined to set such a limit. People who understand basic ecology know that on a finite planet growth of any physical entity is constrained and must end.

Stanford trustees, relying on the 1.2% annual growth that has occurred during the less than 20-year period for which the current GUP has been in effect, propose to continue this rate. Even though Stanford has grown at this speed recently, the next 15-20 years may be very different times for the university, surrounding communities, and Earth. Using the past as a guide in this instance may be like thinking we can fly after jumping off a twenty-story building and falling ten. We've abundant evidence that current carbon emissions, groundwater depletion, and population growth can continue only at our peril.

If we imagine that Stanford will continue to grow at 1.2% annually, and that it will someday be as old as Oxford, the 10 million square feet on campus today will be 1.2 trillion(!) square feet at that time. That's 43,000 square miles, about the land area of the State of Pennsylvania. Even the most avid Stanford booster will likely agree that this is a bit much. Well, maybe. So the question becomes, "When was it or will it be too much?" Before we reached current size? Somewhere in the period covered by the proposed GUP? Sixty years from now when 1.2% annually will result in a doubling?

The 1.2% growth rate claimed by Stanford trustees may be just the tip of the iceberg. Trustees have made the proposed GUP less easy to assess by splitting housing from other campus growth and describing the former in terms of units and the latter in terms of square feet. They propose to build 3,150 housing "units." If these range from studio apartments to multi-bedroom homes we might obtain a rough estimate of their square footage by using an average of ~1,000 square feet/unit. This is more than 3 million square feet of added construction, and exceeds the proposed campus facility growth by 40%. This total growth represents an annual rate of 2.6%. Assuming as we did earlier that Stanford will someday be as old as Oxford and has grown at this rate from now until then, it will cover all the land on Earth with a 527-story building. (That was just for your and our amusement/horror.)

Some may argue that housing is somehow exempt from being included as part of growth. We've too little expertise to state with confidence how to account for it. We do know that people will live in it, travel to and from it, and

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Comment Letter I-Bayer

require public services like schools, sewers, water, electricity, and gas, and private services like food, clothing, and entertainment, all of which have impacts just as real as those of activities associated with campus facilities. In the long term, impacts of one square foot of housing may be equal or greater than those of a square foot of other campus development. They certainly are greater than nil.

When Oxford was the same 126 years old that Stanford is today, trustees had little ability to foresee what was to come in the next millennium. Had someone approached them with the idea of limiting growth, they might have dismissed it without question. We live in very different times. When Oxford was founded, world population was ~300 million which is ~4% of what it is today. At the time, depletion of Earth's resources and disruption of the global ecosystem, though already underway, had yet to reach anything approaching what they are today.

Those of us in our teens today will almost certainly see a reduction in human population and a decrease in maintained building and paving. Stanford University faculty Paul Ehrlich, the late Steven Schneider, Pamela Matson and others, have been teaching about this turnaround for decades. When we were young children, we walked and biked at Stanford with our parents, and practiced reading signs in public places. One that we've discussed often is on a statue of the Stanford family near the Mausoleum. It reads: "Dedicated to science and the good of humanity."

We wonder whether including in the proposed GUP a longer-term—say even fifty or a hundred years—limit on Stanford growth to provide a guide to safely navigating the very dangerous few decades ahead, may be beneficial to the university, the surrounding community, and the world. Perhaps this is means to honor the founders' intent both to create a university and to ensure that it serves common good in perpetuity.

Jen and Hilary Bayer

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cont.

5.2.3.12 Responses to Comments from Jen and Hilary Bayer

I-Bayer-1 Please see Master Response 1: Non-CEQA Comments; and Master Response 3: General Comments on EIR and Environmental Topics.

Regarding the comment discussing Stanford's ultimate size, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study.

A comment asserts the campus will exceed the proposed campus facility growth by 40 percent, and represent an annual growth rate of 2.6 percent. However, these numbers cited are not accurate or meaningful in the characterization of growth at the campus. The comment incorrectly estimates new on-campus student and faculty staff housing would amount to 3.15 million square feet. In fact, Stanford estimates the square footage of the 2,600 student housing beds would be an estimated 1.225 million square feet, and when combined with the 550 faculty and staff units, the total new on-campus housing would account for approximately 1.8 million square feet. Secondly, it is inaccurate to add the annual average growth rates of academic and housing together as was done in the comment.

Regarding the statement that housing requires schools, public services, and utilities. Impacts from the proposed 2018 General Use Permit, including on-campus housing, on public schools, public services, and public utilities are addressed in Draft EIR Sections 5.13 Public Services, and 5.16 Utilities and Service Systems.

See also Master Response 9: Population and Housing Methodology and Calculations.

28 January 2018

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

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

Dear Mr. Rader:

I submit the following comments on Stanford's Draft EIR:

1. Exceedance of carrying capacity of local communities: Stanford's proposed growth in faculty and student numbers and development of land use exceeds the carrying capacity of its surrounding communities. This capacity exceedance can be seen in bottlenecked local traffic at peak hours on Embarcadero, Arastradero, and El Camino Real as commuters access the 101 and 280 freeways.

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2. Inability of Stanford's Traffic Demand Management Program to adequately mitigate current impacts, let alone the proposed additional impacts: Stanford's self-styled "world class" TDM program cannot adequately mitigate current traffic and Caltrain impacts, let alone the proposed incremental additional impacts. Peak hour traffic will increasingly spill into previously-peaceful neighborhoods, and off-peak travel hours will continue to shrink. Caltrain is already packed during commute hours even with the recent addition of a sixth passenger car, yet the TDM unrealistically seeks to further stuff commuters onto the train.

2

3. Emergency vehicles will find it increasingly difficult to adequately respond to medical, police, and fire emergencies: A case in point is southbound Arastradero during the morning commute—an emergency vehicle could already find it infeasible to reach its destination, and then local hospitals, within the critically-needed timeframe. Response times will further degrade if Stanford is allowed to impose additional traffic.

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4. The EIR analyzes Stanford's various impacts in an unrealistic, piece-meal fashion. While the proposed "Stanford" project is limited to campus growth and land use

4

Comment Letter I-Belick

Comment letter to Mr. Rader
Santa Clara County Planning Office
28 January 2018
Page 2

development, the impacts of Stanford cumulative recent development projects are far greater. These additional impacts include the huge Stanford Hospital and Packard Children's Hospital projects and the continued major traffic impacts of the Stanford Research Park. Stanford's impacts are properly analyzed in holistic fashion, and not piece-meal as is done in the Draft EIR.

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cont.

5. The County can negotiate a maximum buildout with Stanford: While a maximum buildout level is not proposed in the Stanford EIR, the County can negotiate such maximum levels as a condition of permit approval. Stanford's public statements that "their mission depends on growth" is an insufficient basis to justify the proposed impacts, and the County is under no obligation to buy into this assertion. This assertion is especially hard to accept given that Stanford enjoys significant tax exemptions. If such growth is believed important, advances in communication technology allow constructing satellite campuses in areas of cheaper housing in other communities.

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6. The proposed student and faculty population increases would significantly impact local schools: Adding thousands of graduate students and faculty would further burden local school districts. A case in point is the Palo Alto Unified School District, which continually runs multi-million dollar deficits even during the current good economic times.

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7. Stanford should be compelled to add housing to fully match increases in the faculty and student population: With its available lands and handsome endowment, Stanford has the resources to build additional housing on a 100% basis. The heated real estate market in the surrounding communities, exacerbated by Stanford's reported existing program of purchasing homes in the local market, will only be made worse. The heated market already imposes huge burdens on local families and infrastructure. Stanford's non-professional support staff will find it increasingly infeasible to live locally, again worsening local commutes and impacts on families.

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Respectfully submitted,

Thomas J. Belick
Stanford MS Engineering '74
Palo Alto, California

5.2.3.13 Responses to Comments from Thomas Belick

- I-Belick-1 A general comment is made about Stanford’s proposed growth exceeding carrying capacity of surrounding communities. Due to lack of specificity, no specific response can be provided; please see Master Response 3: General Comments on EIR and Environmental Topics.
- Regarding existing traffic conditions please see Master Response 1: Non-CEQA Comments.
- I-Belick-2 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic, Topic 6: No Net New Commute Trips Standard for explanation of the feasibility and effectiveness of the no net new commute trips program, including the ability to expand the program to reduce more vehicle trips in the future, and Topic 5: Intersection Impacts and Mitigation for discussion of the feasibility of alternate mitigation if the no net new commute trips standard is not met.
- I-Belick-3 Please refer to Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- I-Belick-4 With respect to how the Draft EIR accounted for non-Project related Stanford developments, including the Stanford University Medical Center (SUMC) and Stanford Research Park 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.
- I-Belick-5 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study.
- I-Belick-6 A general comment is made that the proposed student and faculty population would significantly impact local schools. The Draft EIR Section 5.13 addresses all Project and cumulative impacts to public schools. Please also see Master Response 12, Public Schools for additional information.
- A comment is also made that the Palo Alto Unified School District is running existing deficits; this comment does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Belick-7 On June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-Bender

From: [Dorothy Bender](#)
To: [Rader, David](#)
Subject: Comments Re: Stanford University Draft EIR on the GUP
Date: Thursday, February 1, 2018 8:47:11 PM

To: County of Santa Clara, Department of Planning and Development
Attention: David Rader
County Government Center
[70 West Hedding Street, San Jose, CA 95110](#)
Phone: [\(408\) 299-5779](#)

Comments Re: Draft EIR Stanford University General Use Permit

Santa Clara County should require that Stanford University's GUP application include the following:

(1) not worsen the housing shortage.	I 1
(2) establish a maximum build-out for the University	I 2
(3) extend protections of the foothills as permanent open space.	I 3
(4) not worsen traffic.	I 4
(5) adopt a policy of carbon neutrality for all new construction.	I 5

Respectfully Submitted,

Dorothy Bender
Palo Alto, CA



5.2.3.14 Responses to Comments from Dorothy Bender

I-Bender-1 Please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Please also see Master Response 9: Population and Housing Methodology and Calculations, and Master Response 10: Affordable Housing

I-Bender-2 Regarding the comment that the Project should establish a maximum buildout, 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.

I-Bender-3 Regarding the comment that the Project should extend protections of the foothills as permanent open space, this comment does not address the adequacy of the Draft EIR. Please also see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

I-Bender-4 Section 5.15 of the Draft EIR analyzes the Project's traffic impacts. Additional information is provided in Master Response 13: Transportation and Traffic. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

I-Bender-5 This comment requests that the County adopt a policy of carbon neutrality for all new construction. This is a policy matter for the County Board of Supervisors to consider. Section 5.7 of the Draft EIR analyzes the Project's GHG emissions consistent with CEQA requirements.



County of Santa Clara
Department of Planning and Development

Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.

Name: John Betts

Organization (if any): ~~State~~ Sacredheart housing action group -

Address (optional): [Redacted] Palo Alto, Ca. 94301

City, State, Zip: Palo Alto CA. 94301

E-mail: [Redacted]

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

I Think in all this talk of Stanford's expansion and the problems of the housing crisis, one thing needs to be made clear: Affordable housing doesn't say for who: But it's not affordable for low income people. There are many people who can't afford housing at all they sleep in vans, or cars if they're lucky - Many others who are desperately poor (have hardly any resources) have to ride the 22 bus all night to have any shelter at night. With all the wealth being generated in this area it's time to do a lot more for poorest people, not just let untold multitude continue to suffer along in the cracks of this so called progressive community - Most of the up scale well heeled people in this community are very ignorant of the lives of these suffering people - Some people are elderly or ill - Some just aren't able to get enough work to afford anywhere to live - I grew up in Palo Alto, my father ~~held~~ held a engineering degree from Yale and attended his degree from Stanford I see a lot of people's sets screwed when they sold their houses (see)



County of Santa Clara
Department of Planning and Development

Sold their house for \$700,000, to a developer who did some cosmetic improvements and resold it for half a million 6 months later - Many families have been driven to the street by the exceedingly greedy trends in Real estate in the last twenty years -

Many of us had roots here - now are driven out and the influx of the high end elite and tech industry minions - but there still needs to be housing for the underemployed, the unemployed, the elderly, the undereducated. We all make up the community and the community is enriched by the humble people as well as the glut of super achievers -

There was a character in this community that, gone now: there used to be venues for local musicians to perform in pubs and music venues - now there is no place to hear ~~the~~ live music - (I'm not talking about D.J.s and rap music over canned beats) My girl friends are artists - we are talented people and would do well - but we are part of the movement that is an undercurrent of people who want to have time in their lives for other things than having all their time used up in corporate lockstep -

Send comments to:

David Rader, Senior Planner

County Government Center, East Wing, 7th Floor

70 W. Hedding Street, San Jose 95110

david.rader@pln.sccgov.org

That's who can't afford housing & people who don't like the mighty dollar's accumulation or the be all and end all of life! We used to be able to live here all day on Artists, musicians and artists contribute a lot to the enrichment of the community but it's hard to do your art if there's no cheap places for artists and musicians and other creative people to be to develop their art - besides their car! Thank you! John Betts

5.2.3.15 Responses to Comments from John Betts

I-Betts-1 The comment expresses a number of personal opinions which do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

The comment also generally expresses a need for more affordable housing. Please note that June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed. Please also see Master Response 10: Affordable Housing.

Comment Letter I-Borock

From: [herb](#)
To: [Rader, David](#)
Cc: [BoardOperations](#); [Supervisor Simitian](#); [Loquist, Kristina](#); city.council@cityofpaloalto.org; city.clerk@cityofpaloalto.org
Subject: Stanford University 2018 General Use Permit Draft Environmental Impact Report, State Clearinghouse No. 2017012022
Date: Friday, February 2, 2018 4:48:38 PM

[REDACTED]
Palo Alto, CA 94302

February 2, 2018

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

STANFORD UNIVERSITY 2018 GENERAL USE PERMIT DRAFT ENVIRONMENTAL IMPACT REPORT STATE CLEARINGHOUSE NO. 2017012022

Dear Mr. Rader:

The California Environmental Quality Act (CEQA) provides that the following information is required in the Environmental Impact Report (EIR) to adequately and completely analyze the project and its reasonable alternatives, because there is substantial evidence that the information is needed to analyze the project and its alternatives.

Failure to supply any of the requested information below in the EIR is a prejudicial abuse of discretion and a violation of CEQA.

TIME POINTS REQUIRED

For each of the requested information the EIR must provide data for the (1) the date of adoption of the 2000 GUP, (2) today's date, and (3) the last date for which the 2018 GUP applies at full build out.

1

ACADEMIC AND ACADEMIS SUPPORT FACILITIES

CEQA requires that the whole of a project be analyzed.

There is substantial evidence that Stanford has academic and academic support facilities in the jurisdictions outside the area covered by the GUP, that Stanford is in the process of shifting some of those activities currently in the GUP area to places outside the GUP area, and that Stanford intends to continue placing such facilities outside the GUP area.

2

For each of the three time points, provide the address, total floor area, and total number of employees for each of the facilities and the specific function (e.g., Chemistry Department, Patent Office) located in each facility. If any

Comment Letter I-Borock

of these facilities is coterminous with an Assessor's Parcel Number, provide that number.

For each of the locations provided, indicate whether the land is exempt from taxation, or if not exempt from taxation, whether it is eligible for exemption.

2
cont.

HOUSING

There is substantial evidence that Stanford has student, faculty, and staff housing outside the area covered by the GUP.

For each of the three time points, provide the address, total floor area, the population served by the housing, and the number of students, faculty, and or staff in each location.

If any of these facilities is coterminous with an Assessor's Parcel Number, provide that number.

For each of the locations provided, indicate whether the land is exempt from taxation, or if not exempt from taxation, whether it is eligible for exemption.

3

MARGUERITIE SHUTTLE

There is substantial evidence that the location of Marguerite shuttle stops affects the traffic counts depending on whether the location is inside or outside of the traffic cordon.

For each of the three time points, provide the average daily traffic for each line; the peak boarding time and peak deboarding time and number of passengers boarding and leaving at peak times for each stop on each line; and whether each stop is inside or outside the traffic cordon.

4

CALTRAIN AND HIGH SPEED RAIL

There is substantial evidence that Stanford employees and students are a significant number of Caltrain passengers using the Palo Alto (University Avenue) and California Avenue Caltrain stops.

For each of the three time points, provide the average daily number of Stanford affiliated passengers using each of those two stations leaving and boarding those stations.

In the case of the third time point provide three versions of the data: (1) current Caltrain schedule; (2) completed Caltrain CalMod program; and (3) completed Caltrain CalMod program and completed California High Speed Rail peninsula segment.

5

STANFORD FOOTHILLS

There is substantial evidence that Stanford has approximately

6

Comment Letter I-Borock

1,250 acres of alienable land in the Felt Lake - Interdale area in unincorporated Santa Clara County on both sides of Highway 280. Unlike Founding Grant Land, the alienable land can be sold anytime the Stanford Board of Trustees chooses to do so.

Provide the Assessor's Parcel Number and acreage of each parcel of alienable land and a map showing the location each of those parcels in relation the GUP area.

Thank you for providing the requested information as required by CEQA.

Sincerely,

Herb Borock

↑
6
cont.

5.2.3.16 Responses to Comments from Herb Borock

I-Borock-1 CEQA requires future impacts of a project to be analyzed compared to a baseline condition, as was done for the Draft EIR. There is no requirement for the Draft EIR to provide data for the date of adoption of the 2000 General Use Permit.

Please refer to individual responses that follow; responses are provided for substantive comments that specifically address the adequacy of the Draft EIR. Please note that the comment does not indicate how any of the requested detailed data is relevant to the adequacy of the Draft EIR's evaluation of the Project's physical environmental impacts.

I-Borock-2 The comment correctly states that CEQA requires the whole of the Project to be analyzed. The proposed the 2018 General Use Permit is described in Chapter 3 of the Draft EIR.

With respect to how the Draft EIR considered all non-Project Stanford-related development, including institutional, commercial and housing development, please refer to 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, and 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.

Please note that the data requested at the level of detail for non-Project Stanford-related development in this comment, and for each data point identified in Comment I-Borock-1, above, is either extraneous and/or not germane to the Draft EIR analysis of the Project's physical environmental impacts.

I-Borock-3 With regard to off-campus housing for Stanford affiliates, please see Master Response 9: Population and Housing Methodology and Calculations.

With regard to the commenter's request for detailed information, please see Response to Comment I-Borock-2, above.

I-Borock-4 Whether a Marguerite shuttle stop is located inside or outside of the campus cordons does not affect the passenger vehicle traffic counts. A rider who enters the campus cordon on a Marguerite shuttle does not drive a vehicle onto the campus. It is unnecessary for the County to collect data as to the number of Marguerite riders who take shuttles into and within the campus because those riders are not creating external impacts by driving vehicles into and out of the campus.

By contrast, the County does receive data regarding the number of riders who take a Marguerite shuttle who do not enter the campus. This is because a Marguerite shuttle rider who never enters the campus (never crosses the cordon) may qualify

as a trip reduction credit. These credits recognize that Marguerite ridership that occurs outside the cordon reduces a vehicle trip outside the cordon in the impact area. To determine this credit, during the peak hours, Marguerite riders are counted on all routes and stops that are outside the cordon area, but that are inside the impact area. Boarding data is provided to Stanford by the shuttle operator.

Only boardings at stops where it is apparent that the rider alights within the credit zone (the green area in Figure 5.15-8 of the Draft EIR) are eligible for a credit. For example, boardings at the Palo Alto Transit Center are not counted if later stops on the same shuttle cross into the cordon count boundary. When Stanford applies for credits, Stanford provides the boarding data by stop location and Marguerite line. These data are peer reviewed by the County and its consultants as part of the annual traffic monitoring reports.

Stanford also provides Palo Alto Transit Center boarding data to Caltrain on a monthly basis, as required by a separate agreement between Stanford and Caltrain. Marguerite shuttle data is not shared beyond the data that is required for the County to calculate trip reduction credits and Caltrain's monthly request, as the Marguerite shuttle is a privately operated shuttle system. Because the Marguerite shuttle is a private shuttle system, the capacity and route planning are evaluated by Stanford and capacity is expanded when there is sufficient demand.

Please see also Response to Comment O-CARRD-14.

- I-Borock-5 For information regarding the number of Stanford campus employees and students who ride Caltrain, please see the Transit Capacity Analysis presented in Section 5.15.7 of the Draft EIR. The Transit Capacity analysis presented in the Draft EIR (and subsequent addendum report presented in Appendix TBC-ADD in this Response to Comments Document), shows that campus growth will not result in Caltrain capacity exceedances. The requested data regarding Stanford affiliate boardings of the Marguerite shuttle at the University and California Avenue Stations is not readily available.
- I-Borock-6 The comment refers to the Stanford foothills. The portion of the Stanford foothills within the General Use Permit boundary (i.e., the Project site), including Felt Reservoir, are subject to the 2018 General Use Permit. These foothills are described in the Draft EIR Chapter 3, Project Description, and all environmental impacts from the proposed 2018 General Use Permit within the Project site, including the foothills area, are addressed throughout the technical sections in the Draft EIR.
- The comment does not specify how the data requested for the Stanford foothills, and for each data point identified in Comment I-Borock-1, above, has a bearing on the environmental analysis in the Draft EIR analysis of the Project's physical environmental impacts.

Comment Letter I-BrownD

From: [Dick Brown](#)
To: [Rader, David](#)
Subject: Stanford EIR
Date: Tuesday, December 5, 2017 2:19:33 PM

To: David Rader – Santa Clara County Senior Planner

Re: Stanford EIR

Dear David,

The Stanford EIR states that Stanford has added about 1,400,000 square feet since 2000, and wants to add an additional 2,275,000 sq feet of buildings between now and 2035.

All of us who have lived in this area the past 15 years have seen the rush hour impact of the past 15 years of Stanford growth on Sand Hill Road, Page Mill Road, Alameda de Las Pulgas and Highway 280.

Yet, the EIR states that this growth has been and will be “less than significant”. This is not consistent with what Woodside, Menlo Park and Palo Alto residents have been experiencing, common sense, and what the EIR data state.

When I read the EIR, the data measuring traffic impact at key intersections leading into and out of Stanford show 54 of 95 intersections are graded as C ,D or F. and Sand Hill Road in particular is highlighted as failing to handle traffic flow adequately during peak commute times, and that is without the proposed additional traffic.

What I did not see in the study is how many vehicle trips were made in 2000, how much has traffic increased since 2000, and how much it will increase again with the proposed additional buildings, personnel and students by 2035? It looks to me that the EIR deliberately avoids addressing this obvious problem. You can’t add 3,500,000 sq feet of buildings and more than 10,000 personnel and students, without impacting traffic, yet that is what the EIR attempts to claim.

As the Stanford EIR states, the traffic growth mitigation measures Stanford has undertaken – in particular encouraging more use of trains and buses, has not worked the past 3 years as both train and bus usage to/from the Stanford campus has actually declined. Yet the EIR projects it will increase substantially over the next 20 years.

There is no mention of additional trips to/from the campus by people visiting the expanded hospital or Stanford personnel working in the 2,250,000 additional sq feet of buildings. Stanford projects the typical Stanford worker population will grow from 38, 851 to 49,428. These 10,000 additional workers and their visitors will be filling up the 2000 additional parking spaces proposed with vehicles. How is this additional traffic not going to impact already overloaded streets?

The EIR states there will be no air pollution impact from these additional 2000 + vehicle trips per day. I did not see a carbon footprint measurement for Stanford for 2000, 2018, or projected for 2035. What are the carbon footprint measurements for these periods ?

Stanford proposes removing significant numbers of trees to allow room for the 2,250,000 sq ft of buildings. How do they propose to mitigate this impact on the environment and air quality?

The EIR shows that Stanford water consumption will increase by 345,000 gallons per day by 2035. We just went through a serious drought and had to cut back water use 35%. How does Stanford propose to mitigate this negative impact?

I urge you to consider instructing Stanford to scale back the scope of the Stanford expansion plans,.

Comment Letter I-BrownD

I ask that you require Stanford to provide more specificity in the EIR on true traffic impact since 2000. I suspect this will reveal a situation much closer to what all longtime residents of the area have been experiencing – increasing gridlock.

I also ask that you require Stanford to provide more specific plans and funding for how it plans to maintain the NO NET NEW TRAFFIC standard. The EIR gives far too much latitude to Stanford to interpret what to do, and how much to do, to mitigate the effects of its expansion.

9

Thank you

Dick Brown

Woodside, CA 94062

Dick

5.2.3.17 Responses to Comments from Dick Brown

I-BrownD-1 This comment pertains to existing traffic conditions, not impacts of the proposed Project. Please see Master Response 1: Non-CEQA Comments, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting.

I-BrownD-2 Overall estimated vehicle trip generation and distribution for buildout of the proposed Project in 2035 is presented in the Draft EIR Section 5.15 Transportation and Traffic, pages 5.15-61 to 5.15-68. Impacts of the proposed Project are compared against 2018 baseline conditions in the Draft EIR. Please refer to Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting.

Please also refer to Master Response 13: Transportation and Traffic, Topic 6, No Net New Commute Trips Standard for a discussion of the effectiveness of the no net new commute trips standard under the 2000 GUP and Stanford's plan to continue achieving the standard under the 2018 GUP.

I-BrownD-3 The data presented in the Transit Capacity Analysis in Section 5.15.7 of the Draft EIR shows a temporary reduction of Stanford's total commuter population (all transportation modes) between 2015 and 2018; however, the train and other transit mode share, as a portion of the total commuters, did not decrease during this timeframe. The Caltrain mode share has hovered between 16 and 17 percent since 2013. Other transit mode share has hovered between 3 and 4 percent during the same timeframe. According to Caltrain's annual boardings report, Caltrain continues to see an increase in ridership and the University Avenue Station saw an increase in boardings of 1.6 percent last year.⁶ Nationally, transit mode share may have declined,⁷ but Stanford's TDM program, which provides free transit passes to affiliates, has not seen similar results.

The Transit Capacity Analysis presented in Draft EIR Section 5.15.7 (and subsequent addendum report presented in Appendix TBC-ADD in this Response to Comments Document) determined whether Caltrain capacity would be exceeded under the worst-case assumption that the decrease in single-occupant vehicle mode share needed to achieve the no net new commute trips standard results in a corresponding increase in Caltrain usage. The analysis is not intended to indicate that Stanford's TDM programs would not increase bicycling and other alternative transportation modes.

⁶ See http://www.caltrain.com/Assets/_Agendas+and+Minutes/JPB/2018/2018-09-06+PASSENGER+COUNT.pdf (see slides 8 and 11).

⁷ See https://www.washingtonpost.com/local/trafficandcommuting/falling-transit-ridership-poses-an-emergency-for-cities-experts-fear/2018/03/20/ffb67c28-2865-11e8-874b-d517e912f125_story.html?noredirect=on&utm_term=.7b762cc2a8f0.

The Draft EIR analyzes the impacts of development and growth under the proposed 2018 General Use Permit against 2018 baseline conditions. All Project traffic impacts, and contribution to cumulative traffic impacts are mitigated to the extent feasible in the Draft EIR.

Please refer to Master Response 13: Transportation and Traffic, Topic 6, No Net New Commute Trips Standard for a discussion of the effectiveness of the no net new commute trips standard and Stanford's plans to achieving the standard. The commenter is also referred to Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

I-BrownD-4 The forecasts for land uses outside the Project site were prepared using the VTA-C/CAG Travel Demand Forecasting model. Please refer to 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 University Medical Center (SUMC). Please see also Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution.

I-BrownD-5 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. Please note that 2018 is the environmental baseline against which Project impacts are judged. As a result, year 2000 is not a year relevant to the analysis in the Draft EIR.

Please see Draft EIR Appendix GHG Tables 3-6-13 through 3-6-17 for detailed quantification of GHG emissions from mobile sources related to the Project.

I-BrownD-6 The comment is not specific about the effect of tree removal on air quality. In relation to greenhouse gas emissions, trees can sequester carbon as they grow.

Most Stanford construction would be infill in already developed/graded areas. Although a small amount of carbon sequestration by trees on campus can occur, Stanford provides extensive replacement landscaping and tree planting. Removal of trees in the context of Stanford's overall emissions inventory would not result in a significant air quality or greenhouse gas effect.

Please note also, as discussed in Draft EIR, Section 5.2, Air Quality and 5.7 Greenhouse Gas Emissions, Mitigation Measures 5.3-8 and 5.3-11 identified in Section 5.3, Biological Resources requiring replacement of loss of protected trees or conservation of oak woodland would also serve the purpose of the absorption of some ambient criteria air pollutants as well as CO₂.

I-BrownD-7 Project and contribution to cumulative impacts to water demand are addressed in Draft EIR Impact 5.16-2 and 5.16-7. Impact 5.16-2 notes Stanford's total water demand upon buildout of the 2018 General Use Permit during normal water years

would be approximately 3.80 mgd, consisting of a potable water demand of 2.44 mgd, and a non-potable water demand of 1.35 mgd.

The Draft EIR shows that the guaranteed potable water allocation from the SFPUC would be sufficient to accommodate the potable water demand through buildout of the 2018 General Use Permit. Stanford would also maintain existing water rights for surface water diversion of non-potable water of up to 1.12 mgd. In addition, a sustainable groundwater supply of up to 1.52 mgd would be available to provide a supplemental source of non-potable water to serve the Project. Together, the local surface and groundwater sources would be sufficient to accommodate the non-potable water demand through buildout of the 2018 General Use Permit. Thus, while the proposed 2018 General Use Permit would generate an increased demand for water, this impact would be less than significant.

I-BrownD-8 The comment is noted, but does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please also see Draft EIR Chapter 7, Alternatives, which addressed alternatives to the proposed Project, including a Reduced Project Alternative.

I-BrownD-9 Please see response to comment I-BrownD-1 above.

Comment Letter I-Buchanan1

From: [Neilson Buchanan](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Thursday, February 1, 2018 9:19:47 AM

Please consider the following issues in your evaluation of Stanford expansion plans

1. The term, or period of approval, is too long. Nobody can accurately or crudely anticipate work, transit, academic and housing parameters during the years stated in the GUP. The best solution would be mutually reasonable terms to reopen approval every 8-10 years.

1

2. Stanford is making wild transportation assumptions, especially about improved Caltrain capacity to service to its students, faculty and employees. Development incentives have created a massive wave of housing/commercial development throughout the rail corridor. Caltrain service is almost guaranteed to disappoint the employers and employees assuming live/work benefits along the corridor. There is no data addressing the obvious surge in demand that will chase "boarding" as these projects move toward completion. Planning scenarios are not rocket science and are being willfully avoided by agency and city official whom we blindly trust.

2

3. Stanford is making questionable demographic assumptions, especially impact upon PAUSD. I fully support the comments submitted by the PAUSD Board

3

4. Let's keep perspective. Stanford planning process is better than any other private or public process in the entire Bay Area. Let's acknowledge a 90/10 rule. 90% of Stanford planning has proven to have real merit. 10% of its planning is obscure and out of public view. This 10% is not in the interest of citizens impacted by plans presented by Stanford. Stanford questionable claims and short-comings can be addressed by an open audit process involving outside experts to professionally fact-check performance goals in the GUP.

4

5. Trust; but verify.

Neilson Buchanan

[REDACTED]

Palo Alto, CA 94301

[REDACTED]

5.2.3.18 Responses to Comments from Neilson Buchanan

- I-Buchanan1-1 Please see Master Response 1: Non-CEQA Comments. The term of the General Use Permit may be considered by the County Board of Supervisors as part of consideration of the project as a whole.
- 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.
- I-Buchanan1-2 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.
- I-Buchanan1-3 Please see Master Response 9: Population and Housing Methodology and Calculations, and Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- I-Buchanan1-4 The County of Santa Clara is responsible for verifying that performance goals specified in the General Use Permit and compliance with the mitigation measures are achieved. The comment is not specific about what goals are not being met, and why outside auditing would be necessary.

Comment Letter I-Buchanan2

From: [Neilson Buchanan](#)
To: [Rader, David](#)
Cc: [Supervisor Simitian](#); [City Council](#); city.council@menlopark.org
Subject: Stanford GUP/EIR: Peer Review of TDM and other transportation programs
Date: Friday, February 2, 2018 11:38:06 PM

Please require Stanford to fund periodic [not less than every 3 years] peer review of its TDM assertions and programs. Peer review consultant should be jointly selected by SC County and Palo Alto City Council, if possible.

1

For example, See peer review programs provided by firms such as www.altrans.net

Peer Review

Commonly outlined in a site's EIR, a peer review process is required by the permitting authority (city, county, etc.) to verify whether or not EIR mandated goals have been achieved. The results of a peer review can mean the difference between construction being completed or completely shutting down. ALTRANS has undertaken peer reviews of site-wide TDM plans, as well as reviews of specific components and goals of TDM plans. ALTRANS' experience as a TDM organization lends the advantage of knowing what a successful TDM plan looks like on paper and in practice.

[Altrans - Alternative Transportation Solutions: Services](#)

2

Altrans - Alternative Transportation Solutions: Services

Altrans, Transportation Management Association specializes in traffic demand services for businesses, schools an...

Neilson Buchanan

[REDACTED]

Palo Alto, CA 94301

[REDACTED]

On Thursday, February 1, 2018, 9:18:52 AM PST, Neilson Buchanan <cnsbuchanan@yahoo.com> wrote:

Please consider the following issues in your evaluation of Stanford expansion plans

Comment Letter I-Buchanan2

1. The term, or period of approval, is too long. Nobody can accurately or crudely anticipate work, transit, academic and housing parameters during the years stated in the GUP. The best solution would be mutually reasonable terms to reopen approval every 8-10 years.

3

2. Stanford is making wild transportation assumptions, especially about improved Caltrain capacity to service to its students, faculty and employees. Development incentives have created a massive wave of housing/commercial development throughout the rail corridor. Caltrain service is almost guaranteed to disappoint the employers and employees assuming live/work benefits along the corridor. There is no data addressing the obvious surge in demand that will chase "boarding" as these projects move toward completion. Planning scenarios are not rocket science and are being willfully avoided by agency and city official whom we blindly trust.

4

3. Stanford is making questionable demographic assumptions, especially impact upon PAUSD. I fully support the comments submitted by the PAUSD Board

5

4. Let's keep perspective. Stanford planning process is better than any other private or public process in the entire Bay Area. Let's acknowledge a 90/10 rule. 90% of Stanford planning has proven to have real merit. 10% of its planning is obscure and out of public view. This 10% is not in the interest of citizens impacted by plans presented by Stanford. Stanford questionable claims and short-comings can be addressed by an open audit process involving outside experts to professionally fact-check performance goals in the GUP.

6

5. Trust; but verify.

Neilson Buchanan

[REDACTED]
Palo Alto, CA 94301

[REDACTED]

5.2.3.19 Responses to Comments from Neilson Buchanan

- I-Buchanan2-1 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on annual monitoring conducted by an independent transportation consultant, AECOM.
- I-Buchanan2-2 Please see Response to Comment I-Buchanan2-1, above.
- I-Buchanan2-3 Please see Response to Comment I-Buchanan1-1.
- I-Buchanan2-4 Please see Response to Comment I-Buchanan1-2.
- I-Buchanan2-5 Please see Response to Comment I-Buchanan1-3.
- I-Buchanan2-6 Please see Response to Comment I-Buchanan1-4.

Comment Letter I-Burke

From: [Kevin Burke](#)
To: [Rader, David](#)
Subject: comment on Stanford General Plan & EIR
Date: Thursday, January 18, 2018 1:40:21 PM

Palo Alto currently has a 3:1 jobs/housing imbalance, which means it needs to import commuters from other cities. The plan calls for 3,150 new housing units, which should help address this imbalance, and reduce total VMT.

Palo Alto and East Palo Alto currently have a high number of RV's and an increasing number of homeless residents. More housing units should help address spiking rent prices, which should help those people afford apartments instead of living on the street. Homelessness is not good for the environment.

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If anything I hope they could include even more housing units in the project.

Kevin

--

Kevin Burke


5.2.3.20 Responses to Comments from Kevin Burke

I-Burke-1 Please see Master Response 10: Affordable Housing. Please also note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-Castillo

From: [David Castillo](#)
To: [Rader, David](#)
Subject: Stanford providing more affordable housing for service workers
Date: Monday, January 29, 2018 6:42:53 PM

Dear David Rader, Mr.

Stanford Needs to provide affordable housing and transportation options for the service workers who make the University run and help improve housing and transportation for all Bay Area working families!

I 1

Sincerely,

David Castillo

[REDACTED]
San Jose, CA 95133

[REDACTED]

5.2.3.21 Responses to Comments from David Castillo

I-Castillo-1 Please see Master Response 10: Affordable Housing, and Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity. 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 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.

Comment Letter I-Cen

From: [Debra Cen](#)
To: [Rader, David](#)
Subject: Stanford expansion
Date: Friday, November 10, 2017 3:11:30 PM
Attachments: [page1image21392.png](#)
[page1image21552.png](#)
[page1image21712.png](#)
[page1image22632.png](#)
[page1image23880.png](#)
[page1image24352.png](#)
[page1image25584.png](#)
[page2image4584.png](#)
[page2image6616.png](#)
[page2image10728.png](#)
[page2image12568.png](#)
[page2image13952.png](#)
[page2image15736.png](#)
[page2image16208.png](#)
[page2image17256.png](#)
[page2image22112.png](#)
[page2image23992.png](#)
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[page2image29320.png](#)
[page2image32512.png](#)
[page2image41008.png](#)
[page3image432.png](#)
[page3image592.png](#)
[page3image752.png](#)
[page3image1904.png](#)
[page3image2328.png](#)

Dear Mr. Rader,

As a resident of Palo Alto, I am very concerned about Stanford expansion since it will add significant burden to the Palo Alto School District and increase more traffic. Therefore, I am oppose the expansion unless the following issues will be solved.

Issues:

- Stanford rental properties are tax exempt which means less property tax from new rental properties goes to PAUSD. Given that PAUSD is a basic aid district funded in large part by property taxes, whether Stanford chooses to lease or rent these new 550 units has long term financial impacts on the PAUSD budget.
- New housing is not close to schools. The proposed new housing is located on Quarry Rd in the west part of town near Stanford West Apartments. The projected total number of kids at these two sites is >400, enough to support a neighborhood school. Could Stanford consider supporting (through land and funding) establishment of a new neighborhood school? Or at a minimum how can Stanford help provide transportation for these children to help reduce traffic as they travel 2-3 miles to the nearest school?
- The board questions the School Generation Rate being used to calculate enrollment impact on schools and suggests it should be higher than the number Stanford estimates (275 students). Todd pointed out that PAUSD should expect surges to enrollment, not gradual growth, over years, across grades.
- Questioned traffic counts that only look at a very narrow window of time (peak commute hours between 7 am - 9 am and 4 pm - 6pmon work days)

Intersection Review: The table below (from Vol 2, p. 5.15-84) includes summaries of mitigation efforts for other Palo Alto intersections deemed significantly or adversely affected:

Intersection	Mitigation Suggestions
#2 I-280 NB Off-Ramp / Sand Hill Rd (Menlo Park)	Contribute fair share funding toward the addition of second northbound right-turn lane, as identified in the ConnectMenlo Final Environmental Impact Report.
#13 I-280 SB Off-Ramp / Page Mill Rd (Santa Clara County (SC CMP))	Contribute fair share funding toward the installation of a traffic signal.
#17 Junipero Serra Blvd – Foothill Expy / Page Mill Rd (Santa Clara County (SC CMP))	Contribute fair share funding toward installation of an overlap signal phase for northbound and southbound right-turning vehicles and widening of the southbound Junipero Serra Boulevard to two lanes between Stanford Avenue and Page Mill Road to align with the existing designated right-turn lane.

#19 Hanover St / Page Mill Rd – Oregon Expressway
(Santa Clara County (SC CMP))

Contribute fair share funding toward the installation of a second westbound left- turn lane, identified as an option in the Page Mill Expressway Corridor Study Report.

#20 El Camino Real / Page Mill Rd - Oregon Expressway (Santa Clara County (SC CMP))	Contribute fair share funding toward the reconfiguration of the east leg of the intersection to include one right-turn lane, two through lanes, two extended left-turn lanes, two receiving lanes, and no on-street parking; and to the extension of the double left-turn lanes, identified in the Page Mill Expressway Corridor Study Report.
#21 Middlefield Rd / Oregon Expy (Santa Clara County (SC CMP))	No feasible mitigation measure.
#29 Foothill Expy / Hillview Ave (Santa Clara County)	No feasible mitigation measure.
#30 Foothill Expy / Arastradero Rd	Contribute fair share funding toward a grade separation improvement project, as identified in the draft Santa Clara County

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cont.

Comment Letter I-Cen

(Santa Clara County (SC CMP))	Expressway Plan 2040. The grade separation assumes inclusion of a separated through-way for vehicles on Foothill Expressway.
#31 Foothill Expy / San Antonio Rd (Santa Clara County (SC CMP))	Contribute fair share funding toward the addition of a third southbound through lane on Foothill Expressway between San Antonio Road and El Monte Avenue as identified in the draft Santa Clara County Expressway Plan 2040.
#48 El Camino Real / Embarcadero Rd Palo Alto (SC CMP)	Contribute fair share funding toward the addition of a second northbound left-turn lane.
#56 Alma St / Hamilton Ave (Palo Alto)	Contribute fair share funding toward the reconfiguration of the westbound approach to have one left-turn lane and one right-turn lane, by removing a portion of the parking.
#58 Alma St / Charleston Rd (Palo Alto)	Contribute fair share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.
#63 Middlefield Rd / Lytton Ave (Palo Alto)	No feasible mitigation measure.

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cont.

#66 Middlefield Rd / Embarcadero Rd No feasible mitigation measure. (Palo Alto)

Best,

Hui (Debra) Cen

Palo Alto CA 94301

5.2.3.22 Responses to Comments from Debra Cen

- I-Cen-1 Please see individual responses that follow below.
- I-Cen-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.
- I-Cen-3 Please see Master Response 12: Public Schools, Topic 2: Additional School Site.
- I-Cen-4 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- I-Cen-5 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 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 generally, and in particular Topic 7: Average Daily Traffic and Peak-Hour Spreading.
- I-Cen-6 Please refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

Comment Letter I-Chiang

From: [C Chiang](#)
To: [Rader, David](#)
Subject: Re: 2018 Stanford GUP Draft EIR comments - Part 2
Date: Friday, February 2, 2018 5:00:18 PM

Stanford GUP Comments - Part 3

The significant and unavoidable transportation impacts in Chapter 6.2 can be mitigated if and only if Stanford erases the existing housing deficit completely for: Stanford faculty, Stanford staff, Stanford undergraduate and graduate students, and all affiliated workers, whether third-party, contracted, part-time, temporary, or contingent.

1

Approval of the 2018 GUP must require these mitigations.

Thank you.

C. Chiang
Palo Alto resident

From: C Chiang <carina2722@yahoo.com>
To: "David.Rader@pln.sccgov.org" <David.Rader@pln.sccgov.org>
Sent: Friday, February 2, 2018 4:48 PM
Subject: 2018 Stanford GUP Draft EIR comments - Part 2

Stanford GUP Comments - Part 2

1. Transportation - The 2018 Stanford GUP must not be approved unless the "Peak Commute Period" is redefined as the 4-hour period of time with the highest volume of traffic. All traffic mitigation measures (such as Measure 5.15-2, and others) must correspond to mitigations required for the expanded 4-hour "Peak Commute Period."
2. Transportation Mitigation - See 2018 Stanford GUP DEIR Volume 2, page 5.15-9: If implementation of any mitigation measure such as that for "Intersection #2" is contingent upon commitment and availability of funding, then the 2018 Stanford GUP must not be approved unless Stanford makes up the difference of any required funding is required for the mitigation measure to be implemented. If Caltrans actions to plan, approve, and implement such mitigation measures are hampered by a lack of funding, the Stanford 2018 GUP must not be allowed to implement any of its plans until Stanford provides such funding, regardless of whether it is commensurate with Stanford's impact. These requirements apply independently to each and every mitigation measure noted in DEIR Volume 2 Chapter 5 Transportation and Traffic.
3. Housing for Casual, Contingent, Temporary, Third-Party, Affiliate workers or employees: In 2018 Stanford employs over 9000 workers who are casual, contingent, temporary, third-party, or affiliates. By 2035, the DEIR Table 5-12-8

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Comment Letter I-Chiang

estimates over 11,000 workers in this category. In 2018, there is a substantial backlog of housing at or adjacent to the Stanford 2018 GUP boundary, causing rising housing costs and deteriorating commute conditions. Stanford must fully and directly fund housing at a 1:1 worker to housing unit ratio within the Stanford 2018 GUP boundary, to be built prior to implementation of any other growth requested in the 2018 GUP. Santa Clara County may consider allowing Stanford to count towards implementation such housing within other Stanford properties outside of the GUP boundary, provided Stanford fully funds school facilities, public safety services (e.g., Fire Department, EMS, Police services, water, and waste management). Any such housing that Stanford wishes to count towards this requirement but that is not located on Stanford property must pay full property taxes, parcel taxes, and other taxes or fees that would otherwise be levied on such properties.

4
cont.

Thank you.

C. Chiang
Palo Alto resident
[REDACTED]

From: C Chiang <carina2722@yahoo.com>
To: "David.Rader@pln.sccgov.org" <David.Rader@pln.sccgov.org>
Sent: Friday, February 2, 2018 3:59 PM
Subject: 2018 Stanford GUP Draft EIR comments - Part 1

Stanford GUP Comments - Part 1

1. **Housing for Staff:** The proposed 2018 Stanford General Use Permit (GUP) must provide affordable housing within the boundary of the proposed GUP to both diminish the existing housing backlog and prevent any future housing backlog for Stanford staff to achieve a ratio of 1.3 Stanford staff employees (e.g., maintenance worker, janitor) per affordable housing unit reserved for such staff employees within the GUP boundary. This may require increasing the residential density in existing campus residential areas.
2. **Housing for Students:** The proposed 2018 Stanford General Use Permit (GUP) must provide affordable housing within the boundary of the proposed GUP to both diminish the existing housing backlog and prevent any future housing backlog for Stanford students, so as to eliminate the housing demand placed by Stanford students on the surrounding communities.
3. **Housing for Faculty and Professional Staff:** The proposed 2018 Stanford General Use Permit (GUP) must provide affordable housing within the boundary of the proposed GUP to both diminish the existing housing backlog and prevent any future housing backlog for Stanford faculty and professional staff, so as to eliminate the housing demand placed by Stanford faculty and professional on the surrounding communities.

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Comment Letter I-Chiang

4. **Public Services:** the 2018 GUP must not be approved unless Stanford signs and funds an agreement for an established Fire Department (such as the PAFD) for the entire duration of the 2018 GUP period to provide EMS, fire protection and rescue services for the Project Site. The agreement must fully fund staffing, equipment, facilities, overhead, and future pension and retirement healthcare costs for the resources required to support Stanford. 8
5. **Palo Alto Unified School District:** the 2018 GUP must not be approved unless Stanford fully funds new school personnel, facilities and overhead costs to accommodate the increase in student population for the period of the 2018 GUP. 9
6. **Homeless Shelters:** The 2018 GUP must not be approved unless Stanford builds, funds, and staffs within the GUP boundary homeless shelters for a minimum of 2000 homeless people year-round, with sufficient facilities to accommodate a growth rate of the homeless population of at least 5% per year. 10
7. **Caltrain:** Stanford's Transportation Demand Management (TDM) program makes invalid assumptions about the capacity and frequency of Caltrain. Caltrain does not have stable funding, so assumptions about Caltrain's future infrastructure and future service can not be the basis for Stanford's transportation element of the 2018 GUP. The 2018 GUP must not be approved unless Stanford guarantees sufficient funding to Caltrain, to Palo Alto, and to Santa Clara County to ensure that Caltrain to increase capacity and frequency to support the Caltrain service area's needs and projected needs, taking into account non-Stanford growth that Caltrain must accommodate. Specifically, Stanford must fund at least 50% of the cost of additional train cars, 50% of the cost of lengthening of platforms, and 50% of the cost of planning and implementing replacement of at-grade crossings in Palo Alto. 11

Thank you.

C. Chiang
Palo Alto resident



5.2.3.23 Responses to Comments from C. Chiang

I-Chiang-1 In compliance with CEQA, the Draft EIR analyzes impacts of the proposed 2018 General Use Permit, including housing demand, associated with growth under the proposed Project conditions. The Project is not required to mitigate existing housing deficits. Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

Please note, however, that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two additional 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 their consideration of whether more housing should be constructed.

I-Chiang-2 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Chiang-3 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. With respect to implementation of the 2000 General Use Permit, this program has been effective in mitigating the potential transportation impacts of Stanford's facilities and population growth. The Draft EIR for the proposed 2018 General Use Permit 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.

Pursuant to CEQA Guidelines 15127.4 (4)(B), mitigation measures must be “roughly proportional” to the impacts of the project. Santa Clara County cannot require Stanford to pay more than its fair share of the cost of intersection improvements. Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation.

- I-Chiang-4 Please see Response to Comment I-Chiang1, above. Please also see Master Response 1: Non-CEQA Comments, and Master Response 10: Affordable Housing.
- 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 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.
- I-Chiang-5 Please see Response to Comment I-Chiang-1, above.
- I-Chiang-6 Please see Response to Comment I-Chiang-1, above.
- I-Chiang-7 Please see Response to Comment I-Chiang-1, above.
- I-Chiang-8 Please see Response to Comment A-PA-10.
- I-Chiang-9 Please see Master Response 12: Public Schools.
- I-Chiang-10 Social services, such as those for homeless shelters, and associated socioeconomic issues, are outside the scope of CEQA, and consequently, are not addressed in the EIR. See Master Response 1: Non-CEQA Comments.
- I-Chiang-11 Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.
- The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity. The Draft EIR explains on page 5.15-155 that the Governor's Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure.

However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for a discussion of capacity assumptions provided by the Caltrain Joint Powers Board.

Comment Letter I-ClarkK

From: [Katherine Clark](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Friday, February 2, 2018 4:37:54 PM

Dear David,

TRAFFIC in Palo Alto is OUT OF CONTROL. I have lived in my home on [REDACTED], between Hamilton and University Ave, in Crescent Park, Palo Alto, since 1984 (almost 34 years). In the last 2 years or so, traffic along University Avenue and my local street has become unbearable. We experience GRIDLOCK between 4:30 and 6:30 pm most weeknights. I am unable to get out of my driveway during the evening commute hours. In an emergency, fire and ambulance personnel would not be able to get down E. Crescent, W. Crescent and Center Drive. See WAZE screenshot taken a few months ago on a typical evening (the blue triangle is where my house is located). The traffic is hazardous for pedestrians and school children. Stanford's assertion that this HUGE development will not generate any NET NEW TRAFFIC is incredible, ludicrous and disingenuous. You are not going to convince all of the people who live in the East Bay, Livermore, Tracy and Modesto to get out of their cars and take public transit. There is no efficient public transportation available to them. Most of the traffic to and from the Dumbarton Bridge is funneled down University Avenue (which contributes to cars cutting through our local neighborhood streets). If, as I hear, Stanford is not counting Mall traffic and Medical Center/LCPH traffic in its traffic counts, that is a significant misrepresentation of the amount of traffic Stanford is generating.

According to its website, Stanford Medical Center (the Hospital) is a 613 bed hospital with nearly 1,600 faculty physicians and more than 1,100 residents and fellows. Assuming there are at least 5,000 nurses, med techs and other employees supporting those physicians, that is a huge amount of traffic already inundating our local Palo Alto streets.

According to its website, Lucille Packard Childrens Hospital, before its expansion was completed in December of 2017, was a 302-bed hospital, with 1,027 medical staff, 3,827 employees and 981 volunteers. LCPH just completed a 149 bed expansion which should increase its staff by 50%.

In addition to the Hospital and LPCH, Stanford has multiple clinics on its property (open during the daytime) that are contributing to traffic coming in and out of Palo Alto on a daily basis.

The Stanford Shopping Center is also a magnet for traffic along University Avenue (which contributes to traffic cutting through on our LOCAL neighborhood streets). To say that Stanford does not control the mall is disingenuous. Stanford owns and controls the property on which the mall sits. Stanford reaps the profits from the stores on a monthly basis. The parking lots are always full. Employees at the mall are directed to park in clinic lots to save spaces for customers.

I AM FED UP with the traffic gridlock in our neighborhood. It is just getting worse as time goes on.

We have to get traffic under control before any further developments are approved.

Thanks for listening,

Katherine Clark

1

5.2.3.24 Responses to Comments from Katherine Clark

I-ClarkK-1 This comment largely addresses existing traffic conditions, rather than impacts of the Project. These comments do not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Regarding existing traffic conditions, please see generally Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, and in particular 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 detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).

Comment Letter I-ClarkL

From: [Larry Clark](#)
To: [Rader, David](#)
Subject: General Use Plan
Date: Friday, February 2, 2018 4:56:17 PM

David:

I am a resident for the last 34 years here in Palo Alto. There are many nights when I am coming come from my job in San Jose that I cannot even get to my house! I sometimes have to park several blocks away. On occasion, I have to go on the wrong side of our street for a half block to get to our driveway only to have to wait 10 minutes for the car blocking our driveway to move with the traffic and allow my entrance. I have attended several public meetings on the Stanford plans to increase both building and people in and around their campus. Reading through their published materials, it is clear that they have not made provision for the ingress and egress of huge new population of workers and students which will be added because of their building plans. This will translate into unworkable and dangerous traffic congestion in our neighborhood adjacent to University Avenue.

1

The current congestion and all the problems we have will seem like the “good old days” compared to the traffic initiated by Stanford’s future plans. Palo Alto will no longer be a desirable place to live, to raise a family and will not be a safe place for residents like me and my family. I believe this plan is a threat to the future of Palo Alto.

[Larry Clark](#)

[REDACTED]

[REDACTED]

[Palo Alto, CA 94301](#)

5.2.3.25 Responses to Comments from Larry Clark

I-ClarkL-1 Regarding existing traffic conditions, please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

Comment Letter I-Cohen

From: [Susie Cohen](#)
To: [Rader, David](#)
Cc: plngbldg@smcgov.org; [Mike Callagy](#); city.council@menlopark.org; [Diana Shu](#); bwood@almanacnews.com; [Dave Price](#)
Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Thursday, November 30, 2017 11:10:48 PM

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of Stanford Weekend Acres, which is in Unincorporated Menlo Park, San Mateo County. I have lived here for over 30 years. I live on a cut de sac right off of Alpine Road. When I moved here, Alpine Road was a sleepy lane. I could ride my bicycle and barely have to look behind me as I made a left turn across the oncoming lane into my cup de sac. Alpine Road is now a main thoroughfare for cars and trucks headed for Stanford Campus and elsewhere. I now have to stop my bike and wait, sometimes 5 minutes, for a break in traffic to cross the street. The alternative is using a very inadequate bike path that goes under Junipero Serra and puts me on the correct side of Alpine. My husband, who has Parkinson's but still rides his bike daily to work at Stanford, was involved in an accident last April. A professional cyclist was on the path to avoid the lights and the traffic. Coming from the opposite direction, she swerved to avoid a pedestrian and plowed right into my husband. He required 15 stitches. When driving, I frequently have to wait 5 minutes or more to pull out of our frontage road to make a left turn, now, even at non rush-hour times. During rush hour I often simply turn right and go to Sand Hill Road to get to 280, even though it greatly increases my drive time.

1

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard, but at all hours of the day. Traffic could worsen throughout the day and no mitigation funds would be paid.

2

The No New Net Commute Trip standard disproportionately disadvantages residents of the unincorporated areas of Menlo Park (including West Menlo Park and Stanford Weekend Acres), as it is unlikely that trip reductions will actually be occurring within Unincorporated Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to Unincorporated Menlo Park to be ignored.

3

Additionally, funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from, or off of, our congested Corridor, this will not be possible.

4

Comment Letter I-Cohen

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

5

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods and geographic area.

6

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting "keep clear" on sections of Alpine Road and bike lanes on Santa Cruz Avenue is not significant enough and does little to alleviate traffic jams and to make the roadways safer. The "keep clear" signs don't help at all when there is a constant stream of traffic with a car length or two between cars, making it impossible to exit our frontage road. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection, adding middle turning lanes on Alpine and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the safety and the lives of those in our part of town.

7

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt directly by West Menlo Park residents.

8

Respectfully,

Susie Cohen & Barry Weingast

Menlo Park, CA 94025

5.2.3.26 Responses to Comments from Susie Cohen and Barry Weingast

I-Cohen-1	This comment is in regard to an existing condition. Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.
I-Cohen-2	Please see Response to Comment I-Appel-1.
I-Cohen-3	Please see Response to Comment I-Appel-2.
I-Cohen-4	Please see Response to Comment I-Appel-3.
I-Cohen-5	Please see Response to Comment I-Appel-4.
I-Cohen-6	Please see Response to Comment I-Appel-5.
I-Cohen-7	Please see Response to Comment I-Appel-6.
I-Cohen-8	Please see Response to Comment I-Appel-7.

Comment Letter I-Colton

From: [Jim Colton](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Wednesday, January 31, 2018 2:13:37 PM

Dear Mr. Rader,

I am a Stanford alumnus and a supporter. I am also a resident of Palo Alto. I am concerned that growth plans in the GUP will result in worse traffic congestion than we already have in Palo Alto. I know that Stanford has limited the traffic on campus by various means however some of these means have resulted in Stanford students and employees parking in Palo Alto then finding their way to the campus by other means. This is a good solution from Stanford's perspective but not from Palo Alto's perspective. I believe the growth outlined in the GUP will make this problem worse for Palo Alto. I think you should focus not just on solving Stanford's traffic problems but also work with Palo Alto to solve the traffic problems in Palo Alto.

1

Jim Colton

[REDACTED]

Palo Alto

5.2.3.27 Responses to Comments from Jim Colton

I-Colton-1 Due to lack of specificity in the 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, and identifies mitigation that reduces significant impacts to the extent feasible.

Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for information on how the Draft EIR addresses Stanford affiliates parking off-campus.

Comment Letter I-Conui

From: [Charmaine Conui](#)
To: [Rader, David](#)
Cc: plngbldg@smcgov.org; mcallagv@smcgov.org; city.council@menlopark.org; dshu@smcgov.org; bwood@almanacnews.com; [Dave Price](#)
Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Tuesday, November 14, 2017 12:21:29 PM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street, San Jose, CA 95110
Phone: [\(408\) 299-5779](tel:(408)299-5779)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

1

The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2

2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

3

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

4

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

5

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

6

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

7

Comment Letter I-Conui

Sincerely,

Charmaine Conui
SMC resident

5.2.3.28 Responses to Comments from Charmaine Conui

- I-Conui-1 Please see Response to Comment I-Appel-1.
- I-Conui-2 Please see Response to Comment I-Appel-2.
- I-Conui-3 Please see Response to Comment I-Appel-3.
- I-Conui-4 Please see Response to Comment I-Appel-4.
- I-Conui-5 Please see Response to Comment I-Appel-5.
- I-Conui-6 Please see Response to Comment I-Appel-6.
- I-Conui-7 Please see Response to Comment I-Appel-7.

Comment Letter I-Coogler

Full Name / Nombre Completo:

Tracy Coogler

Date / Fecha:

1/28/18

Email Address (optional) / Correo Electrónico (opcional):

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

Lets face it as a resident currently of E.P.A. I feel that the traffic is already grossly impacted. Many ppl are detouring through residential areas during morning transit. Cars are running stop signs, driving beyond the 25 mi an. hr speed limit. Children can no longer play outside for fear of being hit by cars. Driving to and from Palo Alto via University used to only take approx. 8 mins, now I'm in traffic for 30-40 mins just to get back home. The University exit has become just as bad as the Woodside exit. East Palo Alto, drastically needs funding to expand the overpass leading to Palo Alto and East Palo Alto. Our children who are bused to school out of our community arrive late to school. The environmental impact is concerning as well. Maybe business's should have a transportation tax to fund expansions. Thank you for listening.

Also we have a home based business, which is impacted the traffic. Our clients arrive late to their barbers shop appts.

5.2.3.29 Responses to Comments from Tracy Coogler

- I-Coogler-1 This comment is in regard to an existing condition, not related to the proposed Project. Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. See also Master Response 1: Non-CEQA Comments.

Comment Letter I-Cox

From: [Eric Cox](#)
To: [Rader, David](#)
Cc: plngbldg@smcgov.org; mcallagy@smcgov.org; city.council@menlopark.org; dshu@smcgov.org; bwood@almanacnews.com; [Dave Price](#)
Subject: Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Sunday, November 19, 2017 10:12:00 AM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
[70 West Hedding Street, San Jose, CA 95110](#)
Phone: [\(408\) 299-5779](tel:(408)299-5779)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

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The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2

2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

3

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

4

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

5

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

6

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though

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Comment Letter I-Cox

Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

Sincerely,
SMC resident

5.2.3.30 Responses to Comments from Eric Cox

- I-Cox-1 Please see Response to Comment I-Appel-1.
- I-Cox-2 Please see Response to Comment I-Appel-2.
- I-Cox-3 Please see Response to Comment I-Appel-3.
- I-Cox-4 Please see Response to Comment I-Appel-4.
- I-Cox-5 Please see Response to Comment I-Appel-5.
- I-Cox-6 Please see Response to Comment I-Appel-6.
- I-Cox-7 Please see Response to Comment I-Appel-7.

Comment Letter I-Crescibene

From: [Mike Crescibene](#)
To: [Rader, David](#)
Subject: Why can't Stanford help their lower pay staff members?
Date: Monday, January 29, 2018 6:51:09 PM

Dear David Rader, Mr.

I find it funny that Stanford only helps find housing or pay for partial housing to there hi paying Faculty members. (Who can afford to live here.) While lower pay staff members can't afford a house here in the Bay Area and can't get any help from Stanford for housing.

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Sincerely,

Mike Crescibene

San Jose, CA

5.2.3.31 Responses to Comments from Mike Crescibene

I-Crescibene-1 Please see Master Response 1: Non-CEQA Comments, and Master Response 10: Affordable Housing.

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 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.

Comment Letter I-Croft

From: [Rachel Croft](#)
To: [Rader, David](#)
Subject: Stanford GUP comment
Date: Saturday, December 2, 2017 7:59:06 PM

Dear David,

I have been recently been involved in discussions regarding grade separating Caltrain crossings in Palo Alto, and I understand we expect a doubling in trains and ridership on Caltrain over the next ~10 years. Much of this will be driven by Stanford, Stanford's growth, and Stanford's commitment to no new rides in peak hours. I will add there should be a commitment to no new rides during non-peak hours as well, as traffic in the area is congested all the time and for residents of Palo Alto, getting around the roads is increasingly painful, with deterioration in movement each year.

Stanford, with or without future expansion, should contribute significantly to the funding of grade separation of Caltrain crossings. Stanford's growth has fueled traffic congestion as well as overcrowding of trains necessitating addition of more trains. More trains will make traffic within Palo Alto and neighboring towns untenable without grade separation. Our community (Southgate in Palo Alto, just across El Camino from the football stadium) is actively discussing how additional growth, traffic, and grade separation options will affect the quality of our neighborhood - I can tell you that NONE of the options are good. We are seeking a grade separation option that causes minimal detriment to the neighborhood while allowing increased traffic to move. But options come at a price, and I believe strongly that Stanford, as a significant part of the problem, should contribute significantly to the solution.

Please feel free to reach me at [REDACTED].

Sincerely,
Rachel Croft
Palo Alto resident

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5.2.3.32 Responses to Comments from Rachel Croft

I-Croft-1 The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity. The Draft EIR explains on page 5.15-155 that the Governor’s Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for a discussion of capacity assumptions provided by the Caltrain Joint Powers Board.

Comment Letter I-DavisM

From: [Margo](#)
To: [Rader, David](#)
Subject: Please stop
Date: Thursday, February 1, 2018 7:14:15 AM

The outrageous level of expansion!!!!
Margo Davis

I 1

Sent from my iPhone

5.2.3.33 Responses to Comments from Margo Davis

I-DavisM-1 Please see Master Response 1: Non-CEQA Comments.

From: [Janet Davis](#)
To: [Rader, David](#); [Supervisor Simitian](#)
Subject: Stanford GUP
Date: Sunday, January 21, 2018 9:48:55 AM

STANFORD GUP = PIG IN A POKE

A General Use Permit Makes No Sense:

Every large development in Santa Clara and San Mateo counties has required DEIRs that are specific down to the landscaping. This would include the multi acre Stanford administrative campus being built in Redwood City and added to over the next 30 years! Why is the academic campus being given a *carte blanche* to build essentially *whatever* it wants, *wherever* it wants on campus for the next 17 or so years? **It is a veritable “Pig in a Poke.”**

1

WHAT is Built Has Differing Impacts:

There is a huge difference in environmental and societal impact between building e.g. an Art Gallery or a riding stable from building a high energy physics lab.

2

WHERE Something is Built Has Varying Impacts on Different Areas and Populations:

If an addition is built to Escondido, the impact is on Palo Alto. If development occurs on the other side of campus, the impact is on Menlo Park and San Mateo county. Under the existing GUP Stanford recently felt free to relocate a large building from one location to another where the impact would have been on Menlo Park and San Mateo County. It was only serendipitous that this was discovered in time for Menlo Park to object.

3

LOCATION has Impact on Infrastructure:

Over the last decade the massive Stanford developments in Menlo Park and abutting Menlo Park roads, have had a major negative impact on the quality of life for residents. For example: the area between the Sand Hill and Alpine intersections (designed by Stanford) needs major re-engineering. The roadway and the path beneath it are eroding and subsiding and, according to Menlo Park Public works would cost \$ millions to fix. This location is a potential death trap for cyclists.

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LOCATION has Impact on Services:

Whenever there is an emergency, MPFD Engine E4 frequently gets stuck at the Sand Hill and Alpine intersections, and the same is often true for other emergency responders.

6

FINANCIAL BURDEN on City and County Budgets:

Recently San Mateo County has tried to ameliorate some of the traffic dangers caused in good part by Stanford traffic. They have undertaken traffic and engineering studies. A task Force has been set up. The various law enforcement agencies have a combined enforcement unit – **just for the Sand Hill intersection area.** The Sheriff and CHP have expanded coverage of Alpine Road. San Mateo county Public works have painted KEEP CLEAR signs for residents along Alpine and the speed limit was reduced because of accidents. Solar speed trackers have been installed. Stanchions and “bots” have been installed recently to try and avoid commuters using the bike lanes as a pass lane. The sheriff has been accompanying kids to the school bus because of the dangers. The sheriff is having extra work because of the parking problems at the Stanford Dish back entrance along Alpine. There is a dire need for a multi million dollar realignment of the 280 on/off ramps needed because of the excess commuter traffic going to Stanford. Alpine Road cannot accommodate the truck traffic that Stanford

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generates both during construction and for servicing the various buildings.

FINANCIAL BURDEN ON INDIVIDUALS:

The accelerated development on campus and in areas adjacent to West Menlo Park has caused local property values to skyrocket (in addition to the impact from Facebook etc.) While this may be a boon to some, and it increases property tax revenues for the county, it means that apart from newcomers being priced out, longer time residents find that their mortgage interest and property tax payments only have very limited federal tax protection under the Trump revisions to the Tax Code. ***This makes the fact that Stanford pays no property taxes on its property that much more galling.***

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cont.

NO NEW NET COMMUTER TRIPS IS NONSENSE:

The very fact that the GUP contemplates thousands of new parking structures gives the lie to that assertion.

8

BOTTOM LINE:

The GUP should be denied ***in toto*** It is not known **what** will be built, **where** it will be built or **when** it will be built. Stanford should be treated just like any other large developer. Each and every project should go through the DEIR process. If the Trustees know what they plan to build on the Redwood City Campus for the next 30 years, they surely know what they plan on Campus since they have to launch appeals for endowments years prior to building.

9

5.2.3.34 Responses to Comments from Janet Davis

- I-DavisJ1-1 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.
- I-DavisJ1-2 Please note that socioeconomic effects are outside the scope of CEQA, and consequently are not addressed in this EIR. Please see Master Response 1: Non-CEQA Comments.
- I-DavisJ1-3 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.
- I-DavisJ1-4 The comment is not related to the proposed Project or the adequacy of the Draft EIR. Furthermore, quality of life issues are socioeconomic issues outside the scope of CEQA.
- Please also 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.
- I-DavisJ1-5 Please see Master Response 1: Non-CEQA Comments.
- I-DavisJ1-6 See Response to Comment I-Davis1-5, above. Please also see Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- I-DavisJ1-7 This comment is in regard to existing conditions, not related to the proposed Project. Please see Master Response 1: Non-CEQA Comments.
- I-DavisJ1-8 See Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions.
- I-DavisJ1-9 Please see Master Response 1: Non-CEQA Comments.

From: [Janet Davis](#)
To: [Rader, David](#)
Cc: [Don Horsley](#); [Michael Callagy](#); [Warren Slocum](#); [Christina Corpus](#); [Diana Shu](#); [Peter I. Ohtaki](#); [Kirsten Keith](#); [Raymond Mueller](#); [Catherine Carlton](#); [R. CLINE](#); [Jim Allen](#); [Supervisor Simitian](#)
Subject: MORE STANFORD GUP OBJECTIONS
Date: Saturday, January 13, 2018 6:40:18 PM

STANFORD UNIVERSITY GUP FURTHER OBJECTION TO TRAFFIC IMPACT ON ALPINE AND NEARBY ROADS

Recent Events:

Stanford Weekend Acres [SWA] is an old subdivision in San Mateo County, adjacent to Stanford University and squeezed between San Francisquito Creek and Alpine Road; home to several hundred people. These residents have been desperately trying to get some improvements with respect to the traffic congestion and dangers caused largely by Stanford commuters and suppliers. The same is true for the many people residing along Santa Cruz Ave, Alameda and side streets, both within San Mateo county jurisdiction and the City of Menlo Park. The data presented by the GUP as to traffic and *purported* public transportation is inaccurate and completely misrepresents the situation.

What the County and City Have Been Doing:

Santa Cruz/Alameda: A task force has been set up that meets to discuss potential mitigations. This involves considerable manpower by the agencies concerned as well as community effort. There is a combined Enforcement Unit for the Alameda/Santa Cruz Area which adds to the person power burden. The sheriff and the CHP installed portable radar trackers. The speed limit was reduced to 25 mph to reduce accidents, and this also involves extra person power to monitor. There have been several “near misses” with respect to children on the route to La Entrada. The senior residents of Menlo Commons have experienced multiple incidents of vehicles bound for Stanford using the middle access lane outside their building as an additional means of making a left turn to get to the Hospitals. To resolve this it is going to take engineering time and equipment to mitigate. The senior citizens are also experiencing dangers with respect to their crosswalk in front of the Menlo Commons because of all the traffic going to and from the hospitals. The only way this can be remedied is by a pedestrian activated crossing light and restriping, which will be expensive.

Alpine Road: Residents of SWA are virtual prisoners in their homes at various times of the day owing to Stanford commuters and suppliers. Traffic ignores the STOP signs for the school buses and drivers overtake in the oncoming lane in their haste to get to Stanford. Cars have been using the bike lane and the pedestrian path as a secondary vehicular lane, and parents are in fear of their lives when walking their kids to the school bus stop. There have been several accidents in the vicinity of Wildwood Lane and at least a few of those were caused by documented SU employees.

What the county has done recently to help with the traffic situation along Alpine:

There have been several county sponsored community meetings

The STOP signs were replaced with larger ones at I-280 and “Botts'-dots” added to reduce speed

Engineering studies were undertaken of Alpine traffic

The speed limit was reduced to 35 mph

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They have deployed extra sheriff patrols (assisted by the CHP) involving several vehicles and motor cycle units on overtime

Solar powered radar equipment has been installed

Solar powered speed checking devices have also been installed along the road

Extra white lines have been installed to delineate the bike and pedestrian lanes

“Bots” have been installed to emphasize bike lanes

Some plastic “Stanchions” have been installed (in lieu of steel barricades) to better mark the bike lanes in places. More are needed especially near Wildwood, and a better solution is needed to protect cars going in and out of the frontage road.

Traffic chaos recently occurred at Webb Ranch (a Stanford lessee) because of their Christmas Tree lot and the county Code Enforcement unit issued a violation because there was no permit, and traffic was making a U-turn across Alpine by the 280 off ramp.

The bizarre parking at the Dish back entrance at Piers Lane requires both traffic enforcement and sheriff monitoring because of the proliferation of thefts from those parked vehicles.

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cont.

FINANCIAL IMPACT OF THE ABOVE ON SAN MATEO COUNTY TAX PAYERS:

All of the above costs money that could be used by the county for other improvements.

Obviously Stanford is not the only generator of traffic, but in this area of San Mateo it is the dominant cause of problems for San Mateo county residents. Just the constant flow of large trucks must have a significant detrimental impact on Alpine road, which is just not suitable for the amount and type of traffic to and from Stanford facilities.

2

Attached are a few pictures of the engineering improvements that San Mateo County Public works has financed. Alpine Road cannot support any additional traffic to and from Stanford facilities, and given the ***complete dearth of public transportation*** in this area apart from school buses, the “No New Net Trips” mantra is totally meaningless with respect to San Mateo County roads. In addition to the above, there are huge problems within the City of Menlo Park’s jurisdiction along Alpine, Santa Cruz, Sand Hill, and Alameda: all of which are presently, and will in the future, cost that City a lot of money to remedy.

CONCLUSION:

The massive expansion planned by the GUP is unwarranted and cannot be supported by the *present* infrastructure of San Mateo County and the City of Menlo Park. Even with a more moderate rate of growth, some large infusions of cash and engineering talent are needed to make any quality of life sustainable for local residents.

3

Janet Davis

Jan. 13, 2018.













5.2.3.35 Responses to Comments from Janet Davis

I-DavisJ2-1 This comment is in regard to an existing condition, not related to the proposed Project. Please see Master Response 1: Non-CEQA Comments.

I-DavisJ2-2 Socioeconomic impacts are outside the scope of CEQA. Consequently; please see Master Response 1: Non-CEQA Comments. The comment also indicates Alpine Road is not suitable for Stanford-related truck traffic. However, please note that trucks are allowed by the applicable jurisdictions on Alpine Road between the campus and I-280 in San Mateo County.

Nevertheless, the Draft EIR, Section 5.15 Transportation and Traffic addresses all Project and contribution to traffic and transportation impacts associated with the construction and operation of the proposed Project on study area roadways, and mitigates all significant traffic impacts to the extent feasible. With respect to Alpine, Santa Cruz, Sand Hill, and Alameda de las Pulgas roads, the comment appears to be referring to existing conditions. However, the Draft EIR analyzed 15 intersections associated with these roadways, as illustrated in Figure 5.15-1 and presented in Table 5.15-1. Please see Response to Comment I-Appel-1 for a discussion of the Draft EIR impact evaluation of these roadways.

I-DavisJ2-3 Please see Response to Comment I-DavisJ2-1 and Response to Comment I-DavisJ2-2. Please see Master Response 1: Non-CEQA Comments.

From: [Janet Davis](#)
To: [Rader, David](#); [Supervisor Simitian](#)
Cc: [Warren Slocum](#); [Don Horsley](#); [Michael Callagy](#); [Kirsten Keith](#); [Peter I. Ohtaki](#); [Catherine Carlton](#); [R. CLINE](#); [Raymond Mueller](#)
Subject: Stanford GUP Objections - Fuzzy Math
Date: Friday, February 2, 2018 9:54:10 AM

SHUTTLE CREDIT FUZZY MATH ?

“If we add more people, even at the current drive-alone rate, that's going to increase the number of trips coming to campus. That's just doing the math.” Brian Shaw, Stanford’s Transportation director, Sept. 24, 2014.

(<https://news.stanford.edu/news/2014/september/shay-parking-director-092314.html>)

Yesterday, February 1, 2018, I talked to two separate shuttle drivers, and asked whether they log the places they pick up and drop off passengers, or whether they log the **total number** of passengers. Both replied **NO** to each question. If this is true, then there is no reliable way to assess any “credits.”

The basic premise of “No New Net Trips” is also belied by the above quote from Stanford’s own Transportation Director, Brian Shaw. In the above quote he also itemizes all the new parking structures under construction even as of 2014.

Even if the Marguerite credit system were viable, it makes no sense. A credit for two passengers on El Camino does nothing to alleviate the torrent of new commuters on Alpine and Sand Hill Roads.

The GUP is unduly vague in what is planned for what location, yet at the same time the University has just issued white papers on its long term planning goals. That being so, where is the need for a “pig in a poke” GUP that specifies nothing for the relatively short period of 17 years! See:

https://www.stanforddaily.com/2018/02/02/stanford-releases-white-papers-synthesizing-long-range-planning-submissions/?utm_source=rss&utm_medium=rss&utm_source=The+Stanford+Daily+e-mail+digest&utm_source=The+Stanford+Daily+e-mail+digest&utm_campaign=c6db1eb98a-The+Stanford+Daily+e-mail+digest&utm_medium=email&utm_term=0_c6bb9454a7-c6db1eb98a-102115017

To approve a General Use Plan with no specifics is beyond foolhardy and negatively impacts the quality of life for surrounding communities, and makes urban planning by those communities a crapshoot.

BOTTOM LINE: Deny the GUP in its entirety and require full EIRs for each specific project, so that a valid assessment can be made of overall impacts on the surrounding communities.

Janet Davis

February 2, 2018

5.2.3.36 Responses to Comments from Janet Davis

I-DavisJ3-1 County verification that Stanford is meeting the No Net New Commute Trip Standard is not dependent upon the collection of data as to the number of Marguerite riders who take shuttles into and within the campus because those riders are not creating external impacts by driving vehicles into and out of the campus. A rider who enters the campus cordon on a Marguerite shuttle does not drive a vehicle onto the campus, which would then not be counted during periods when County consultants are conducting cordon counts.

By contrast, the County does receive data regarding the number of riders who take a Marguerite shuttle who do not enter the campus. This is because a Marguerite shuttle rider who never enters the campus (never crosses the cordon) may qualify as a trip reduction credit. These credits recognize that Marguerite ridership that occurs outside the cordon reduces vehicle trips outside the cordon in the impact area. To determine this credit, during the peak hours, Marguerite riders are counted on all routes and stops that are outside the cordon area, but that are inside the impact area. Boarding data is provided to Stanford by the shuttle operator. The data is submitted to the County and its consultants when Stanford requests credits toward the cordon counts in a given year.

A credit for passengers who take a Marguerite shuttle from the Caltrain station corresponds to a benefit from removing vehicles from all roadways surrounding the campus, including Alpine and Sand Hill Roads. Many trip reduction services, programs and projects are regional in nature (i.e., Caltrain and express bus services) and affect the entire traffic impact area, thus providing area-wide benefit. For example, a commuter from San Francisco who takes Caltrain and then the Marguerite shuttle to Stanford Healthcare facilities, otherwise would likely have approached the medical center from Sand Hill or Alpine roads if the commuter was in a vehicle.

Finally, the quote from Brian Shaw, Executive Director of the Department of Parking and Transportation Services at Stanford University, mentions an increase in the number of trips coming to campus, but those trips are not necessarily vehicular trips, as Mr. Shaw's department is focused on moving vehicle trips to alternative modes of transportation such as transit and bicycles. The parking structures in the article cited by the commenter are related to removing surface lots and providing space for infill development. Stanford has added to and subtracted from its parking supply during this time period as needed without any increase in vehicle trips in the peak hours. As of Fall 2018, there are 1,641 fewer parking spaces on the campus than existed in 2000 because two major parking areas are under construction. Once the Center for Academic Medicine and the Escondido Village Graduate Residents are completed, there will be nearly 1,000 spaces more than in 2000.⁸ Much of this increase can be attributed to provision

⁸ See Appendix TRF-MISC in this Response to Comments Document.

of parking for student housing, which does not directly translate into an increase in vehicle trips to and from the campus during peak hours.

Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, which addresses the concern that trip credits might reduce trips in some travel corridors, while not reducing trips in others, and Topic 13: Parking Supply and Restrictions.

I-DavisJ3-2 Please refer to 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.

I-DavisJ3-3 Please refer to 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.

Please note also that quality of life issues are socioeconomic issues outside the scope of CEQA. Please see Master Response 1: Non-CEQA Comments.

I-DavisJ3-4 Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

From: [Janet Davis](#)
To: [Rader, David](#)
Subject: OPPOSITION TO STANFORD'S 2018 GUP
Date: Saturday, November 18, 2017 1:04:48 PM

MY PERSONAL EXPERIENCE RELATED TO STANFORD DEVELOPMENTS RELATIVE TO ITS PROPOSED 2018 GUP

BASIC PROBLEMS WITH THE GUP:

It only deals with the specifically and *narrowly defined core academic boundary*, totally ignoring the *cumulative impact on the entire surrounding area*, of Stanford build out and proposed projects at, for example:

- The massive Hospitals rebuilding,
- Ronald McDonald expanded housing,
- The Shopping Center additions,
- The Page Mill industrial park rebuilding,
- The developments along El Camino Real in Menlo Park,
- The athletic facilities that attract thousands of fans,
- The Golf Course and its catering operation,
- 2131 Sand Hill and other leasehold facilities along Sand Hill (including the Rosewood Hotel),
- The Quarry Road project,
- The huge developments in the Arastradero/Coyote Hills area,
- The various satellite functions such as the Eye Center on Embarcadero East, the Imaging Center on Sherman Ave,
- The huge Redwood City Campus, or
- The expansion at SLAC (including the Guest House).

All but two of the above are either in San Mateo county and/or require I-280 or San Mateo Road access.

This *GUP also focuses almost exclusively on Santa Clara County impact*, ignoring the consequences in Menlo Park, Ladera, Portola Valley, Atherton, and Redwood City: all in San Mateo County, which is going to bear the brunt of the consequences from the proposed development.

This defeats the entire purpose of CEQA under Section 15064.3 which seeks to examine the *cumulative effect* of a project and its impact on the *surrounding communities*. The GUP is also flawed in that it uses the discredited **"No New Net Trips"** figures that do not deal with issues area by area. For example, a commute credit may be assessed in one area, leading to added traffic in another. The fact that under the GUP *Stanford is proposing to build 2000 parking spots in the core academic boundary belies the university's assertion that there will be no new net trips!*. Mr. Girard of the Santa Clara Planning Dept. at the Menlo Park meeting on November 15 attempted to explain this away by saying that the parking spaces might be used for storage. This is just not credible. To plan for 2,275,000 extra sq. ft. of facilities and at least 10,577 additional workers, adding that there will be more vendors, deliveries, conferences and tours only adds to the lack of credibility of the assertion. An early summary of the GUP stated that the core campus currently has around 500,000 visitors annually.

The traffic data is also tabulated via the **VMT method [Vehicle Miles traveled] (rather than the locally applied LOS method)** to avoid the patently obvious fact that traffic in the vicinity of the university is over-capacity. This is largely due to the university's constant expansion, and the fact that the *housing/jobs imbalance* (also accentuated by the university's constant

construction) is causing many of its lower income employees and other local workers who cannot afford local housing prices, to commute long distances, adding to the traffic woes.

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Santa Clara County is not going to get much in the way of property taxes from all this development and San Mateo County is going to bear the brunt of much of the resulting impact.

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BASIS FOR MY OBSERVATIONS:

I have lived at 2455 Alpine, Menlo Park, for 50+ years (before the 280 freeway was built, before Sand Hill was widened, and before the right turn lane was added to the Alpine/Junipero Serra intersection). I drive back and forth along Santa Cruz and Alameda several times a day and often drive down Junipero Serra to Los Altos, as well as down Alpine to Ladera and Portola Valley. I also frequently drive up and down Sand Hill Road and many of the streets that cross Santa Cruz and Alameda, and along Avy and Monte Rosa to Sand Hill. Therefore I have **extensive personal knowledge**, over many years, of the traffic conditions that have existed, and presently exist in the entire area around West Menlo Park, into Redwood City and south to Los Altos. I am also part of a County of San Mateo Task Force that is addressing the safety aspects of all modes of traffic (cars/bikes/pedestrian/public transportation) in the vicinity of the Sand Hill/Santa Cruz intersection. Considerable research has been done by local residents and the county in this area and it can be viewed at: <https://publicworks.smcgov.org/santa-cruz-avenue-corridor-study>.

Particular attention should be paid to the **resident-drafted** documents at **Univ.park.org** which list the problems and potential mitigations for the drastically increased traffic being experienced in the area of the Sand Hill intersection. That site contains several photographs and documents 21 accidents in the last year. There have been multiple meetings with County and City officials, the Sheriff, MPPD, CHP and the Fire District in the search for solutions.

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However, the basic problem is that **all** the roads surrounding the Stanford Campus are overloaded to beyond saturation point and the fact that there is virtually no public transportation apart from school day bus service for the local high school. Also, I have followed traffic at various times of day and know that the vast majority of it goes to, or comes from, Stanford facilities.

WHAT HAS HAPPENED TO TRAFFIC, PARTICULARLY SINCE 2000:

Alpine Road background:

Alpine Road is a narrow, two lane road with several blind curves that has speed limit of 35 mph. **Back in 2000** it was estimated that it carried over **20,000 vehicles/day**. This number has increased very significantly. It is bounded on the west side by very steep hills subject to erosion. On the east side, below the level of the road is the Stanford Weekend subdivision with around 150 homes bordering the San Francisquito Creek, which frequently floods. Also, late in the evening and at night, deer frequently cross Alpine from Stanford lands on the east to SLAC on the west side. On the West side (owned by Stanford) there are grazing fields, an equine hospital and a horse barn. These facilities frequently have slow moving agricultural vehicles such as tractors, or trailers with 12-16 horses coming and going. There are no traffic lights.

On the East side there are several *cul de sacs* as well as individual driveways exiting directly onto Alpine. Currently there is substantial remedial bank construction to fix drastic subsidence of the banks endangering major gas and water lines. In the past there have been several accidents involving vehicles going over the creek embankment. There is no drainage

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system in this area and water flows off the westerly hills towards the creek making winter driving especially hazardous during inclement weather. Other factors include the back entrance to the Stanford dish which attracts numerous vehicles that park (legally and illegally) on both sides of the road, the back entrance to the Hewlett Foundation and the back entrance to SLAC: all of which cause significant safety problems.

Law enforcement along Alpine is virtually nonexistent because it is the responsibility of the understaffed CHP. Because of this lack of enforcement and nonexistence of traffic lights, commercial vehicles especially, opt for Alpine over Sand Hill, even sometimes when their destination is Sand Hill Road. During Stanford's recent hospital construction neighbors counted double semi dump trucks at the rate of one every 17 seconds for a period of time.

There are ***no traffic lights that would allow vehicles to platoon*** along Alpine, affording residents an opportunity egress/ingress to and from their property. The traffic into Piers and Ansel Lanes (Stanford lands) is sufficient to fit the State's warrant requirements for a light, but absent costly reconfiguration of the 280 on/off ramps, this would be counterproductive for throughput.

When Alpine is not gridlocked, it is a speedway, despite law enforcement's best efforts. San Mateo County has recently spent money installing KEEP CLEAR signs and radar speed signs to try and control the traffic, which has had a less than stellar result.

Changes in Traffic Patterns Near Campus and Results Thereof:

My observation has been that in the last 10-17 years, the volume of vehicles has probably doubled between 280 and Junipero Serra, and that there has been a significant increase in construction and service vehicles such as flatbeds, double semi dump trucks, concrete trucks, delivery vans, etc., much of which comes and goes to University sites.

Morning Problems on Alpine/Sand Hill/Santa Cruz Heading Towards Stanford :

(I know that the majority of vehicles in the morning head towards Campus Drive West, the Golf Course, or the Hospital, because I have frequently followed them and, with respect to construction vehicles, have even taken some of their license no's and forwarded them to Stanford.) Alpine never used to be a truck route and was not so indicated on Stanford's website. Around the time of the Sand Hill widening it was so designated, despite the fact that the entire length of Junipero Serra (even between Alpine and Campus Drive West) is signed, banning all trucks over 7 tons.

In the morning the vehicular onslaught on Alpine now starts around 5 a.m. By around 7:15 a.m. cars are bumper to bumper backed up along the freeway from both the north and south, and this gridlock continues all the way down Alpine, thence down Junipero Serra to Campus Drive West and beyond, and down Sand Hill to the Hospital. Motorcyclists, trying to avoid the back-up, frequently use the bike lane. Some drivers even try to overtake in the bike lane and, sometimes, even on the path.

The two far right lanes at the Alpine/Junipero Serra intersection stretch back the full length of the turn lane, and traffic, which is bumper to bumper, goes all the way back to 280. I have great difficulty getting out of my driveway to turn right until around 10:30 a.m. A left turn is almost impossible, requiring me to drive to Sand Hill to make a U-turn. Because of this back up, drivers on Alpine wishing to go to Santa Cruz or Alameda opt for the left hand lane to get through the Alpine light (otherwise one has to wait up to 6 iterations to go through this light).

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Once in the ***area between the Alpine and the Sand Hill lights***, the entire right hand lane and bike lane is frequently blocked by vehicles trying to get to the hospital. This has a number of consequences:

- The bike lane is totally blocked, so many cyclists from Alpine heading towards Santa Cruz Ave, race down the trail under the cantilevered section making it too dangerous for pedestrians and less proficient cyclists. There have been several accidents here. It has become too dangerous for Stanford Weekend Acres (SWA) children to walk to La Entrada school, so their parents drive them, creating more traffic.
- Other cyclists heading towards Santa Cruz, Alameda or upper Sand Hill weave in and out of the lanes of traffic jockeying for position, resulting in many near misses
- Cars waiting at the Sand Hill intersection to make a right turn towards the hospital, block cyclists coming from upper Sand Hill road because they are parked over the entrance to the trail going along the golf course **and** the actual bike lane on the roadway
- Vehicles coming north from Junipero Serra hoping to cross the two lanes of traffic between the two intersections and make a left turn towards SLAC, are totally blocked by the queueing vehicles in the right hand lane, and traffic backs up along Junipero Serra
- When the light is RED at Sand Hill, those drivers wanting to make a right turn from the area between the intersections, towards the hospital, rarely stop which has resulted in many near misses. (The same is true with respect to the red light at the opposite corner of Santa Cruz and Sand Hill where drivers going from Santa Cruz to upper Sand Hill, breeze through the red light)
- Drivers aiming for Downtown Menlo Park after crossing Sand Hill then have to change lanes within the one block between Sand Hill and the juncture of Santa Cruz and Alameda. I have seen as many as 7 lane changes in that one block. This is highly dangerous (especially for cyclists because there is no bike lane) since the east side of that block of Santa Cruz is lined with multiple driveways, many of which are well below street level. In the past year there have been 21 accidents in the immediate vicinity
- Since there are no Stanford signs indicating the route to the hospitals, many drivers are confused and end up in the left hand lanes instead of the right hand lanes. Many of them subsequently veer across all the lanes to make the right turn lane, creating yet more hazards.
- The vehicle lane changes in the first block of Santa Cruz after the Sand Hill intersection, make it virtually impossible for homeowners along that block to exit or enter their driveways.
- Another problem with the jammed Sand Hill intersection is that many commuters try to avoid it by cutting through Palo Alto Way which is a very narrow residential street.

In the early morning, because of the increase in traffic, it sometimes takes me 45-50 mins. to get to the Menlo Park Burgess City Center instead of the 10 mins it should take me. If I try to come home before 10:30 a.m., I am stuck in the middle of Alpine with vehicles careening around me to the right, until some kindly soul allows me to make a left turn into my driveway. This is the same for every other SWA resident along Alpine.

Vehicles Heading South towards Campus Drive West from Sand Hill or from Alameda:

In the morning there is heavy traffic. There is a problem with the merge lane immediately south of the Sand Hill/Santa Cruz intersection in that vehicles try to overtake on the inside because of congestion. This occurs mornings and evenings.

Morning Problems with Alameda

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Because of the access problems with respect to 280, Alameda becomes jammed with traffic, much of which is trying to get to Stanford. This creates a major problem for example, for those 174 residents of Menlo Commons trying to exit or enter their condominium development or for other University Park residents to access Alameda/Santa Cruz. Traffic is often so heavy that some drivers intent on getting to the hospital use the middle turn lane to overtake traffic on the inside to get ahead in the line to turn left to go to the hospital. This endangers residents of Menlo Commons trying to make a left turn to get to downtown Menlo Park.

Evening Problems with Alameda

Because it is so difficult to access I-280, traffic (mostly from Stanford facilities) jams Alameda from Sand Hill, through Atherton, to Woodside Road in Redwood City.

Evening Problems on Alpine/Santa Cruz/Sand Hill

“Rush Hour” now starts around 3:15 p.m. which seems to coincide with some kind of shift change at the hospital since vehicles start pouring out of Pasteur Drive and head towards Sand Hill or Alpine. Sand Hill becomes a virtual parking lot from Pasteur to 280. Alpine Road is also jammed from the Sand Hill/Alpine intersections to 280. This makes it almost impossible for SWA residents to make a **left** turn onto Alpine.

Another problem involves vehicles exiting the back entrance of the Hewlett Foundation and making a highly perilous and illegal left U-turn to get to Junipero Serra. Some of these vehicles have the Stanford logo on their side.

Alameda is the location of a MPFD station. They are the first responders to any emergency in the West MP area, SWA and for accidents on 280. The fire engine and ambulances are often blocked by the traffic jamming the intersections and the roadways from Alameda to 280. Sometimes they have to use the residential Avy, Monte Rosa and Sharon Park roads to get better access to I-280.

Morning Problems on Junipero Serra

Traffic is usually solidly blocked from Alpine to Campus Drive West and heavy all the way to Page Mill.

Evening Problems on Junipero Serra

Traffic heading south to the Page Mill 280 entrance is very heavy from Campus Drive West and is virtually a parking lot from Stanford Ave to Page Mill. Traffic heading north to the Alpine 280 entrance or towards Alameda, is also frequently a virtual parking lot from Campus Drive East.

Problems on Avy/Monte Rosa

This has become a cut through route to and from 280 for traffic trying to avoid some of the back-up problems. This traffic is often exceptionally fast and is a danger to local residents and to students at Philipps Brooks School.

Traffic on ECR in San Mateo County

In the morning it is bumper to bumper from Woodside road to the university. In the evening, the reverse is true.

Cyclist/Pedestrian Problems Coming or going to Stanford

There is no pedestrian crossing on Junipero Serra or at the Alpine intersection. This means

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that people walking to and from Campus Drive West have no safe way to cross Junipero Serra to get to SWA because of traffic. If they want to go from Junipero Serra to Menlo Park they have to walk in the bike lane over the creek, which is often blocked by cars. If cyclist commuters want to bike from Campus Drive West to SWA homes there is no safe way to cross Alpine Road because of the increased traffic causing many high speed bikers to use the footpath along SWA which is extremely perilous for residents.

The brick surface surrounding the Buck Estate is blocked by metal rails for pedestrian travel, yet this is used by people coming out of the Hewlett Foundation trying to walk around the corner to Safeway on Sand Hill road. If there were a pedestrian crossing at the Alpine/Junipero Serra intersection this would mean that this path could be used by local residents to avoid the dangers of the eroding and non ADA compliant “trail” under the cantilevered section between the two intersections.

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HOUSING ISSUES IN THE VICINITY OF THE UNIVERSITY:

Housing affordability is an issue throughout the State. However, in the vicinity of the university this is particularly evident. There are many visiting scholars requiring short term rentals and postgraduates seeking leased accommodations. Demand has driven up rents, increased the number of “doubled up” lessees, and created a burgeoning AirBnB industry which will only add to traffic woes in the future. It has altered the character of SWA from an almost exclusively owner occupied residential neighborhood to a more profitable rental market.

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HOW THE UNIVERSITY’S GROWTH AFFECTS MY & OTHER RESIDENTS’ QUALITY OF LIFE

I appreciate the great medical facilities and the increased diversity in my neighborhood, but it has come at the expense of some aspects of the quality of life, especially related to traffic issues, a summary of which entails:

- Inability to get in and out of my driveway because of traffic, most of which is Stanford based
- Danger on the road because of traffic congestion and constant fear of an accident
- The neighborhood path in SWA has become too dangerous to use because of cars veering onto it, and because cyclists use it in both directions
- The “trail” put in by Stanford that runs under the cantilevered section of Junipero Serra/Santa Cruz is non ADA compliant, and that together with the excessive use by high speed cyclists has made it too dangerous for safe pedestrian travel.
- Closing down of Webb Ranch Fruit Stand because of dangerous traffic means that fresh produce is no longer so easily available
- Removal of bus stop from Alpine because it was too dangerous to use because of added traffic
- Failure of traffic to stop for school bus at Stowe and Bishop which means that commuters cross the yellow line into oncoming traffic to get to their destination. This also happens on Garbage days, which is extremely perilous for local residents and commuters. When cars **do** stop for these vehicles they back up and block the KEEP CLEAR zones making it impossible to get into or out of my driveway
- Necessity of traveling out of my way to make a safe U-turn at Sand Hill in order to drive to Portola Valley
- Enormous amount of noise from the increased traffic most of which is destined for Stanford
- Oily storm water residue from excessive number of vehicles on Alpine, most going to or

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from Stanford

- Heavy odor of diesel from the many construction trucks going to and from Stanford and other locations
- Increase in number of student renters who often are very noisy compared to average families
- Increase in amount of time it takes to get anywhere because of traffic in West Menlo Park
- Increase in number of accidents and the associated noise from sirens
- Massive increase in construction trucks, many going to Stanford
- Difficulty in negotiating route to the hospital, especially to the ER when it has become necessary because of lack of signs and traffic back ups
- Increase in tour buses using Alpine to get to and from campus
- Increase in vehicles on Alpine carrying fans to athletic events, some of whom are careless drivers
- Being verbally abused or flipped off by commuters angry that I am trying to enter or exit my driveway
- Increase in noise from horns, and angry commuter/cyclist interactions on Alpine
- Observed increase in number of killed wildlife and domestic pets along Alpine because of increased traffic
- The enormous amount of time and effort it has taken me and other neighbors to work with the county (and Stanford) to try and get some traffic mitigations.

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POSSIBLE MITIGATIONS:

Traffic

Physical mitigations to deal with traffic have limited potential. What is needed is better mass transit options from 280 to Campus. This could take the form of:

- a park and ride lot near 280
- Commuter buses from San Jose via I-280
- Shuttle extensions from Ladera, Portola Valley and Woodside
- Better coordination with Samtrans to provide effective service in the San Mateo county area

Given the huge increase in traffic to and from campus and the hospitals from I-280, eventually there will have to be a Stanford-dedicated tunnel from 280 to Campus

There are some “low hanging fruit” safety mitigations that could be undertaken. Many are listed in the UnivPark.org document. Below are some other suggestions that would make travel safer for all:

- Crosswalks on Junipero Serra and Alpine
- Removal of the bulb out between the Alpine and Sand Hill intersections that prevents more than one vehicle at a time getting from Junipero Serra to the left turn lane at Sand Hill
- Addressing the ADA compliance problems of the “trail” from Alpine to Sand Hill and install speed limit signs for cyclists on that trail
- Engineering erosion and storm water solutions for the trail under the cantilevered section of the trail, making it safer for pedestrians and cyclists. Also investigate the possibility of engineering a way for pedestrians coming from Junipero Serra to Sand Hill get down the incline at the start of the bike lane, so that they do not have to walk in the bike lane and get hit by cars.
- Work with San Mateo County and Caltrans to better engineer the 280 on/off ramps to avoid the mass confusion at rush hours

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- Provide pullover setbacks and shelters for the school bus stops at Stowe and Bishop so that the parents are not fearful for their safety
- Put some barricades along Alpine by Wildwood Lane to protect pedestrians from the constant problem of cars, trucks, and motorbikes from driving in the bike lane and on the path
- Put some barrier at the Hewlett Foundation back gate to prevent cars making U-turns there
- Install legible illuminated signs indicating routes to hospitals, especially the ER.
- Work with Samtrans to get better public transit in West Menlo Park. There is a special need to better organize ways for Menlo Atherton H.S. kids to get home instead of the bus dropping them off at Safeway so that their parents have to drive over to get them.
- Investigate feasibility of a park and ride near I-280
- Provide shuttle service in W. Menlo Park, Ladera and Portola Valley where many Stanford community live, and where there are numerous Stanford associated facilities
- Investigate the possibility of commute vehicles along the 280 corridor
- Eliminate double semi dump trucks from Alpine Road since these vehicles cannot stop easily in a short distance and there are several blind corners. Also, the driver has little control over the back semi and it strays into the bike lane. These vehicles also have trouble negotiating the traffic light at the Alpine intersection and the back trailer runs over the brick base to the light, narrowly missing cars waiting in the left hand lane. They also are too big to safely negotiate the turn from Alpine to Junipero Serra without swaying into the bike lane.
- Have some kind of monitoring/permitting system for construction trucks. Many of them speed because apparently they get paid by the number of loads.
- Install some arrows at the junction of Sand Hill where the lane turns under the Buck Estate. When traffic is heavy there is much lane jockeying here and cars do not realize that the merge lane is not a separate traffic lane. This causes them to invade the bike lane which is hazardous for cyclists
- Enlarge the merge lane at the beginning of Alpine Road by the Buck Estate since this is a huge hazard for cars and bikes at rush hour
- Enlarge the bike lane heading towards Portola Valley on the West side of Alpine within the jurisdiction of Menlo Park since it is unduly narrow and at one point there is a slotted lane that takes up most of the bike lane. Also provide better maintenance for trimming foliage that hits taller cyclists.
- Restrict access/parking to the back entrance to the Dish on Alpine road since it causes major traffic safety problems especially since it is right next to the 280 off ramp.
- Engineer some way to deal with the extreme dangers to cyclists in between the Sand Hill and Alpine intersections. Cyclists coming from Santa Cruz or upper Sand Hill trying to get to Junipero Serra swerve in between cars in an ultrahazardous fashion. A major danger exists because the middle lane at the Alpine traffic light allows cars to go straight or make a left hand turn. I have seen numerous near fatalities where the cyclist is turning left, but the car behind him accelerates forward. **The middle lane should ONLY BE LEFT TURN.** This should not affect throughput since there is only a short space between the two intersections that accommodates only a few vehicles.

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Housing:

Additional housing opportunities for **lower income staff** need to be provided on or near the core campus or other commercial ventures to lessen the need for lengthy commutes via I-280 from San Jose, Daly City and other less expensive housing areas. There are additional opportunities, and desperate need for low income housing (not necessarily restricted to the Stanford community) to be provided in North Fair Oaks. The site at 2131 Sand Hill would be

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better used as housing even if it is low density as currently zoned by the county.

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CONCLUSION

This GUP ignores blatant significant negative impacts of the proposed developments with respect to the housing/jobs imbalance and the traffic impact. It also fails to provide accurate information as to bicycle, pedestrian and public transportation available on the San Mateo County portion of area. In recent years most of the commercial development on Stanford lands has occurred either in San Mateo County or at sites accessible from I-280 which has created an undue burden on West Menlo Park in particular, negatively affecting many aspects of our quality of life

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5.2.3.37 Responses to Comments from Janet Davis

I-DavisJ4-1 The Draft EIR Project Description defines the Project site as the 4,017 acres of Stanford lands within unincorporated Santa Clara County (please see Chapter 3, Project Description, pages 3-5 to 3-8).

Of the projects identified in the comment, only the existing Stanford University athletic fields, the existing Stanford Golf Course, and the “Quarry Road project” (Center for Academic Medicine) currently under construction are located within the General Use Permit boundary, and all were permitted under the 2000 General Use Permit and are all included in the 2018 environmental baseline. The other projects identified in the comment are either non-Project related development on Stanford land located outside the General Use Permit boundary, developments associated with Stanford affiliates located outside the General Use Permit boundary, or are projects not associated with Stanford.

Please 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, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary, for how both on-site development and off-site non-Project related development was accounted for in the Draft EIR.

Regarding the use of trip credits under the no net new commuter trip standard, please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, for additional detail on how the trip credit program works.

A comment is made regarding the proposed parking reserve and its potential effect on the no net new commuter trip standard. Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of how additional parking supply would still allow Stanford to meet the no net new commuter trip standard.

I-DavisJ4-2 Level of service traffic impacts at 95 study intersections are fully addressed in Draft EIR Section 5.15 Transportation and Traffic, and mitigated to the extent feasible. In addition, the Transportation and Traffic section also provided a VMT evaluation for the proposed Project.

With respect to the Project effect on the jobs/housing imbalance, please see Response to Comment A-PV-3.

I-DavisJ4-3 With respect to the Project effect on property taxes, please note that socioeconomic effects are outside the scope of CEQA, and consequently are not addressed in this EIR. Please see Master Response 1: Non-CEQA Comments.

A general comment is also made regarding the impact of the Project on San Mateo County. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

I-DavisJ4-4 This comment is in regard to an existing condition, not related to the proposed Project. Please see Master Response 1: Non-CEQA Comments.

I-DavisJ4-5 Impacts of the Project on housing affordability 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 10: Affordable Housing.

I-DavisJ4-6 Please note that quality of life effects, including certain issues cited in the comment, such as inconveniences associated with driving in traffic, and negative interactions with other people experienced while driving, are outside the scope of CEQA, please see Master Response 1: Non-CEQA Comments.

With respect to existing issues related to traffic congestion, traffic and bicycle safety, and construction traffic, please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. Please also refer to Section 5.15 Transportation and Traffic, which addresses all applicable Project and contribution to cumulative effects on transportation associated with the construction and operation of the proposed Project.

With respect to issues related to stormwater runoff quality, please refer to Draft EIR Section 5.9 Hydrology and Water Quality, which addresses all applicable Project and contribution to cumulative effects on hydrology and water quality associated with the construction and operation of the proposed Project.

With respect to issues related to diesel odor and traffic noise please refer to Draft EIR Section 5.2 Air Quality and 5.11 Noise and Vibration, which addresses all applicable Project and contribution to cumulative effects on air quality, health risk effects and noise associated with the construction and operation of the proposed Project.

I-DavisJ4-7 If the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, then no additional mitigation would be required to address traffic congestion under the EIR's mitigation measures. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of alternate mitigation if Stanford does not achieve the no net new commute trips standard.

As illustrated in Figure 5.15-1 and presented in Table 5.15-1 of the Draft EIR, intersections between I-280 and the Stanford campus on Sand Hill Road, Alpine Road, and Santa Cruz Avenue are analyzed in the Section 5.15, Transportation and Traffic. The project impacts at these intersections are presented in Impact 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. Where significant impacts are anticipated to occur absent satisfaction of the no net new commute trips standard, physical intersection improvements are identified if improvements are feasible. 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 could 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.

Consistent with policies of the Stanford Community Plan, the Draft EIR also recognizes that it would be preferable to avoid significant intersection impacts through trip reduction programs, rather than constructing the identified intersection improvements. Mitigation Measure 5.15-2 encourages programs that increase use of alternative commute modes by establishing the no net new commute trips standard.⁹ The standard is a performance standard that is measured by the County by monitoring the number of vehicles that cross the campus cordon, as adjusted by trip reduction credits. As specified by the policies of the Stanford Community Plan, the County affords Stanford flexibility as to how it achieves this performance standard. Nevertheless, each of the mitigation measures suggested by the commenter is addressed as follows:

1. A park and ride near I-280: 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 the County could consider trip reduction credits for an offsite facility such as a

⁹ 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.

Park-and-Ride, Stanford has indicated that this is not a means it intends to employ. As noted above, the County affords Stanford flexibility as to how it achieves vehicle trip reductions and does not dictate the specific programs that Stanford must employ. It should also be noted that although a park-and-ride approach might reduce trips crossing the cordon, it could encourage more vehicle trips from other destinations to the park-and-ride facility, potentially increasing overall vehicle miles traveled and greenhouse gas emissions. By contrast, increased transit ridership for the entire length of trips to and from campus can avoid these additional impacts while also reducing trips crossing the cordon.

2. Commuter bus from San Jose to I-280: Stanford has advised the County that it intends to continue to evaluate the need for the expansion of express bus services and commuter shuttle bus routes that serve the campus under the 2018 General Use Permit. Currently, Stanford subsidizes bus service from the East Bay and provides affiliates with Smart Passes that allow them to ride VTA services for free.
3. Shuttle extensions from Ladera, Portola Valley and Woodside: Multiple comments suggest expanding the Marguerite shuttles into the neighboring communities. Currently Marguerite shuttles provide service to the Town and County Shopping Center, San Antonio Shopping Center, the Stanford Research Park, SLAC National Accelerator Laboratory, Oak Creek Apartments, Safeway, Rosewood Hotel, and other intermittent stops on El Camino Real. Because the Marguerite shuttle is a private shuttle system, the capacity and route planning are evaluated continuously and capacity is expanded when there is sufficient demand.
4. Coordination with SamTrans: Stanford staff is currently engaged with SamTrans on their Express Bus Study,¹⁰ which is evaluating a route that would access the campus from I-280.
5. Tunnel from I-280: Construction of a tunnel from I-280 to the Stanford campus would not address the significant impact at the I-280 northbound off-ramp, nor would such a tunnel be more certain than the mitigation measure that has been identified in the Draft EIR. Consistent with the circulation policies in the Stanford Community Plan, 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. Constructing a tunnel would be costly, could result in greater adverse environmental impacts associated with earth-moving and construction activity, and would not address a significant intersection impact of the proposed Project (I-280 NB Off-Ramp/ Sand Hill Road) as identified in the Draft EIR. It could also encourage more vehicle trips, potentially increasing overall vehicle miles traveled and greenhouse gas emissions.
6. Crosswalks on Junipero Serra and Alpine Road: The Draft EIR evaluated the intersection of Junipero Serra and Alpine Road (Intersection #25). The project impacts at this intersection are presented in Impact discussions 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. The analysis concluded that the Project would not result in a significant impact at

¹⁰ See http://www.samtrans.com/Planning/Planning_and_Research/US-101_Express_Bus_Feasibility_Study.html.

this location. Therefore, construction of crosswalks on Junipero and Alpine Road would not address a significant impact of the proposed Project.

7. Removal of bulbout on Junipero Serra Boulevard between Alpine Road and Sand Hill Road: The Draft EIR evaluated the intersections of Junipero Serra and Alpine Road (Intersection #25) and Santa Cruz Avenue/ Sand Hill Road (Intersection #7). The project impacts at these intersections are presented in Impact discussions 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. The analysis concluded that the Project would not result in a significant impact at these locations. Therefore, removal of a bulbout on Junipero Serra Boulevard would not address a significant impact of the proposed Project.
8. Bicycle speed limits and ADA compliance at the trail on the Alpine Road and Junipero Serra Boulevard undercrossing: The undercrossing of Alpine Road and Junipero Serra Boulevard is under the jurisdiction of Menlo Park. Bicycle speeds cannot be controlled by the County of Santa Clara or Stanford. The Draft EIR evaluated the intersection of Junipero Serra and Alpine Road (Intersection #25). The Project impacts at this intersection are presented in Impact discussions 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. The analysis concluded that the Project would not result in a significant impact at this location. Bicycle speed limits and other improvements to facilities at this intersection would not address a significant impact of the proposed Project. To the extent that ADA improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.
9. Reengineering of the Alpine Road/Junipero Serra Boulevard undercrossing to improve conditions for pedestrians and bicyclists: The Draft EIR evaluated the intersection of Junipero Serra and Alpine Road (Intersection #25). The project impacts at this intersection are presented in Impact discussions 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. The analysis concluded that the Project would not result in a significant impact at this location. Improvements to this intersection to address conditions for bicyclists and pedestrians would not address a significant impact of the proposed Project. To the extent that such improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.
10. Redesigning the intersection of I-280 interchanges: Mitigation Measure 5.15-2 identifies the improvement to the I-280 northbound off-ramp that is needed to address the significant impacts of the Project.
11. Provide pullouts and bus stop shelters at Stowe and Bishop: The Project would not result in a significant impact on Alpine Road at Stowe and Bishop. To the extent there is a safety concern at the Alpine/Santa Cruz/ Alameda de las Pulgas Corridor, this is an existing condition and not an impact of the proposed 2018 General Use Permit. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.

12. Add barricades along Alpine Road and Wildwood Lane to protect pedestrians and bicyclists: The Project would not result in a significant impact on Alpine Road at Wildwood Lane. To the extent there is a safety concern at the Alpine/Santa Cruz/Alameda de las Pulgas Corridor, this is an existing condition and not an impact of the proposed 2018 General Use Permit. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.
13. Place a barrier at the Hewlett Foundation back gate to prevent U-turns: The Project would not result in a significant impact at the Hewlett Foundation back gate on Alpine Road. To the extent there is a safety concern at the Alpine/Santa Cruz/Alameda de las Pulgas Corridor, this is an existing condition and not an impact of the proposed 2018 General Use Permit.
14. Install signage to direct drivers to the hospital: The Stanford Healthcare facilities in Palo Alto are not the subject of the proposed 2018 General Use Permit.
15. Work with SamTrans on transit service in West Menlo Park to enable Menlo Atherton High School students to get home: Activities at Menlo Atherton High School are not the subject of the proposed 2018 General Use Permit.
16. Items 16, 17 and 18 duplicate items 1, 2 and 3, above.
17. Items 16, 17 and 18 duplicate items 1, 2 and 3, above.
18. Items 16, 17 and 18 duplicate items 1, 2 and 3, above.
19. Eliminate double semi-dump trucks from Alpine Road: Vehicle Code Section 35701 allows San Mateo County to restrict vehicles by ordinance.¹¹ Alpine Road is a designated arterial roadway and is designed for heavy vehicles. San Mateo County does not restrict vehicles on Alpine Road. The County of Santa Clara has no jurisdiction and control over Alpine Road, and therefore cannot prohibit vehicles from using a public road that the vehicles lawfully are allowed to use. Further, the Draft EIR does not identify a significant impact that would result from the proposed Project on Alpine Road. For these reasons, restrictions on the use of Alpine Road are not identified in the Draft EIR as mitigation measures.
20. Monitoring/permitting system for construction trucks to control speeding: Mitigation Measure 5.15-1 as revised in Chapter 2 requires use of 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, and requires Stanford to make feasible attempts to avoid construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays to avoid the commute hours. The County of Santa Clara has no jurisdiction and control over enforcement of speed limits on Alpine Road.
21. Install arrows at the junction of Sand Hill where the lane turns under the Buck Estate: The Project would not result in a significant impact at Sand Hill Road near the Buck Estate. To the extent there is a safety concern at this

¹¹ See http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=VEH&sectionNum=35701.

location, this is an existing condition and not an impact of the proposed 2018 General Use Permit. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.

22. Enlarge merge lane at the beginning of Alpine Road by the Buck Estate: The proposed Project would not result in a significant impact at the beginning of Alpine Road near the Buck Estate. To the extent there is a safety concern at this location, this is an existing condition and not an impact of the proposed 2018 General Use Permit. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.
23. Enlarge the bike lane heading toward Portola Valley on the West side of Alpine Road and provide for better maintenance for trimming of foliage. The proposed Project would not result in a significant impact on Alpine Road. To the extent there is a safety concern at the bike lane in this location, this is an existing condition and not an impact of the proposed 2018 General Use Permit. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.
24. Restrict access to parking at the Piers Lane Gate: The Project would not result in a significant impact at Piers Gate. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements. The San Mateo County Alpine Road Traffic Corridor Study¹² analyzes the current conditions on Alpine Road and outlines a preferred set of improvements, including reconfiguration of parking at the Piers Lane Gate and treatment for the Alpine Road interchanges with I-280.
25. Address bicycle access on Junipero Serra Boulevard between the Alpine Road and Junipero Serra Boulevard intersections: The conditions at Alpine Road and Junipero Serra Boulevard 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. To the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of 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.

¹² See <https://publicworks.smcgov.org/alpine-road-traffic-corridor-study>.

- I-DavisJ4-8 Please see Response to Comment I-DavisJ4-5, above.
- I-DavisJ4-9 With respect to the Project effect on the jobs/housing imbalance, please see Response to Comment A-PV-3. With respect to providing information on bicycle, pedestrian and public transportation available in the San Mateo County, please see Response to Comment I-DavisJ4 and Response to Comment I-DavisJ6 and Response to Comment I-DavisJ7. With respect to non-Project development occurring outside the General Use Permit boundary, please see Response to Comment I-DavisJ1.

Comment Letter I-DavisJ5

From: [Janet Davis](#)
To: [Rader, David](#)
Cc: [Don Horsley](#); [Michael Callagy](#); [Warren Slocum](#); [Kirsten Keith](#); [Raymond Mueller](#); [Catherine Carlton](#); [Ron Snow](#); [Cheryl Phan](#); [Molly Glennen](#); [Gwen Leonard](#); [Charmaine Conui](#); [Diana Shu](#); [Steve Monowitz](#); [Robert & Esther Dicks via Gmail](#); [Rebecca Altamirano](#); [Diana Gerba](#); [Susie Cohen](#); [Virginia Chang Kiraly](#); [Jerry Hearn](#); [Lennie Roberts](#); [Joe Lo Coco](#); dshu@co.sanmateo.ca.us; [REDACTED]; [Arlene Lindblom](#); [Jean Harman](#); [Rick Voreck](#); [Diane Schiano](#); [Ginger Holt](#); [REDACTED]; [Gunter Steffen](#)
Subject: Stanford's GUP - More Objections
Date: Thursday, November 30, 2017 2:13:43 PM

I have already written a very lengthy objection based on my personal experience of the impact that Stanford's unbridled growth has had on my quality of life and I want to add more objections based on subsequent reflection.

There is absolutely no reason why Stanford should get a "pass" on **17+ years** of additional construction. There are several eminently reasonable alternatives: (a) **Have a development cap** that is substantially less than that sought, (b) **Have each and every project subjected to a DEIR** which is what other entities would have to have, (c) **Have phased development** for each couple of years so that there would be some idea of what the area is like given the fluctuations in the economy, (d) **require that Stanford initiate planning and construction of a tunnel** under the foothills to connect with Campus Drive East or West that will not adversely affect wildlife, (e) **Make Stanford follow CEQA requirements that they take into account the cumulative effect of their (and other) development that specifically affects San Mateo county.**

Since the GUP can apparently allow a change of direction or swapping, as was demonstrated by the Quarry road proposal **any such 17 year "plan" is essentially "Pie in the Sky" and has no relevance as to what will actually be built.** This is not good urban planning and leaves both Santa Clara and San Mateo "up in the air" as to long term urban planning for their counties.

As stated before and detailed in several respects, **the section on Traffic is fatally flawed, inaccurate and even deceptive.** It also **does not adequately deal with the "No new net trips" and the exceptions thereto.** It especially does not address **how the exceptions get allocated:** i.e. a credit in Palo Alto would have zero impact on traffic in West Menlo park. It does not adequately explain **why there are 2000 parking spaces added if traffic were the same as in earlier years.** It does not take into account the **wear and tear on San Mateo Roads** as a consequence of all the added traffic, especially the construction vehicles. One impact that can be clearly seen is the erosion and subsidence underneath the bridge between the Sand Hill and Alpine intersections. It does not address the dangers to cyclists at that location, or the fact that many of them have taken to using the pedestrian path at the peril of those pedestrians and less skilled cyclists. It does not address the **extra expenses that the San Mateo county has had to incur because of this increased traffic.** As a long time Alpine road resident I know for an absolute fact that the "No New Net Trips" is an absolute fabrication. The plans call for **license plate reading of all vehicles entering the campus,** yet this is not elaborated on, and the technology is not even developed as of now, so this is mere theory, plus this is going to be anathema to many people.

At present **emergency vehicles are held up** at the intersections during heavy traffic and there is often no way for them to circumvent gridlocked vehicles. There is no data from the MPFD on how many trips they have to make in this area. This is critical for Stanford Weekend residents and those accident victims on 280. There is no analysis of vehicles that use the 280 on/off ramps at Alpine and then go to or from Sand Hill,, which is a very frequent occurrence. **There is no analysis of the impact of additional traffic heading to or from**

the new hospitals – which is substantial. There is **no analysis of the accident data** for the area in the vicinity of the Alpine/Sand Hill intersections which is horrendous.

There is **no analysis that I found regarding construction traffic** which during the last spate of construction resulted in one double semi-truck every 17 seconds along Alpine road at some periods. There is **no analysis of the pollution from these trucks, most of which are diesel which generate cancer causing fumes.**

No mention I found of truck routes or reason why Alpine Road became designated as a truck route (when the Alpine Road intersection was expanded) when the entirety of Junipero Serra, leading up to Alpine for bids all trucks over 7 tons, which would disallow such a truck route.

Affordable and other Housing:

Even the GUP acknowledges that in excess of 2000 new housing units will be required.

Nothing indicates where these will be or how they will be generated, or at whose expense.

The comment that \$20/sq. ft will be allocated for affordable housing does not specify how, when or where this will be allocated, and the figure is way too low to deal with the influx of new employees. Apparently the amount promised under the 2000 GUP has not been fully utilized, and as far as I know nothing has been allotted to San Mateo County. Since many of the lower paid employees commute from as far away as the E. Bay or Santa Cruz County, the 6 mile radius for compensatory payments is insufficient.

It is disingenuous to claim that housing will be provided while the university is pursuing commercial or non residential development along Sand Hill road, Quarry road, at SLAC, and has many projects in the industrial park, and Redwood city, all of which exacerbate the gap between jobs and housing. Many of the service workers at Stanford also come from E. Palo Alto, E. Menlo Park and N. Fair Oaks in Redwood City. How are these San Mateo areas going to be provided with funds for housing for their residents who work at Stanford facilities – including the hospital.

There is a premium on rental opportunities in San Mateo County areas in the vicinity of campus yet there is no data that I found that analyzed the impact on neighborhoods that are being transformed into other than single family homes, or B&B short term rentals in good part as a result of the increase in Stanford construction .

The Golf Course:

This appears to be within the academic boundary and part of the GUP, despite the fact that it is in the Foothills. Already that area has had some construction (and associated trucks) that has included a huge facility for golf carts, and the restaurant appears to be a burgeoning enterprise.

Total Square Feet:

Stanford typically generates detailed plans for many years out, and consults with the Board of Trustees way before plans are finally thought out. How did their Planning Facility come up with the exact square footage and what exactly is in the pipeline? The community is entitled to know what **exactly** is proposed since obviously someone at SU knows what they plan to build. Different types of facilities have vastly different impacts on needs.

Taxes:

There is a basic inequity in Stanford not paying property taxes on facilities within the academic boundary (and other areas) while developing at a far denser level than would be approved in surrounding districts, **and** while that same development has a disproportionately negative impact (both financial and quality of life) on other areas in the vicinity. This in effect is requiring all the surrounding jurisdictions to subsidize Stanford's ever increasing development, while at the same time impoverishing those jurisdictions that have to fund road maintenance, provide housing, deal with potential environmental impacts, increased accidents and longer emergency response times

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cont.

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CONCLUSION:

This GUP is a “Pig in a Poke.”

Surrounding jurisdictions and communities are being asked to give Stanford a free pass to do whatever they want, wherever they want for almost two decades. This is totally unacceptable. The 2000 GUP was a rip off for San Mateo County: they got nothing but negative impacts. The Santa Clara Supervisors abrogated all responsibility for the mitigations under that GUP and after over a decade of doing nothing, dumped the C-1 trail so-called mitigation on San Mateo County. This time around San Mateo County and the City of Menlo Park need to stand up for their citizens and require that Santa Clara county act responsibly.

6

5.2.3.38 Responses to Comments from Janet Davis

I-DavisJ5-1 The comment suggests 1) having a reduced development project, 2) conduct an EIR for each development project, 3) have a phased development, and 4) require planning and construction of a tunnel under the foothills to connect with campus Drive East or West. Please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study, Master Response 8: EIR Alternatives, Topic 1: CEQA Requirements for Alternatives and Alternatives Evaluated in the EIR, and Topic 2: Additional Detail on Potential Alternatives. Regarding an EIR for each development project, please also see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

The comment also indicates Stanford should take into account the cumulative effect of the Project and other development that affects San Mateo County. Please 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, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary. The “Quarry Road project” cited in the comment (Center for Academic Medicine) is located within the General Use Permit boundary, and included in the 2018 environmental baseline.

I-DavisJ5-2 The comment raises a variety of concerns about existing traffic conditions and about the Draft EIR analysis. Several issues raised in the comment are in regard to an existing condition, not related to the proposed Project. Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

Draft EIR Section 5.15 Transportation and Traffic addresses all applicable Project and contribution to cumulative effects on transportation associated with the construction and operation of the proposed Project. Regarding the designation of Alpine Road as a truck route, please see Responses to Comments I-DavisJ2-2 and J4-7. For all other issues related to traffic raised in the comment that pertain to the Draft EIR evaluation, please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, Topic 9: Design Hazards and Safety Impacts, and Topic 13: Parking Supply and Restrictions; and Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.

I-DavisJ5-3 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 see Master Response 1: Non-CEQA Comments, and Master Response 10: Affordable Housing.

However, 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.

I-DavisJ5-4 The comment indicates construction has been occurring in the Stanford Golf Course. This construction is related to development authorized under the 2000 General Use Permit, and is not associated with the proposed 2018 General Use Permit. See Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

This comment does not address the adequacy of the Draft EIR. However, the amount and distribution of academic and academic support and housing that would be developed under the Project is set forth in Stanford's application for its proposed 2018 General Use Permit. Stanford's stated project objectives are presented in the Draft EIR Project Description, pages 3-1 to 3-2.

I-DavisJ5-5 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA.

I-DavisJ5-6 The comment expresses personal opinions regarding the proposed Project which do not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

From: [Janet Davis](#)
To: [Rader, David](#)
Cc: [Don Horsley](#); [Michael Callagy](#); [Kirsten Keith](#); [Rick Voreck](#); [Susie Cohen](#); [Diana Gerba](#); [Diane Schiano](#); [Raymond Mueller](#); [Cheryl Phan](#); [Ron Snow](#); [Molly Glennen](#); [Rebecca Altamirano](#); [REDACTED]
Subject: FURTHER OBJECTION TO STANFORD GUP
Date: Saturday, December 9, 2017 7:17:23 PM

OBJECTION TO STANFORD GUP

Need to Include Impact of Added Traffic From Other Stanford Facilities That Impact Alpine Road

Today, December 9, 2017, the new Lucile Packard Children's Hospital opened. This facility (according to CBS News) is more than twice the size of that which previously existed, and **500 additional staff have been hired to staff it.** The main hospital is also being enlarged and for which there will be hundreds of additional staff. This will have a huge impact on the traffic exiting I-280 along Alpine Road and Sand Hill, and the entire southern area of San Mateo county.

Despite the commercial operations (Fruit Stand, Pumpkin Patch and Christmas Tree Patch) at Webb Ranch on Alpine having been shut down in prior years because of the extreme traffic dangers, the Lessees set up, ***without the required permit***, another Christmas Tree lot. **After** the County Code Compliance officers issued a Violation notice, the lessees filed a request to reactivate the decades old Use permits for ***all three activities***.

There has also been a very significant and detrimental increase in the amount of vehicles going to and from, and parking at, the back entrance to the Stanford Dish which is located right by the off ramp from I-280 on Alpine Road

These are just three things that provide a significantly and increasingly negative impact on Alpine Road, and it is utterly ridiculous to claim that the monumental increase in construction on the main campus will have no significant impact on traffic in West Menlo Park, where most of that traffic to those facilities will flow. Stanford needs to plan for a tunnel that goes under the foothills and connects directly to the campus.

Janet Davis
Dec. 9, 2017

1

5.2.3.39 Responses to Comments from Janet Davis

I-DavisJ6-1 The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual 2018 General Use Permit projects.

The 2018 General Use Permit EIR is a program-level evaluation, and does not specifically consider individual projects. As such, construction impacts are addressed at a programmatic level. Project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at the time they are proposed to determine whether the environmental effects of the specific project were adequately disclosed in the 2018 General Use Permit Program EIR. Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

Please also refer to Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives for the discussion of a tunnel under the foothills.

Comment Letter I-Dicks1

From: [Robert & Esther Dicks via Gmail](#)
To: [Rader, David](#)
Cc: [plngbldg@smcgov.org](#); [Michael Callagy](#); [city.council@menlopark.org](#); [Diana Shu](#); [bwood@almanacnews.com](#); [Dave Price](#)
Subject: Concerned Citizen about Stanford Development and the Impact to Local Communities
Date: Tuesday, November 14, 2017 10:18:19 PM

County of Santa Clara

Department of Planning and Development

Attention: David Rader

County Government Center

[70 West Hedding Street, San Jose, CA 95110](#)

Phone: [\(408\) 299-5779](#)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard, but at all hours of the day. Traffic could worsen throughout the day and no mitigation funds would be paid.

1

The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park as it is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2

Additionally, funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from, or off of, our congested Corridor, this will not be possible.

3

Comment Letter I-Dicks1

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

4

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods and geographic area.

5

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting "keep clear" on sections of Alpine Road and bike lanes on Santa Cruz Avenue is not significant enough and does little to alleviate traffic jams and to make the roadways safer. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection, adding middle turning lanes on Alpine and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the safety and the lives of those in our part of town.

6

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt directly by West Menlo Park residents.

7

Respectfully,

Esther Dicks

Menlo Park, CA

5.2.3.40 Responses to Comments from Robert and Esther Dicks

I-Dicks1-1 Please see Response to Comment I-Appel-1.

I-Dicks1-2 Please see Response to Comment I-Appel-2.

I-Dicks1-3 Please see Response to Comment I-Appel-3.

I-Dicks1-4 Please see Response to Comment I-Appel-4.

I-Dicks1-5 Please see Response to Comment I-Appel-5.

I-Dicks1-6 Please see Response to Comment I-Appel-6.

I-Dicks1-7 Please see Response to Comment I-Appel-7.

Comment Letter I-Dicks2

From: [Robert Dicks](#)
To: [Rader, David](#)
Cc: mcallagy@smcgov.org; plngbldg@smcgov.org; ity.council@menlopark.org; [Barbara Wood](#)
Subject: Re Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Sunday, November 19, 2017 9:31:39 PM

November 19, 2017

Attention: David Rader
County Government Center
[70 West Hedding Street, San Jose, CA 95110](#)
Phone: [\(408\) 299-5779](tel:(408)299-5779)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

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The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

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2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

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It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

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The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

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In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

6

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

7

Comment Letter I-Dicks2

Sincerely,

Robert Dicks

[REDACTED]

Menlo Park, CA 94025

SMC resident

5.2.3.41 Responses to Comments from Robert Dicks

I-Dicks2-1 Please see Response to Comment I-Appel-1.

I-Dicks2-2 Please see Response to Comment I-Appel-2.

I-Dicks2-3 Please see Response to Comment I-Appel-3.

I-Dicks2-4 Please see Response to Comment I-Appel-4.

I-Dicks2-5 Please see Response to Comment I-Appel-5.

I-Dicks2-6 Please see Response to Comment I-Appel-6.

I-Dicks2-7 Please see Response to Comment I-Appel-7.

February 2, 2018

Mr. David Rader
Santa Clara County Planning Office
County Government Center
70 West Hedding St., 7th Floor, East Wing
San Jose, CA 95110
David.Rader@pln.sccgov.org

RE: Comments and Questions on Stanford 2018 GUP Draft EIR

Dear Mr. Rader:

Thank you for the opportunity to provide comments and questions regarding the Stanford 2018 General Use Permit (GUP) Draft Environmental Impact Report (DEIR). I look forward to the County's responses being included in the Final EIR.

1. A maximum buildout study must be completed and maximum buildout established.

Under the 2000 GUP and Stanford Community Plan, the County required Stanford to conduct a Sustainable Development Study that included an assessment of maximum buildout. In 2009, Stanford finalized the Study, but failed to adequately address maximum buildout. The 2000 Stanford Community Plan is very clear about the requirement to study maximum buildout, mentioning it directly three times.

"The Sustainable Development Study shall identify the maximum planned buildout potential for all of Stanford's unincorporated Santa Clara County land, demonstrate how development will be sited to prevent sprawl into the hillsides, contain development in clustered areas, and provide long-term assurance of compact urban development." (Page 17)

SCP-GD 12: "Determine and define the long-term incremental growth potential for Stanford lands, and identify the maximum planned buildout potential and all appropriate areas of potential development through completion of a Sustainable Development Study. (Page 19)

SCP-GD (i) 3: "Require that Stanford prepare and submit to the Board of Supervisors for approval a Sustainable Development Study to determine the maximum appropriate buildout and development location potential for all of Stanford's unincorporated lands." (Page 19)

This obligation to assess maximum buildout should be completed prior to the release of the Final EIR so that potential long-term impacts can be evaluated in the document. Given the request for a continuation of a 1.2% compound growth rate for at least the next 17 years, and potentially again beyond that, it is important that the County understand what the maximum

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buildout of the campus might look like. A compounded 1.2% growth rate means that for each GUP period, the total amount of growth would increase, a prospect that is not sustainable.

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cont.

Maximum buildout should be established under the 2018 GUP.

2. The Stanford foothills should be protected from development in perpetuity.

As a mitigation to prevent foothills development, policy changes should be put in place to assure that the Academic Growth Boundary (AGB) remains in place in perpetuity. Based on the 2009 Sustainable Development Study, the trigger for possible changes to the AGB is 17.3 million square feet of development on campus. The projected total development prior to the start of the 2018 GUP is 16,893,461 square feet, or approximately 406,500 square feet short of the trigger. This means that the trigger will be met even before the current sunset of the AGB in 2025. The policy implications of this are not addressed in the DEIR. The DEIR needs to note this trigger mechanism as well as the expiration of the 4/5ths vote requirement to change the AGB in seven years as likely weakening the long-term protection of the foothills.

Stanford's A-1 zoning is unique for such an institution in unincorporated Santa Clara County in that there is no density limit. In 2000 the Stanford foothills were re-designated from "Academic Reserve" to "Open Space and Field Research," which was a positive step. However, this is not true zoning, and there are no long-term density restrictions, such as "Hillside Zoning" elsewhere in the County or an established floor-area ratio (FAR), that provide a sense of Stanford's development rights.

If the Stanford foothills were zoned for density, it could be argued that the County should pursue a Transfer of Development Rights (TDR), shifting Stanford's development rights in the foothills to the core campus. In other words, Stanford would be allowed to develop the core campus more densely, which they're already doing, in exchange for permanent protection of the foothills. It is not right that Stanford is pursuing such high density on the core campus, yet reserves the right to develop the foothills at a future date.

The County should explore a solution similar to a TDR that permanently protects the Stanford foothills in exchange for increased density on the core campus.

3. Inadequate analysis of the impact of additional workers, staff, post docs, faculty and graduate students on traffic congestion, affordable housing and greenhouse gas emissions.

According to the 2018 GUP application, the net increase in campus population from 2018 GUP buildout to 2035 is 9,610 people for a total of 45,600 people working or studying on campus (not including family members). It is estimated that there will be 1,200 additional graduate students, 967 more post docs, 789 more faculty, 2,101 more staff, and 1,074 additional daily workers. Based on these figures, by 2035 there would be a shortfall of 2,545 units for graduate students not housed on campus and a shortfall of about 3,700 units for post docs, faculty and staff not housed on campus or not housed off campus through Stanford. Of the population

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increase at Stanford through 2035, an estimated 6,288 of the increase, or about two-thirds, would be employees or workers, most living off campus.

The impact of the proposed 2018 GUP in increasing housing demand in the region is deemed insignificant in the context of the overall growth projections in the region, and that the housing for these additional employees and workers will be dispersed in various communities. This makes short shrift of the seriousness of the affordable housing crisis and excuses the impact due to the fact that there will be growth occurring that is much more than is proposed in the 2018 GUP. To the extent that development proposals directly impact the demand for more housing in an extremely impacted market, it should not be deemed “insignificant”. More specifically:

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- An inadequacy in the EIR analysis is the omission in the evaluation of local housing shortage impacts on transportation and CO2 emissions of the projected increase of 1,074 daily workers and 1,127 part-time workers, temporary or seasonal workers, for a total of 6,395 daily workers and 11,267 part-time, temporary or seasonal workers by 2035. Currently only a very small percentage of the worker population can afford to live near campus, already causing significant impacts on vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions, and those impacts will be exacerbated by the 2018 GUP since there is virtually no new housing for the worker population.

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- The DEIR also fails to evaluate the worsening shortage of affordable housing available for graduate students, post docs and staff, and the potential impacts of increased VMT and GHG emissions.

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- More specifically, page 5.12-17 of the DEIR states that the estimated growth in off-site households resulting from the proposed 2018 GUP would include 83 graduate student households, 449 post-doctoral households 1,385 staff households, and 610 households for other workers. This calculation seems to significantly underestimate the off-site households. These figures imply that Stanford will house 518 post docs, but Stanford is proposing only 550 new units for both faculty and staff and approximately 900 more graduate student units. The 610 workers calculation is too low given the projected increase of 1,074 daily workers. Where are the other 464 workers going to live? Is there an assumption that some of the households will have two workers? How are these estimates determined?

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- Combining “Housing Units” and “Beds” without a clear delineation of how many are beds in a dormitory-type setting, and how many are in separate, discrete housing units makes it difficult to understand the impact on the jobs/housing imbalance and traffic impacts. Depending on the actual type of housing and allocation, it will have different traffic impacts. The DEIR needs to explain how it can accurately predict traffic impacts without a better breakdown of beds versus housing units.

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- The Housing Linkage Ratio to Academic Building Growth is not accurate for the projected density described in the DEIR. On page 5.11, the DEIR states that the density on campus as of 2035 is projected to be 3.16 persons per 1,000 square feet of academic development. This figure is consistent with USC (390 square feet academic space per student/faculty/staff) and Columbia University (326 square feet per student/faculty/staff). The existing standard of 826 square feet of academic space per student/staff/faculty significantly underestimates the actual density of additional students, faculty and staff projected in the 2018 GUP. The new standard should be 316 square feet of academic space per student/staff/faculty.

How was the original Housing Linkage Ratio determined? Did it have any basis in relating to the actual number of additional staff or students expected to occupy the additional academic space? Regardless of how it was calculated, the new ratio should actually be set to provide housing for all new workers or students occupying the new academic space given the reality of the acute housing shortage in the Stanford region.

For the 2.275 million square feet of academic building proposed, just to balance the increased number of students/staff/faculty with housing on or near campus within the 2035 horizon, 7,199 additional housing units on or near campus should be built. This is far more than the 3,150 units that are proposed to be built on campus in the 2018 GUP.

The very important context and rationale for the need to provide sufficient housing units for all of the projected growth is that the baseline housing shortage and traffic congestion as of 2017 is already severe and thus there is already an imbalance going into the 2018 GUP. I understand that the DEIR cannot analyze the baseline situation, but knowledge of the baseline situation is important as a rationale to require no net worsening of the housing impact due to the 2018 GUP.

- All 12 employment categories should be identified in the transportation impact analysis. Subcontracted workers, such as third party contractors, janitorial contractors, construction contractors and casual, contingent and temporary employees, account for nearly a third of off-campus trips and they have the highest VMT per capita.

- In the GUP application, Stanford does not survey the needs, behaviors and preferences of workers hired by third party contractors, janitorial contractors and construction contractors in its annual P&TS commuter survey. This should be done, as the data would provide more accurate VMT projections as opposed to relying on VTA default figures.

Are these workers eligible for the transportation benefit program that incentivizes lower emission trips? Without extending the transportation benefit program to these groups of workers, Stanford neglects the opportunity to decrease the emissions from 27.4% of off-campus trips.

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- On page 5.15-149 of the DEIR, the chart shows that the VMT per capita for workers is only 7.17 miles. This seems very low. According to SEIU, out of 1,200 union members, 50% live in San Jose, 10-15% live in the East Bay, 10% in East Palo Alto, and the rest in Tracy, Modesto and other far-away places. Based on these statistics, if they extrapolate to the non-union worker populations and staff positions, then the VMT is likely closer to the 23-mile figure and possibly higher.

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- Out of the 1,200 SEIU labor union members who work in the dining halls, as grounds keepers, technicians and in trades, only about 5 members reside in the Stanford West Apartments. The hourly wages of the labor union members ranges from \$16 per hour to \$56 per hour, and the average is around \$25 per hour. Based on the average of \$25 per hour, how much rent could the average worker afford and where does that force them to live? The 2018 GUP does not propose any new housing units for this worker population.

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- In addition, the 550 units allocated for faculty, staff, post docs and medical residents would accommodate an increase of other family members of approximately 1,298 people. Is this additional population accounted for in the traffic study?

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- The Peak commute period is defined as the one-hour period of time with the highest volume of traffic, as determined by traffic counts. The reality is that there really isn't a "peak hour" anymore, and peak traffic volumes now stretch to several hours in the morning and several hours in the afternoon/evening. Thus, the EIR should use a new standard in evaluating the peak commute impact to include the measurement and evaluation of the actual "peak commute hours," which may end up measuring closer to three-hour periods in the morning and afternoon/evening on weekdays.

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4. Errors in determining the service population GHG emissions and inconsistency with State GHG reduction goals.

Although the DEIR suggests there will be lower per capita CO2 emissions in 2035, the fact is that total GHG emissions across California should be 40% below 1990 levels by 2030 and 80% by 2050. Under the 2018 GUP, this will not be achieved, even with more efficient use of energy and increased renewables, due to the sheer amount of growth projected. Thus, even though the per capita energy demand would decrease, in section 5.5 of DEIR, the overall energy demand is projected to increase 9% over the 2018 baseline.

- The EIR should evaluate the feasibility of Stanford reducing its gross annual GHG emissions to 40% below its total 1990 emissions by 2030, and 80% below by 2050, and not only on a per capita basis. By achieving the total emissions reduction goals set by the State, Stanford would be a leader in proving the achievability of the goals.

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Comment Letter I-Drekmeier

- The EIR should also evaluate the feasibility of Stanford adopting a policy of carbon neutrality for all new construction to meet this goal within the scope of the GUP framework. 17
- The State’s GHG reduction goals partly rely on local governments’ land use planning and urban growth decisions because local governments have primary authority to plan, zone, approve and permit land development to accommodate population growth and the changing needs of their jurisdictions. In this regard, the County should assure that maximum GHG reduction efforts are made to accommodate growth. A significant element of this relates to adequate and affordable housing nearby to reduce VMT. 18
- In Section 5.15, the DEIR states that the VMT generation under the project would be substantially lower than regional or Countywide averages, but the VMT calculation doesn’t appear to fully reflect the worker population. Please provide evidence that the entire worker population VMT is accurately reflected. 19
- The Health Element of the County General Plan policy HE-G-5 states “support efforts to reduce GHG emissions from mobile sources such as reducing vehicle trips, vehicle use, vehicle miles traveled, vehicle idling and traffic congestion.” The 2018 GUP seems to come up short in terms of workers and staff who are not able to afford to live nearby, and many who travel very far to get to Stanford. 20
- Inaccurate Estimation of the GHG Efficiency Measurement. On Table 5-2-1 (p. 2214 of Volume 3), it appears that all undergraduate and graduate students are assumed to be workers because the projected number of “workers” is 49,428, and the total service population is estimated at 68,781, which is considerably higher than the entire projected campus population for 2035. How does the BAAQMD calculate the “service population”? Where is Table 6 of the May 2011 BAAQMD CEQA Guidelines that is noted in Table 5-2-1? It appears to count students living on campus twice—both in the “workers” column and again in the in the “residents” column. It makes no sense to double count a resident who works on site as both a resident and a worker—that appears to be double counting. The numbers don’t add up correctly, as the total campus population in 2035 is estimated to be 45,600. 21
- With a campus population of 45,600, which should be the more accurate service population, the efficiency metric used in the GHG Technical Report would actually be 2.82 MT CO₂e per service population member, which is above both the 2030 and 2035 significance thresholds (2.1 and 2.7, respectively). This therefore, would be a significant impact. 22
- In the VMT analysis section, faculty residents living in areas zoned as right for residential use are not included (“... the GUP does not apply to land uses within those areas that are permitted as of right. The single family and two-family residences in the faculty/staff 23

subdivision are permitted as of right, and therefore are not included in this VMT analysis.” p. 2080, Volume 3). If this is the case, then these residents shouldn’t be included in the GHG analysis.

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cont.

- The definition used for Jobs in Appendix PHD says that “Jobs are calculated as the sum of postdoctoral students, faculty, staff, and the average daily ‘Other Worker’ Population.” How are “jobs” and “workers” different and should the service population be based on FTE or “daily” workers? It appears that the sum total of all workers, including a considerable number of less than full-time and/or seasonal workers, is included in the service population. Please clarify this.

24

- On page 5.7-8 it states that the 2018 environmental baseline reflects Stanford’s commitment to acquire electricity from the Solar Generating Station in Kern County and receive renewable energy credits for the electricity produced there, which offset the non-renewable energy GHG emissions Stanford consumes locally. In addition, several building complexes will feature solar panels totaling 16 buildings that will generate 7,300 MWh/year. These two solar systems are expected to provide up to 53% of Stanford’s total electricity use, according to the DEIR.

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If the actual efficiency metric is more than estimated in the DEIR per the above comment, an important mitigation could be for Stanford to increase the amount of solar energy produced on its own buildings so that more electricity is generated locally and more than 53% of Stanford’s electricity is produced from renewable energy.

Page 33—Please explain the paragraph stating potential conflict with the 2017 Clean Air Plan.

26

5. Indirect impacts are significant and not adequately analyzed.

Page 5-3 of the DEIR under “Economic and Social Effects” states: “Under CEQA, economic and social effects by themselves are not considered to be significant impacts, and are relevant only insofar as they may serve as a link in a chain of cause and effect that may connect the proposed project with a physical environmental effect, they may be part of the factors considered in determining the significance of a physical environmental effect. In addition, economic and social factors may be considered in the determination of feasibility of a mitigation measure or an alternative to the proposed project.”

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- The impacts of the project need to be understood in context of their indirect impacts on the physical environment, particularly the shortage of affordable housing for thousands of workers, staff, post docs, grad students and medical residents who will not be accommodated under the proposed 2018 GUP housing proposal.

- Does the DEIR analysis of traffic, VMT and housing shortfalls include the impact of the new jobs created from projects that have been approved but not yet completed, such as the new Stanford Hospital and academic buildings off campus?

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6. The Alternatives Analysis is inadequate.

None of the alternatives analyzed in the DEIR includes a scenario with a full housing mitigation. The reduced project alternative makes some questionable assumptions—first that there will be an equal percentage reduction in housing and academic square footage, and that the 1.2% growth rate is a given and therefore the construction of the new buildings will run out before 2035, thus almost guaranteeing that Stanford would then need to apply for approval of additional development. Both of these assumptions are flawed, as the growth rate is not set in stone and the housing-to-academic space ratio could be changed.

29

A very appropriate alternative would be one that matches the proposed density of students/employees to occupy the new academic space at 3.16 persons per 1,000 square feet, matching 1 housing unit/bed per 316 square feet of academic development. One possible alternative would be to keep the total square footage proposed in the 2018 GUP of approximately 3.5 million square feet, but with more housing and less academic space. For example, for 1.6 million square feet of academic space, approximately 5,000 housing units would achieve a full housing mitigation. At about 397 square feet per unit, this would equate to approximately 2 million square feet of housing. This scenario is just over the 3.5 million square feet proposed in the GUP, but provides a simple calculation based on a full housing mitigation alternative.

Thank you for the opportunity to present my comments and questions about the Stanford 2018 GUP. I look forward to responses in the Final EIR.

Sincerely,



Peter Drekmeier
Former Councilmember and Mayor, City of Palo Alto (2006-2009)
Former Director, Stanford Open Space Alliance (1999-2001)

5.2.3.42 Responses to Comments from Peter Drekmeier

- I-Drekmeier-1 Please refer to 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.
- I-Drekmeier-2 No changes to the existing AGB location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.
- Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Drekmeier-3 As described on Draft EIR Section 5.12 Population and Housing, page 5.12-17 and shown in Draft EIR Appendix PHD, Table 12, the estimated demand for off-site housing resulting from the 2018 General Use Permit is 2,425 housing units. Impact 5.12-1 in the Draft EIR concludes that the increase in off-campus households anticipated with the Project represents a small fraction of the household growth projected for each jurisdiction by ABAG for the 2015-2040 timeframe. Please also see Master Response 9: Population and Housing Methodology and Calculations, and Master Response 10: Affordable Housing.
- Please also 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.
- Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. However, 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.
- Please also refer to Response to Comment I-Drekmeier-4 through Response to Comment I-Drekmeier-14, below, for responses to specific comments made on housing demand effects on transportation, VMT, and GHG emissions.

I-Drekmeier-4 With respect to how the Project population was accounted for in VMT estimates and CO2 emissions in the GHG analyses in the Draft EIR, please see Response to Comment O-SCOPE-10 and Response to Comment O-SCOPE-15.

Please also see Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled.

I-Drekmeier-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 see Master Response 1: Non-CEQA Comments. Please also see Master Response 10: Affordable Housing. All potential impacts of VMT and GHG emissions are adequately addressed in Section 5.15, Transportation and Traffic and Section 5.7 Greenhouse Gas Emissions in the Draft EIR. Please also see Master Response 13, Transportation and Traffic, Topic 11: Vehicle Miles Traveled.

I-Drekmeier-6 The methodology for calculating the projected increase in Stanford affiliates who would live off-campus during the 2018 General Use Permit period is described in detail beginning in Draft EIR Appendix PHD on page 14. Please also see Master Response 9: Population and Housing Methodology and Calculations, Topic 3: Off-Campus Households and Household Adjustment Factors.

I-Drekmeier-7 As described on Draft EIR Section 5.12 Population and Housing, page 5.12-16, based on current and historic occupancy rates, Stanford estimates that 10 percent of graduate student housing would continue to be occupied by couples (Stanford graduate students plus 2 percent Stanford student spouses and 8 percent non-Stanford student spouses) resulting in 1.1 residents per graduate student bed. Stanford also estimates that on average 2.57 residents would occupy each faculty and staff housing unit. Please also see Master Response 9: Population and Housing Methodology and Calculations.

I-Drekmeier-8 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Housing Linkage Ratio and Timing. The baseline housing shortage of the region is discussed on Draft EIR pages 5.12-4 and 5.12-5. Stanford-affiliated populations under baseline conditions (2018) are shown in Table 5.12-4 and Table 5.12-6 on pages 5.12-7 and 5.12-8, respectively. The total population housed on the Stanford campus in 2018 is shown in Table 5.12-5 on page 5.12-8. Presumably, the vast majority of the Stanford-affiliated population not housed on the campus under baseline conditions live in other communities throughout the Bay Area (see Table 13 of Draft EIR Appendix PHD). The fact that the entire Stanford-affiliated population is not housed on the Stanford campus does not imply that a housing shortage exists under baseline conditions.

However, as noted in Response to Comment I-Drekmeier-3, the Recirculated Portions of Draft EIR include two new housing alternatives (Additional

Housing Alternatives A and B) under which additional quantities of on-campus housing would be added. 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 its consideration of whether more housing should be constructed on the Stanford campus.

I-Drekmeier-9 Please see Master Response 13, Transportation and Traffic, Topic 11: Vehicle Miles Traveled for information on how trip lengths for Stanford workers (including third party contractors) were estimated.

I-Drekmeier-10 Third party contractors include some janitorial staff, some food service and daycare workers, and construction contractors. These non-Stanford affiliates are eligible for TDM incentives and enrollment in the Commute Club if sponsored by a university department or campus organization. Sponsors must confirm each individual's Stanford affiliation and on-campus worksite address and certify the hours and duration the individual is or will be at that address for official university business. Non-Stanford affiliates registered for TDM incentives work at retail outlets, childcare centers, cafes and restaurants on campus, UG2 Janitorial Services, Stanford Credit Union employees, employee agencies (i.e., Option1, Slingshot and Manpower), and Wells Fargo Bank. Contract and subcontract workers can be sponsored as part of this program. Other TDM programs, such as bicycling to campus and the Marguerite shuttle, are free to both Stanford and non-Stanford affiliates.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, and Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled for information on how VMT trip generation by third party contractors was estimated.

I-Drekmeier-11 According to Stanford's annual Commute Survey, the SEIU employees have a mode share of approximately 51 percent drive alone rate, meaning that 49 percent are using alternative modes of transportation, including bicycle and transit, to commute to work. Although members are distributed throughout the region, they are using alternative modes to access the campus, and these numbers are reflected in the VMT analysis. As a simplified example to illustrate how VMT is calculated: if one employee drives 14 miles to commute to the campus, and another employee drives 0 miles to commute to the campus because that employee takes Caltrain and a Marguerite, the average VMT for the two employees is 7 miles. Please see Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled for information on how trip lengths for Stanford workers were estimated.

I-Drekmeier-12 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, as discussed in Response to Comment I-Drekmeier-3, above, 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 actual occupancy of these additional units under these alternatives is unknown, but assumed to be potentially occupiable by unspecified proportions of some or all of the following groups: faculty, staff, postdoctoral scholars, and other workers.

I-Drekmeier-13 Trip generation associated with new on-campus housing units proposed as part of the proposed 2018 General Use Permit, including trips associated with family members of faculty, staff, post docs and medical residents, are included in the traffic analysis presented in the Draft EIR and in Draft EIR Appendix TIA. Please see Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution for additional detail.

I-Drekmeier-14 The Level of Service methodology used to evaluate traffic operations 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 the intersection, including those vehicles traveling 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 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.

I-Drekmeier-15 The metrics used in the EIR to assess the impacts of GHG emissions were developed by the BAAQMD for the purposes of assessing GHG impacts under CEQA from mixed-use development, such as proposed under the 2018 General Use Permit. Neither the BAAQMD nor any other air district in California have adopted a net zero significance threshold under CEQA. As indicated in Draft EIR Appendix GHG, Table 3.2.1, overall GHG emissions generated by Stanford within the study area in year 2035 with implementation of the 2018 General Use Permit would be 25 percent less than those generated in year 2015, and marginally below those under the 2018 baseline year.

The Project would accommodate future planned growth in a manner consistent with emission reduction targets in California. Specifically, BAAQMD states that GHG efficiency metrics were developed “for the emissions rates at the State level for the land use sector that would accommodate projected growth (as indicated by population and employment growth) under trend forecast conditions, and the emission rates needed to accommodate growth while

allowing for consistency with the goals of AB 32 (i.e., 1990 GHG emissions levels by 2020).”¹³ These metrics were then further modified to address increased reduction goals for years 2030 and 2050 set by the Governor. Consequently, because the BAAQMD has not adopted a net zero GHG threshold under CEQA and because the efficiency metric that was used as the basis for the analysis was developed to address plan-level analyses of GHG impact under CEQA, the efficiency metrics were used as some of the tools to assess potential impacts of the proposed 2018 General Use Permit. In addition, the quantitative analysis shows that greenhouse gas emissions under Project conditions would be lower than baseline emissions. Draft EIR Impact 5.7-2 addressed GHG impacts qualitatively based on consistency with state and local planning to reduce GHG emissions.

Project effects on energy demands are addressed separately and using different significance thresholds in Draft EIR Section 5.4, Energy Conservation, and found to be similarly less than significant.

- I-Drekmeier-16 Please refer to Response to Comment I-Drekmeier-15, above, regarding the significance criteria used to judge the Project contribution to GHG emissions, and the conclusions that these impacts would be less than significant. There is no requirement than the proposed Project achieve the same percentage reductions in GHG emissions as the State is required to achieve by 2030 and 2050. Lead agencies have broad discretion to select GHG significance thresholds most appropriate for a particular project. See CEQA Guidelines Section 15064.4(b).
- I-Drekmeier-17 Whether the County should require Stanford to achieve carbon neutrality for all new construction is a policy matter for the County Board of Supervisors to consider. Please refer to Response to Comment I-Drekmeier-15, above, regarding the significance criteria used to judge the Project contribution to GHG emissions, and the conclusions that these impacts would be less than significant. Therefore, a policy of carbon neutrality would not be necessary to mitigate a significant GHG impact.
- I-Drekmeier-18 Please refer to Response to Comment I-Drekmeier-15, above, regarding the significance criteria used to judge the Project contribution to GHG emissions, and the conclusions that these impacts would be less than significant. Please also see Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled.
- I-Drekmeier-19 The comment indicates the VMT calculation does not fully reflect the worker population.

¹³ BAAQMD Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, p. 17, October 2009.

Please refer to Response to Comment O-SCOPE-10, and Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled.

I-Drekmeier-20 Please refer to the discussion of implementation of TDM measures in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard; see also Topic 11: Vehicle Miles Traveled.

Please also 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). 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.

I-Drekmeier-21 The comment asserts inaccurate estimation of the GHG efficiency measurement. Please refer to Response to Comment O-SCOPE-15.

The comment also inquires about Table 6 from the 2011 Bay Area Air Quality Management District *CEQA Air Quality Guidelines* that is referenced in Table 5-2-1 in Draft EIR Appendix VMT. For informational purposes, a copy of that table is presented below:

TABLE 6
CALIFORNIA 2020 GHG EMISSIONS, POPULATION PROJECTIONS, AND GHG EFFICIENCY THRESHOLDS – LAND USE INVENTORY SECTORS

Land Use Sectors Greenhouse Gas Emissions Target	295,530,000
Population	44,135,923
Employment	20,195,661
California Service Population (Population + Employment)	64,330,584
AB 32 Goal GHG emissions (metric tons CO ₂ e)/SP ¹	4.6

Notes AB = Assembly Bill; CO₂e = carbon dioxide equivalent; GHG = greenhouse gas; SP = service population

¹ Greenhouse gas efficiency levels were calculated using only the “land use-related” sectors of ARB’s emissions

SOURCES: Data compiled by EDAW 2009, ARB 2009a, DOF 2009, ICF Jones & Stokes 2009

I-Drekmeier-22 Please refer to Response to Comment O-SCOPE-15.

I-Drekmeier-23 As noted on Draft EIR Appendix GHG page 1, the GHG analysis uses the same study boundary as the VMT analysis. Because the single-family and two-family residences in the faculty/staff subdivision are permitted by right, they

are not included in the study area of the VMT and GHG analyses. The residents that are included in both the VMT and GHG analyses are those that live within the study area boundary. The study area boundary includes all of the Academic Campus and Campus Open Space lands, including the Stanford Driving Range, which Stanford proposes to designate as Academic Campus rather than Medium-density Campus Residential. Thirty-eight faculty and staff housing units are included in the study area in the Searsville and Olmsted staff rental subdivisions. The study area within which the emissions are analyzed is shown in Draft EIR Appendix GHG, Figure 1-2.

- I-Drekmeier-24 Please refer to Response to Comment O-SCOPE-15. Please also see Master Response 9: Population and Housing Methodology and Calculations.
- I-Drekmeier-25 As explained in Response to Comment O-SCOPE-15, the GHG efficiency metric is correct as presented in the Draft EIR, and accordingly, Impact 5.7-1 is less than significant, and no mitigation is required.
- I-Drekmeier-26 As explained in Draft EIR Impact 5.7-2 on page 5.7-32, the 2017 Clean Air Plan contains transportation measures and measures related to energy, green building, waste management, water control of short-lived GHGs. Those Clean Air Plan measures applicable to the Project are identified in Draft EIR Section 5.2, Air Quality, Table 5.2-11. Table 5.2-11 provides a brief description of the control measure and identifies any existing or proposed mechanism that Stanford and surrounding local jurisdictions and transit agencies would have in place to implement these measures. Existing mechanisms or those included in the proposed 2018 General Use Permit would be consistent with most, but not all, of the relevant control measures of the 2017 Clean Air Plan. Because there are some control measures with which the Project as proposed may not be consistent, this impact is considered potentially significant. Where an implementation mechanism does not currently exist or is not identified in the proposed 2018 General Use Permit, mitigation measures are identified in this EIR [i.e., Mitigation Measures 5.15-2,¹⁴ 5.3-8(a)-(c), 5.3-9(a)-(c), and 5.3-11(a)-(c)] to ensure the Project's consistency with the 2017 Clean Air Plan.
- I-Drekmeier-27 Please refer to Response to Comment I-Drekmeier-3, above.
- I-Drekmeier-28 With regard to impacts related to new jobs from approved projects, please refer to 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, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary.

¹⁴ 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.

Regarding indirect impacts of affordable housing, please see Master Response 10: Affordable Housing. Please also 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). 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.

- I-Drekmeier-29 Please see Master Response 8: EIR Alternatives, Topic 1: CEQA Requirements for Alternatives, and Alternatives Evaluated in the EIR, and Topic 2: Additional Detail on Potential Alternatives.

Also, please note that the Recirculated Portions of Draft EIR also included and evaluated two new housing alternatives (Additional Housing Alternatives A and B) under which additional quantities of housing would be added to the proposed Project. Since Additional Housing Alternatives A accommodated all off-campus housing demand on campus, CEQA does not require that the same strategy also be evaluated as a mitigation measure.

Comment Letter I-Duisenberg

From: [jeannie duisenberg](#)
To: [Rader, David](#)
Subject: Maximum build out
Date: Wednesday, January 24, 2018 1:30:12 PM

Comment on Stanford's 2018 GUP application:

I support the inclusion of a maximum buildout number in Stanford's 2018 GUP application and suggest that approval be withheld until such has been added. Otherwise, we will face a repetition of the same thing that happened years after Stanford was supposed to include a maximum build out number for its last GUP. They said they couldn't do it and the plan was approved anyway. (Reminiscent of the bike/hike trail that Stanford was supposed to build around the DiSH).

1

Sincerely,
Jeannie Duisenberg

Palo Alto

5.2.3.43 Responses to Comments from Jeannie Duisenberg

- I-Duisenberg-1 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comment Letter I-EddyJ1

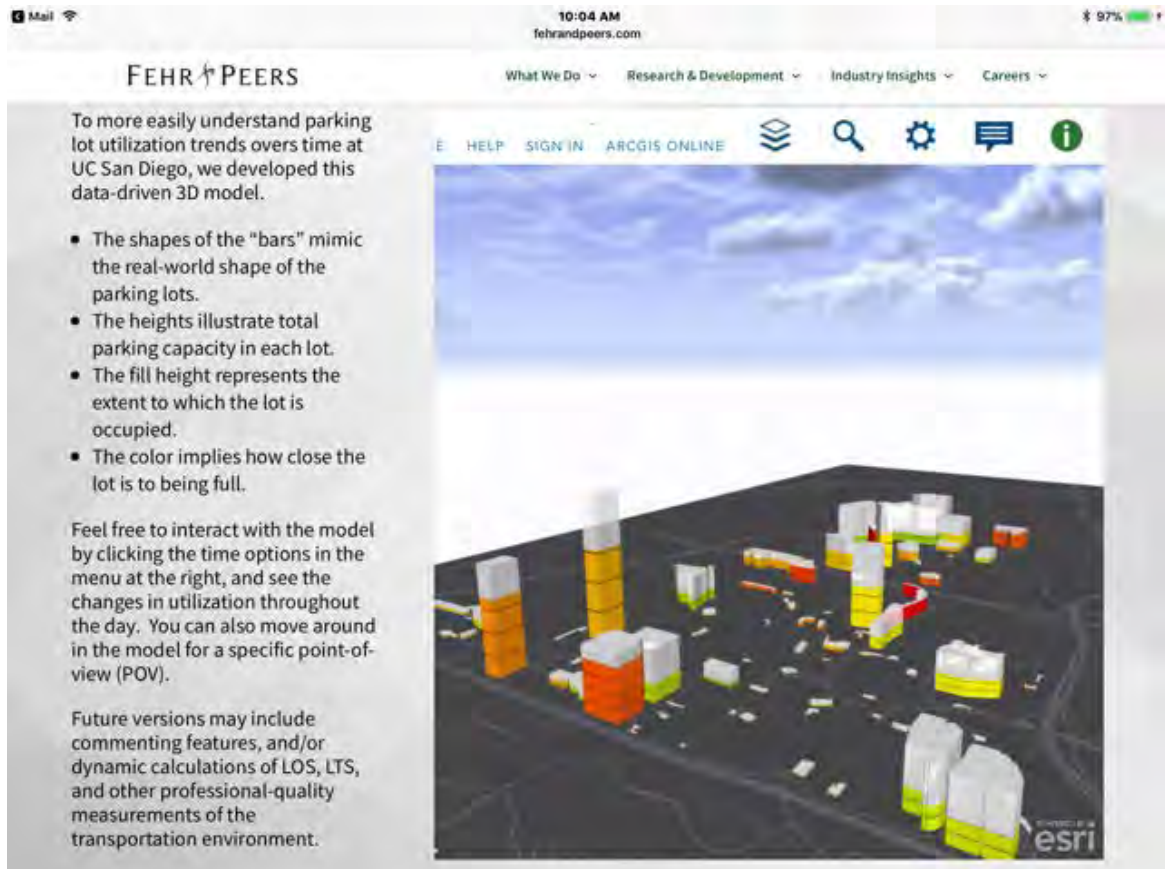
From: [Kumar, Kavitha](#)
To: [Rader, David](#)
Cc: PMitchell@esassoc.com; BBoxer@esassoc.com
Subject: Fwd: RE Stanford GUP, urge you REJECT TRAFFIC IMPACT COMPONENT
Date: Friday, February 2, 2018 7:12:20 PM
Attachments: [image1.png](#)

Not sure you got this.

-Kavitha Kumar

Begin forwarded message:

From: Jeb Eddy [REDACTED]
Date: February 2, 2018 at 4:17:18 PM PST
To: planning.commission@pln.sccgov.org
Cc: <kirk.girard@pln.sccgov.org>, <kavitha.kumar@pln.sccgov.org>
Subject: RE Stanford GUP, urge you REJECT TRAFFIC IMPACT COMPONENT



Dear Planners, Commissioners and Supervisors,
Fehr and Peers included the above image in a Parking Operations study for UC San Diego in 2017. The website includes video flyovers; viewers can get the big picture easily (SEE LINK AT END). The company offers sophisticated graphics as one of their professional services.

QUESTION:

Given these capabilities, why does Stanford's GUP application have far-below-state-of-the-art data images for the traffic component?

Comment Letter I-EddyJ1

This widely available visual technology could and should be applied to intersections and roadways.

I URGE YOU TO REJECT THE TRAFFIC COMPONENT until it is very significantly improved.

SUGGESTIONS/requests:

- a) show boundary and off-campus and regional traffic impacts much more clearly using selective ***3D images,*** so that MAJOR IMPACTS AND PRIORITY PROBLEMS ARE VISIBLE. At present the traffic impact analysis and reporting is a JUNGLE of low level detail, mostly in text form. The data is there, but needs to be totally reformatted for human consumption.
- b) Stanford should embrace much more fully its role in designing and implementing REGIONAL TRANSPORTATION solutions — computer modeling of alternatives, such as off-site parking, etc. (Not simple, I know — it's a great interdisciplinary problem, relevant to many other locations in USA and around the world, a suitable challenge for a great university.)
- c) The No Net Increase in peak trips is NOT an appropriate yardstick. Stanford should offer year-driven funded targets for trip REDUCTION at both peak and off-peak times, to reduce emissions.

Our geographic area is at a turning point in land use and transportation. You have a GREAT OPPORTUNITY to raise the level of analysis and response.
PLEASE ENSURE THAT STANFORD SERVES ITS MISSION AS **REGIONAL CITIZEN.** DO NOT ACCEPT THE CURRENT TRAFFIC IMPACT APPLICATION.

Jeb Eddy

[REDACTED]

Palo Alto

Here is the link to the dynamic web page of the UC San Diego parking report by Fehr & Peers. Drag your mouse around, or click on small rectangular pictures at bottom. The technology is worth way more than 1000 words, and can/should be applied to corridors and intersections:

<http://www.fehrandpeers.com/project/uc-san-diego-parking-operations-study/>

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cont.

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5.2.3.44 Responses to Comments from Jeb Eddy

- I-EddyJ1-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- I-EddyJ1-2 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- I-EddyJ1-3 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.
- I-EddyJ1-4 A general comment is made regarding raising the level of analysis. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.



County of Santa Clara
Department of Planning and Development

Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

Please hand in during the meeting or mail (address on back) or email by **December 4, 2017.**

Name:

Jeb Eddy

Organization (if any):

Address (optional):

City, State, Zip:

Palo Alto CA 94301

E-mail:

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

re Transp / Parking:

mainly
Dear County - A way to have a positive impact is to restrict on-campus parking for FOSSIL-FUEL-powered vehicles. DO NOT USE traditional ratios. Expand parking for ELECTRIC VEHICLES. with a rapidly rising ratio of EVs to FF Vehicles

(More space on reverse side)

AND: encourage CAR-POOLS via EVs.

5.2.3.45 Responses to Comments from Jeb Eddy

I-EddyJ2-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

From: [Penny Ellson](#)
To: [Rader, David](#)
Subject: Stanford GUP DEIR Comments
Date: Friday, February 2, 2018 4:20:19 PM

Dear Mr. Rader,

Here are my Stanford GUP DEIR comments. Kindly confirm receipt.

Thank you.

Penny Ellson

[REDACTED]
Palo Alto, CA 94306

Comments re: Stanford GUP DEIR

Assumptions Re: Caltrain Capacity Are Inadequate

After wading through 5,413 pages of the Stanford GUP DEIR, I came to the stunning realization that, though Stanford relies very heavily on Caltrain to mitigate transportation impacts, there are no proposed mitigations in the DEIR that would require Stanford to contribute a fair share toward creating the additional rail capacity they need. Then I read this from the Governor's Office of Regional Planning & Research in Caltrain's comment letter, "...lead agencies generally should not treat the addition of new (transit) users as an adverse impact." "Transit capacity is not evaluated as part of the DEIR's impact analysis." Mitigations related to supporting Caltrain capacity improvements are not offered—but the need for them is real. If there is not adequate rail capacity to meet new demand, those trips will shift to cars, creating real problems for regional and local road systems.

1

The DEIR assumes that rail capacity improvements will come in the projected time frame to support Stanford development. (Can anyone point to a time when this has happened before in the Bay Area?) Caltrain operational funding historically has been unstable, so any certainty about both timing and scope of capacity improvements sits on a shaky foundation. The DEIR takes this for granted and all other mitigation requirements rely on a certain percentage of Stanford trips being eliminated by Caltrain. This seems to me an erroneous assumption that should be corrected.

The GUP FEIR should acknowledge this uncertainty and require a Traffic Impact Analysis (TIA) for each Stanford building application moving forward to ensure that development and funding of anticipated rail and bus transit and street infrastructure improvements are keeping pace with assumptions of the GUP as GUP projects roll out.

2

There is huge uncertainty about funding for future rail capacity improvements. It looks to me as though Stanford is claiming all or most of the available future planned capacity (actually, more than funded capacity—Caltrain's letter mentions that six, not eight, cars are funded). The DEIR fails to consider impacts of background growth on the availability of rail capacity -- demand for Caltrain seats from other proposed development, including future growth in the Stanford Research Park and continued rapid growth in Palo Alto and other nearby communities (Google, Facebook, Palantir, etc. with related housing) Studying aggregate demand for Caltrain seats will be very important to understand whether the Caltrain capacity that the Stanford DEIR says is available for them is, in fact, available. Where is the analysis of aggregates? I don't see evidence that DEIR assumptions about available capacity for Stanford considered this and, they are, therefore, are incorrect.

3

The DEIR Doesn't Address the Problem of Increasing Car Trips & Increasing East/West Palo

4

Alto Street Congestion

DEIR mitigations include partial funding for motor vehicle intersection capacity improvements on county expressways and VTA-controlled roads—projects that will support county engineering jobs but that are inconsistent with the goals and policies of Palo Alto’s Comprehensive Plan. These auto capacity increases are coupled with proposals for thousands of new automobile parking spaces on Stanford campus.

I find the emphasis on increasing motor vehicle parking and motor vehicle LOS worrisome. We know what the outcome of that kind of planning will be...an increase in local car trips, which are likely to undermine gains made toward mode shift to foot-powered modes during the term of the last GUP both at Stanford and in the City of Palo Alto. Risk associated with increasing car trips makes streets feel less comfortable to people who walk and bike. It pushes foot-powered commuters back into cars. How does this set of auto capacity mitigations align with Stanford’s no net new trips goals? If not cars or rail, why not greater investment in Shuttle/bus options and bike/pedestrian improvements that provide better regional connectors?

Stanford could be required to help Palo Alto invest in maintaining east/west multi-modal (auto/bike/pedestrian) street operations by providing a fair share contribution toward Caltrain grade separations. This would minimize impacts of increasing train preemption delays on Alma and east/west roads that cross the rail corridor. It would also address safety problems of at-grade rail crossings on east/west drivers, bicyclists and pedestrians.

Stanford needs both greater train capacity and good multi-modal street operations to get commuters across town to campus. Key rail crossings to consider are: Charleston, Meadow, Churchill, Embarcadero, and possibly a bike/ped grade separation between Churchill and Meadow at midtown, per the City of Palo Alto Bicycle & Pedestrian Transportation Plan. This would also help to minimize impacts of Stanford auto traffic on local school commuters. In addition, it would enable provision of safer multi-modal connections for all Stanford commuters—consistent with Palo Alto Comprehensive Plan Goal T-1, Program T1.19.3, Policy T-2.4, Policy T-3.1, Policy T-3.2, Policy T-3.3, Policy T-3.15, Policy T-3.16,. All of the aforementioned rail crossings are part of the City of Palo Alto adopted School Commute Corridors Network and are, therefore, (see City Council, CMR October 27, 2003) required to get special consideration for infrastructure improvement and travel safety enhancement.

Aggregates Matter

The FEIR should consider planned growth in the Comp Plan EIRs and development proposals that are in the pipelines of Palo Alto, Menlo Park and Mountain View. Aggregates matter. The county recently overestimated available transit capacity in the EIR of another community’s project with devastating consequence. Let’s learn from that experience.

I agree that further evaluation is needed regarding impacts at specific intersections, including the Caltrain grade separation at Alma/Charleston. The analysis should assess impacts with and without grade separations. Stanford should pay a fair share toward grade separations.

I also agree that a fresh analysis of the peak periods of travel to and from campus is badly needed and that recommendations for future cordon counts should be based on that analysis.

No Net New Commute Trips: A Flawed Model

Stanford’s No Net New Commute Trips model is flawed. No Net New Commute Trips is defined as “no increase in auto trips during the peak commute times in the peak commute direction, as counted at defined cordon locations around the central campus. The peak commute period is defined narrowly as the one-hour period of time with the highest volume of traffic, as determined by the traffic counts. This narrow definition of the peak is the crux of a measurement problem because

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peak traffic periods are spreading out—a lot. On some of our school routes, peak times now begin to build before 8:30 when our students are commuting to school. The traffic rush can last up to 10:00am or later, depending on the street. Further, severe congestion restrains flow on approach streets and limits the number of cars that can reach the cordon gates and be counted during the narrow count hour. Congestion simultaneously keeps cordon count low and causes peak spreading.

In our SRTS partnership, we deal with peak time traffic safety impacts by collaborating with PAUSD to make sure that traffic impacts are considered in the setting of bell times. We stagger bell times of schools that are located in close proximity to each other. This is especially true where multiple schools are sited on collector and residential arterial streets (Middlefield, Embarcadero, Charleston/Arastradero, Meadow, Churchill) that also serve Stanford commuters. We set bell times to have foot-powered student commuters arrive at school before the peak-of-the-peak inbound regional traffic rush hits. This has gotten much harder with peak spreading. Peak spreading creates indirect auto traffic impacts on the safety of City of Palo Alto School Commute Corridors that is not measured in the DEIR though I pointed to it in my scoping comments.

8
cont.

The current data and analysis fails to provide an accurate measurement of the auto increases incurred by Stanford development that affect alternative commuters of all ages, including PAUSD students. A new measurement methodology should take into account morning and evening peak spreading. It should also look at impacts on afternoon school commutes. This change would be consistent with Stanford's stated goal of encouraging mode shift to reduce congestion, safety, and emissions impacts. Because of peak spreading, the current cordon count methodology no longer provides an accurate measure of Stanford's compliance with these goals. Please consider a methodology that measures real auto traffic increases more accurately, considers impacts on school commutes, and takes peak spreading into account. This would support SCP-C7-reduce auto travel in non-commute hours/directions. Data collection and measurement practice outlined in the DEIR fails to support SCP-C7.

9

Hanover Connection to Bol Park Path: Closing the Gaps

I want to acknowledge Stanford's thoughtful response to scoping comments about the Hanover bike/pedestrian connections to the Bol Park path that will serve Stanford-affiliated families who probably will be overflowed to Barron Park Elementary School, and will attend Gunn and Terman. This improved connection may also serve to shift Stanford auto trips that go in and out of the nearby areas. Closing this existing gap will provide a more comfortable and safe bike route for Stanford University, Stanford Research Park, and PAUSD school commuters. Thank you, Stanford, for hearing and responding to comments on those bike route gaps. I hope Stanford will work closely with City of Palo Alto staff to create plans that meet the comfort and safety needs of bike commuters of all ages and skill levels. These plans should be laid out in more detail in the FEIR mitigation plan.

10

I was also heartened to see (Table 5.2-11) TR7-Safe Routes to School and Safe Routes to Transit Measures proposal to construct improvements to circulation and safety improvements to Nixon ES and Escondido ES school routes, though the details are vague. These improvements should be spelled out more clearly as specific mitigations in the FEIR.

School site enrollment changes and traffic

As the PAUSD DEIR comments point out, there are errors in the DEIR's analysis of enrollment impacts. Because of this, the DEIR does not provide an analysis of which PAUSD schools would receive students from planned new Stanford residences. This analysis would help us understand whether school assignments will ensure safe, age-appropriate, active school commute route options. If safe, convenient routes for foot-powered commutes to school are not available, families will likely opt to drive. Auto drop-offs/pick-ups have the potential to generate four trips per day per family across the cordon. These trips should be projected in the car trips analysis. Was that done?

11

Comment Letter I-Ellson

If so, I could not find that information. Please point me to it.

11
cont.

Higher volumes of auto trips to PAUSD schools have the unstudied potential to disrupt safety and ease of walking and biking to schools for all PAUSD students which may lead them to turn back to driving solo to school. This should be considered an indirect impact of Stanford development on alternative school commutes in Palo Alto which should be studied. **Please consider whether school commute impacts might be mitigated by providing funding for school buses and/or crossing guards to assist Stanford families who might otherwise drive to school. See my scoping comment:** *“Consider how Stanford’s existing bus/shuttle service might augment PAUSD service for Stanford-affiliated PAUSD students to reduce morning school commute auto trips across the cordon area.”*

12

Measure Increased Auto Trips On City-Wide School Commute Routes

Stanford’s DEIR identifies intersection impacts on large arterial streets, but it does not study impacts on nearby neighborhood streets. We know that where arterials are severely congested, drivers will choose alternative cut-through routes (especially with the advent of Waze and similar apps) and this may affect school commute safety. The DEIR does not help us understand what these intersection impacts and the proposed mitigations (intersection capacity increases) may mean for nearby neighborhoods and school routes. Higher auto traffic volumes discourage alternative school commutes.

13

We know that intersection capacity increases and adding auto parking tends to attract more car trips. Please study how the identified intersection increased auto trips may affect nearby neighborhood streets. And study how much new auto traffic the proposed intersection capacity mitigations may draw from both Stanford and other large, local trip generator businesses and institutions. What would be the indirect impacts of those additional car trips?

Power to Grant Trip Credits

(Table 1-2, Summary of Impacts & Mitigation Measures, p. 1-37) Given that trip credits release Stanford from responsibility to mitigate auto trip impacts, it is inappropriate that the power to grant these credits and “...*determine the appropriate trip credit and monitoring methodology for each program which Stanford proposes to participate.*” is given to county staff who make these decisions out of the public eye. At minimum, affected local governments of nearby cities should be notified and offered the opportunity to comment. If there are trip credits Stanford wants, they should be granted through a public process—either this EIR process or some other agreed upon public process. They should not be quietly granted by county staff outside of the public eye. A confusing web of trip credit methodologies has evolved, and I think this may explain some of that problem.

14

DEIR Inadequately Explains How Credits May Be Used

It is not at all clear to me how credits may be used to offset increases in cordon trips. This should be spelled out in much greater detail. The explanation should include credits related to hospital trips.

15

Thank you for considering my comments.

Sincerely,

Penny Ellson

5.2.3.46 Responses to Comments from Penny Ellson

- I-Ellson-1 Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.
- The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity. The Draft EIR explains on page 5.15-155 that the Governor’s Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.
- Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for a discussion of capacity assumptions provided by the Caltrain Joint Powers Board.
- I-Ellson-2 The comment indicates the Final EIR should require a traffic impact analysis for each Stanford building application.
- Please refer to 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.
- I-Ellson-3 Please refer to Response to Comment I-Ellson-1.
- I-Ellson-4 The impacts in the Draft EIR for the proposed 2018 General Use Permit were identified based upon the worst-case assumption that Stanford’s transportation demand programs do 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.¹⁵ If Stanford does not add trips to local roadways, or offset its own trips by reducing trips by others, it does not contribute to the significant impact identified in the Draft EIR. The TDM programs that Stanford would employ to meet the no net new commute trip standard would reduce drive-alone trips, and would encourage bicycle and transit modes. 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

¹⁵ 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.

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.

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 early-2019, to be followed by CEQA analysis of that alternative in 2019.¹⁶

As noted in Draft EIR on page 5.15-94, 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. Draft EIR page 5.15-132 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/Charleston Road, no further mitigation is feasible.

Regarding grade separations, please refer to Response to Comment I-Ellson-1.

Also, please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity, and Topic 10: Bicycle and Pedestrian Analysis. Please also refer to 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.

- I-Ellson-5 Please refer to 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.
- I-Ellson-6 Please refer to Response to Comment I-Ellson-4.

¹⁶ Palo Alto City Council Staff Report ID #9100 April 16, 2018. (Timing has been updated.)

- I-Ellson-7 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).
- Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.
- I-Ellson-8 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.
- I-Ellson-9 Please refer to Response to Comment I-Ellson-7.
- I-Ellson-10 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.
- I-Ellson-11 The comment indicates that the PAUSD Draft EIR comments that there are errors in the Draft EIR analysis of enrollment impacts.
- Please refer to the responses prepared in response to the two PAUSD comment letters on the Draft EIR in this Response to Comments Document, and also refer to Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecast; this Master Response explains why there were no errors in the analysis of enrollment impacts.
- The comment does not provide an analysis of which PAUSD schools would receive students from proposed new Stanford residences to better understand school commute route options. Please refer to Master Response 12: Public Schools, Topic 2: Additional School Site.
- I-Ellson-12 The comment indicates higher volumes of auto trips to PAUSD schools have the potential to disrupt safety and ease of walking and biking to schools which may result in reverting back to vehicle commuting to school.

Please refer to Master Response 12: Public Schools, Topic 2: Additional School Site; and Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.

- I-Ellson-13 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods.

Neighborhood traffic was analyzed in Impact 5.15-5 (page 5.15-102) of the Draft EIR and the Draft EIR considered the potential for project-related traffic to affect 11 different neighborhoods in the communities surrounding the campus. The analysis found a less-than-significant impact. As described in Impact 5.15-2, the proposed project would mitigate the transportation impacts of its additional development and population growth either through a program of “no net new commute trips” or through the contribution of funding equivalent to Stanford’s fair share of the cost of improvements for adversely affected intersections. Funds would be used for improvements to intersections identified in the Draft EIR. If the use of funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area, which may include off-campus projects that encourage and improve use of alternative transportation modes or otherwise reduce peak period traffic

- I-Ellson-14 In 2003, Stanford, the County Planning Office and the County’s transportation consultant discussed potential methodologies for providing credits to Stanford. The County developed a set of draft guidelines, which were reviewed by the Community Resource Group, and the Planning Office approved the final guidelines on October 9, 2003. The Community Resource Group is made up of stakeholders from the surrounding jurisdictions.

The guidelines are presented in the “Stanford Traffic Cordon Count Credit Guidelines” dated October 28, 2003. The County Planning Office provided a revision to the guidelines to the Community Resource Group for review in April 2015, and the Planning Office approved the final revisions to the guidelines in October 2015.

Under the County-approved methodologies, the forms of trip reductions outside the cordon that are currently counted include: 1) Marguerite shuttle riders outside the cordon who are not traveling to a campus destination; 2) Hospital employees in the Commute Club; and 3) Hospital employees on the Stanford-subsidized East Bay bus service. Credits are submitted to the County for review as part of the annual traffic monitoring process and are reviewed by the Community Resource Group.

I-Ellson-15 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a detailed discussion of how trip credits are applied.

The Draft EIR addresses the impacts of development on the Stanford University campus, not the impacts of non-Project development at the Stanford University Medical Center or at other off-campus sites. Please refer to 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.

Comment Letter I-Epstein

From: [Charlotte Epstein](#)
To: [Supervisor Simitian](#); [Girard, Kirk](#); [Rader, David](#); [Kumar, Kavitha](#)
Subject: Comments on the Stanford 2018 GUP Proposal and the DEIR
Date: Wednesday, January 31, 2018 7:46:14 PM

I have lived in Palo Alto for almost 40 years and deeply appreciate all that Stanford University has provided to Palo Alto and to the rest of the world. I have also witnessed the increased demand for housing and the increased traffic which has resulted from Stanford's success but has unsettled the lives of many who live here and those who want to live here. I hope you ensure that Stanford's future plans will not make our current difficulties any worse and will actually begin to address the housing and transportation needs of the area. Stanford is located in a unique part of the world and you must ensure that this special place will not be diminished through thoughtless growth of a great university.

1

Sincerely,

Charlotte Epstein'

[REDACTED]

Palo Alto CA 94301

5.2.3.47 Responses to Comments from Charlotte Epstein

I-Epstein-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR Section 5.12 Population and Housing, and Section 5.15 Transportation and Traffic which addresses all Project and cumulative population, housing and transportation impacts associated with the construction and operation of the proposed Project, and mitigation that reduces significant impacts to the extent feasible.

Please also note that 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.

Comment Letter I-Essenmacher

From: [Kirsten Essenmacher](#)
To: [Rader, David](#)
Subject: Stanford GUP Application
Date: Friday, February 2, 2018 8:46:22 AM

February 1, 2018

County of Santa Clara

Department of Planning and Development

Attention: David Rader

I am writing in regards to the Draft EIR for the Stanford 2018 General Use Permit Application.

Under no circumstances should you approve this plan at this time. The traffic in our area is already horrendous, and this project will have a major additional impact on traffic. I would urge you to delay this project for a period of ten years, during which time Stanford, the surrounding cities and large companies in the area can develop a plan to drastically improve our public transportation system.

1

As someone who has lived in several large cities on the East Coast and Europe with comparable economic activity to Silicon Valley, but which have extensive bus and subway/train systems, I consider our public transportation system in this area to be primitive at best. Despite being a good north to south system with some future potential, Caltrain as it currently exists has significant limitations. For example, within the past year on a Saturday afternoon, I was in San Francisco attempting to get back to Palo Alto on Caltrain with my two young daughters. As I walked along the train, every car was packed to the gills with people. Finally, when I got to the last of six cars, which was also packed, I pushed my way onto the train up the stairs to the second level where we stood for almost an hour along with many other people who were standing and sitting in every available space. Tensions were high, and it was a very uncomfortable experience for riders. Trains run typically only once an hour on weekends, so it was quite a desperate situation for those of us trying to squeeze on the train to get home.

2

Another very problematic situation is the various intersections of Palo Alto city streets with the Caltrain tracks. At Churchill Ave., East Meadow Dr., and Charleston Rd., cars currently can back up for blocks trying to cross the tracks at various times of day and due to various local events. It can sometimes take 15-30 minutes just to get through these intersections. Another horrific problem is the congestion around the Embarcadero Rd. underpass, entrances to Palo Alto High School and Town and Country Village, and the El Camino intersection with Embarcadero Rd. Cars at these intersections are often barely moving and the one lane from West to East in the underpass is wholly inadequate for the current level of workers and residents of Stanford and surrounding areas. I shudder to think of what this area will be like when an additional 10,000 people are living/working in the area as projected under the 2018 Stanford GUP. The area around the University Ave. underpass is similarly congested and southbound cars on El Camino are often lined up for a great distance trying to turn left at Palm Drive.

3

A further concern is the traffic congestion in the Crescent Park neighborhood of Palo Alto. I no longer allow my children to bicycle on Hamilton Ave west of Center Dr. Often, cars are frantically speeding along Hamilton Ave. trying to bypass the congestion on University Ave. During commute hours, Center and E. Crescent Drives between Hamilton/Southwood and University Avenues. are packed with cars lined up and spewing exhaust trying to enter University Ave.

4

I am deeply concerned particularly about first responders trying to navigate the various crossings from east to west over or under the train tracks. A few years ago, I had to call 911 because of an unconscious family member. Every second counted as the ambulance sped her to Stanford Hospital, and thankfully she survived. However, I shudder to think of other families in similar situations with the current traffic situation, much less with the amount of traffic that will be generated with the buildings proposed in the 2018 GUP.

5

What is the maximum buildout of Stanford going to be? This needs to be determined and presented to the public sooner rather than later. Stanford should not be allowed to grow exponentially.

6

Thank you for your consideration.

Sincerely,

Kirsten Essenmacher, Ph.D.

Palo Alto, CA 94303

5.2.3.48 Responses to Comments from Kristen Essenmacher

- I-Essenmacher-1 The comment suggests not approving the Project, and delaying the Project for ten years. This comment does not address the adequacy of the Draft EIR.
- Due to the lack of specificity in the general comment that the Project will have a major additional impact on traffic, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics. Please also see specific responses to individual comments below.
- I-Essenmacher-2 This comment does not address the adequacy of the Draft EIR.
- Please, however, see Draft EIR, Section 5.15 Transportation and Traffic, which addresses all Project and cumulative effects on transportation, including public transit, associated with the construction and operation of the proposed Project.
- I-Essenmacher-3 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.
- I-Essenmacher-4 See Response to Comment I-Essenmacher-3, above.
- I-Essenmacher-5 Please refer to Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- I-Essenmacher-6 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comment Letter I-Eugenio

From: [Peter Eugenio](#)
To: [Rader, David](#)
Subject: Affordable Housing and Transportation
Date: Monday, January 29, 2018 5:14:55 PM

Dear David Rader, Mr.

I am a worker for Stanford Dining. The current draft EIR does not address Stanford's low wage workers who struggle to survive in the Bay Area housing market and commute from all over the Bay Area and hours to work. I believe with access to below market rate housing in the community, I will be able to contribute to the community I live in and help to reduce our carbon footprint.

1

Sincerely,

Peter Eugenio

San Lorenzo, CA 94580

5.2.3.49 Responses to Comments from Peter Eugenio

I-Eugenio-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

On June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed. Please also see Master Response 10: Affordable Housing.

Comment Letter I-Feuer

From: [Margaret Feuer](#)
To: [Rader, David](#)
Subject: Stanford's 2018 Permit Application
Date: Wednesday, January 31, 2018 1:14:39 PM

Dear Sir,

Stanford's 2018 General Use Permit Application and the Draft EIR will have significant and deleterious environmental effects by increasing traffic, necessitating new schools and increasing the jobs housing imbalance.

1

As a specific example, I live on [REDACTED] between Chaucer and Lincoln and can assure you that Stanford's policy of "no new net trips" is not working now. The addition of 2.275 million square feet of academic and academic support space and 3,150 new beds/units will further exacerbate the currently intolerable traffic in my Crescent Park neighborhood.

2

3

Despite Stanford's assertions, the afternoon commute period begins at 2:30pm and ends at 7 or 7:30. These trips reflect Stanford's work shifts. During this time, it is virtually impossible to exit or enter my driveway. It takes 15 to 20 minutes to go 1/4 of a mile from my house to 101. To go from Middlefield Road to 101 takes 1/2 hour to 45 minutes.

4

It is essential that the County Board tell Stanford that their DEIR is seriously flawed. More difficult but more essential will be telling Stanford that they need to lessen their square footage.

5

We count on you, our elected representatives, to protect the environment and the citizens of Santa Clara County.

6

Sincerely,
Margaret R. and Michael Feuer

[REDACTED]
Palo Alto, CA. 94301

5.2.3.50 Responses to Comments from Margaret and Michael Feuer

- I-Feuer-1 Due to the lack of specificity in the general comment that the Project will have a major additional impact on traffic, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, the Draft EIR, Section 5.13 Public Services, Section 5.12, Population and Housing, and Section 5.15 Transportation and Traffic address all Project and cumulative effects on public schools, population and housing and transportation associated with the construction and operation of the proposed Project. Please also see Response to Comment A-PV-3 for additional information on jobs/housing imbalance.
- I-Feuer-2 Please refer to 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 in the future, and Topic 8: Neighborhood Street Impacts for a discussion of how potential impacts to neighborhood streets, including those in Crescent Park, were addressed in the Draft EIR.
- I-Feuer-3 See Response to Comment I-Feuer-2.
- I-Feuer-4 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).
- I-Feuer-5 A general comment is made that the Draft EIR is flawed. 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.
- The comment also indicates Stanford should reduce its amount of development. Regarding a Reduced Project Alternative, please see Master Response 8: Alternatives.
- I-Feuer-6 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Finkelstein

From: [Diane](#)
To: [Rader, David](#)
Subject: Stanford 2018 GUP
Date: Friday, February 2, 2018 1:17:17 PM

Dear Mr. Rader,

As a resident since 1967 of College Terrace in Palo Alto, a small neighborhood surrounded on three sides by Stanford property, I can attest to the huge impact Stanford growth has had over the years.

1

In response to the latest GUP request, I have three comments.

First, Stanford has not yet finished all its construction allowed under the last GUP. Most notably, the huge expansion of the hospital and the new graduate student housing will affect traffic and other concerns not yet realized.

2

Second, Stanford has been buying up private housing in surrounding neighborhoods and removing this housing from the market for people without Stanford affiliation. Rentals do not even generate the payment of taxes since Stanford claims an exemption. In my small neighborhood alone there are at least 27 single family houses which are now Stanford property.

3

Third, Stanford is dodging a commitment to protect the property it owns in the foothills, a potential environmental disaster of its own.

4

Thank you for the County's consideration of these concerns.

Diane Finkelstein

Palo Alto CA 94306

Sent from my iPad

5.2.3.51 Responses to Comments from Diane Finkelstein

- I-Finkelstein-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- I-Finkelstein-2 For clarification, the Stanford University Medical Center (SUMC) expansion is located outside the Stanford General Use Permit area and is not part of either the 2000 or 2018 General Use Permit. 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 for additional detail.
- The Escondido Village (EV) Graduate Residences project is within the General Use Permit area and is authorized under the 2000 General Use Permit. The Draft EIR Project Description page 3-19 acknowledges the EV Graduate Residences are currently under construction, and that this housing is not expected to be completed and occupied until approximately 2020. Please see Master Response 6: Approach for 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 1: Approach for 2018 Baseline Environmental Setting, and Topic 2: Approach for Cumulative Scenario for additional detail.
- I-Finkelstein-3 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 for additional detail.
- I-Finkelstein-4 Please see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

Comment Letter I-Flexer

From: [Reine Flexer](#)
To: [Rader, David](#)
Subject: Stanford growth
Date: Saturday, February 3, 2018 9:29:06 AM

Hello,
this is to register my opinion that Stanford is trying to grow too much and the impact to Palo Alto and Menlo Park will negatively affect the area in term of traffic, parking and housing. [1

Already now people employed by Stanford have a very hard time finding affordable rents and in many cases my friends have to move over and over into smaller and more expensive units. Stanford should help their current employees before adding to the load. [2

Please try to put a break to this expansion, [3
Thank you,
Regards,

Reine Flexer [REDACTED] Palo Alto.

5.2.3.52 Responses to Comments from Reine Flexer

- I-Flexer-1 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, however, see Draft EIR, Sections 5.12 Population and Housing, and 5.15 Transportation and Traffic, which address all Project and contribution to cumulative effects on population and housing, and traffic, associated with the construction and operation of the proposed Project.
- I-Flexer-2 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 10: Affordable Housing.
- I-Flexer-3 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Flynn-Do

From: [Meiko Flynn-Do](#)
To: [Rader, David](#)
Subject: Stanford: Provide affordable Housing and Transportation
Date: Monday, January 29, 2018 7:03:27 PM

Dear David Rader, Mr.

Stanford often speaks of itself in grand gestures and impressive statistics, but the fact that they are planning on building 0 units of affordable housing for postdocs, staff, or other workers is not a stat they are trying to promote. As a Stanford student, it matters to me that the staff who work here have access to affordable housing and I ask you to consider their lives over Stanford's ego. Thank you for your time.

1

Sincerely,

Meiko Flynn-Do

[REDACTED]
San Jose, CA 95116

[REDACTED]

5.2.3.53 Responses to Comments from Meiko Flynn-Do

I-Flynn-Do-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed. Please also see Master Response 10: Affordable Housing.

Comment Letter I-Franich

From: [Nancy Franich](#)
To: [Rader, David](#)
Subject: Stanford General Use Permit Application.
Date: Friday, January 26, 2018 3:37:25 PM

I support accepting Stanford's General Use Permit Application.

I 1

I live in Los Altos and have two sons who graduated from Stanford. I strongly support building more housing on campus. Both sons lived four years on campus, one as an undergrad, the other as a grad student. They essentially did not need a car unless they were leaving campus to shop or on a rare trip home. Most of their activities were on campus. Had housing not been available, they would have driven the round trip from Los Altos to Stanford once or twice each day adding unneeded cars to the road. Housing every student on campus reduces traffic.

I 2

Nancy Franich
[REDACTED]
Los Altos, CA 94024

5.2.3.54 Responses to Comments from Nancy Franich

I-Franich-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Franich-2 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

1/31/2018

Dear David Greder,

Please include this opinion in the official record of the Stanford GVP hearings. It is from the Daily News of last week, January 26, 2018. A major no approval or build out at this time.

Thank you,
John Karl Fredrich

LETTERS TO THE EDITOR

Stanford expansion

Thank you for the update article on Stanford's latest expansion efforts. There seems to be little incentive for approval of any further build-out until the impacts of the present general use permit are absorbed and analyzed and deficiencies over unsuccessful mitigations from that work are assessed, especially those related to water and air and quality of life issues.

It is clear from what has transpired thus far that even as the latest 2 million-plus square foot enhancement is touted, the development work for yet another 2 million must already be in the works. Without greater attention to the cumulative results, and EPA and CEQA demands for environmental safeguards, Stanford will seek to expand right out to Interstate 280, salamanders and other critters be damned.

It appears that the business end of operations needs to work in closer consultation

with academic ones, particularly the schools of law, medicine and arts and sciences. People, and their heedless actions, are the planet's biggest problem, and all of the university's work should be focused on that rather than more billion-dollar build-outs that exacerbate California's water stress crisis. Of central concern is the paramount need to monitor and reduce deleterious effects; Stanford University's new requests in regard to real estate development insufficiently address that imperative.

John Karl Fredrich
Palo Alto

2018 FEB -5 PM 2:24
MAIL ROOM

150 THE DAILY NEWS 13

HOW TO WRITE US

Letters require the author's first and last name, home street address and phone number. (The phone number and address are used for verification, not publication.)

Letters of more than 250 words aren't considered. Email letters to dletters@bayareanewsgroup.com. Mail them to 255 Constitution Drive, Menlo Park CA 94025.

5.2.3.55 Responses to Comments from John Fredrich

- I-Fredrich-1 The comment references a January 26, 2018 letter to the editor of the Daily News. Please see Response to Comment I-Fredrich-2.
- I-Fredrich-2 The comment expresses concern that the proposed Project should not be approved until the impacts of the existing general use permit are analyzed, and deficiencies with unsuccessful mitigation from it, including air quality and quality of life issues are assessed. This comment does not address the proposed 2018 General Use Permit or the adequacy of the Draft EIR. However, all Project and cumulative environmental impacts associated with implementation of the 2000 General Use Permit were analyzed and mitigated to the extent feasible in the Final EIR prepared for that Project.¹⁷ A Mitigation Monitoring and Reporting Program ensured all adopted mitigation measures in that Final EIR were implemented.

The comment also claims Stanford seeks to expand to I-280, and alludes to effects on salamanders and other wildlife. Please see the Draft Project Description which discusses that no academic or academic support or housing development is proposed in the Foothills Development District under the 2018 General Use Permit. Please also see Draft EIR, Sections 5.3 Biological Resources, which address all Project and contribution to cumulative effects on wildlife and plant life associated with the construction and operation of the proposed Project.

The comment references exacerbation of the water crisis in the state. Please see Draft EIR, Sections 5.9 Hydrology and Water Quality, and Section 5.16 Utilities and Service Systems, which address all Project and contribution to cumulative effects on hydrology, water quality and water demand associated with the construction and operation of the proposed Project.

¹⁷ Stanford University Draft Community Plan and General Use Permit Application Final EIR, December 18, 2000.

Comment Letter I-Frizzell

From: [Julianne Frizzell](#)
To: [Rader, David](#)
Subject: stanford GUP
Date: Tuesday, October 24, 2017 4:35:14 PM

County of Santa Clara

Department of Planning and Development

Attention: David Rader

County Government Center

70 West Hedding Street, San Jose, CA 95110

Phone: (408) 299-5779

Email: David Rader

For the County of Santa Clara Supervisors,

I am unable to attend the Stanford GUP meetings, however I am interested in the results! I have lived in the Palo Alto area since the early 1970's - first on the other side of the creek in Menlo Park, and for the last 21 years in Palo Alto. I am concerned with what appears to me to be massive growth "without end" on the Stanford campus.

I 1

I concur with Peter Drekmeier's points which I quote and list below.

"Here are the things I would like to see incorporated in the GUP.

1) Maximum build-out plan.

I 2

2) Permanent protection of the foothills through a transfer of development rights from west of Junipero Serra to the core campus.

I 3

3) Creation of at least as many housing units as increase in campus daytime population.

I 4

4) Greater Transportation Demand Management measures."

I 5

Thank you

Julianne Adams Frizzell

[REDACTED]



5.2.3.56 Responses to Comments from Julianne Frizzel

- I-Frizzel-1 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, however, see Draft EIR, Sections 5.12 Population and Housing which addresses all Project and contribution to cumulative effects on growth associated with the construction and operation of the proposed Project.
- I-Frizzel-2 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Frizzel-3 Regarding the comment that the Project should extend protections of the foothills through a transfer of development rights; this comment does not address the adequacy of the Draft EIR. Please also see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.
- I-Frizzel-4 Please note that on June 12, 2018, the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.
- I-Frizzel-5 Refer to Response to Comment I-Drekmeier-10.

From: [Patti L Fry](#)
To: [Rader, David](#)
Subject: Comments on Stanford GUP DEIR
Date: Friday, February 2, 2018 12:26:13 PM

To Santa Clara County c/o David Rader:

Please accept these comments on the Stanford 2018 GUP DEIR.

As a Menlo Park neighbor and alumna, I heartily applaud and support Stanford University's academic mission, accomplishments, and value to the intellectual/cultural vitality of the mid-peninsula community in the past and its promising future. Nevertheless, I have concerns that the 2018 General Use Permit ("GUP") DEIR does not adequately evaluate the potential environmental impacts of Stanford's proposed growth on campus. It also omits some important mitigation measures to eliminate or mitigate the impacts. The health of our communities and the viability of Stanford's proposed growth are at stake.

1

Following are some issues that must be addressed:

PROJECT DEFINITION - needs to include updated SCP. Sphere of influence needs defined and evaluated.

Unlike the 2000 GUP EIR, this DEIR evaluates only the proposed 2018 GUP at the Stanford campus, not also the Stanford Community Plan ("SCP").

Not only should the SCP be evaluated in the DEIR, it should first be updated to reflect the realities of Stanford's expansion of academic and academic support facilities beyond the campus and in the mid-peninsula area.

The primary reason for expanding the evaluation is to analyze the off-campus growth of academic and academic-supporting uses in nearby communities that may be related to, or triggered by, on-campus growth. A clear example is the new campus under construction in Redwood City that is not even listed as a project in the current or cumulative scenarios (and should be listed). It is commonly known in our community that academic support staff who formerly worked on campus now work off-campus and that some will be moving to the new Redwood City campus. The DEIR must be clear whether campus growth under the 2000 GUP has triggered the need for off-campus growth like this campus and essentially exported campus-growth trips out of Santa Clara County to San Mateo County where these are not currently counted towards "net new commute trips" or linked to the need for new housing.

2

The new Redwood City campus primarily will house academic-support functions, some of which currently are housed at Stanford and some are housed at a variety of off-campus sites after being moved from campus since 2000. It is unclear whether the ratio of total staffing for academic and academic-support functions has changed over time because the DEIR only describes on-campus personnel. It appears that the physical locations for some of these functions have changed to be off-campus since 2000. Perhaps also the original on-campus space has been backfilled with new personnel. These changes in turn have changed the type and location of potential impacts such as traffic impacts. The total sphere of influence growth and its impacts must be identified in the DEIR along with appropriate mitigation measures for adverse impacts of this growth.

Further, the DEIR needs to identify what off-campus growth has accompanied, and been

triggered by, the on-campus growth (the latter described as an average of 200,000 SF/year) by type and location in order to evaluate DEIR conclusions related to the impacts of future on-campus growth. The DEIR seems to assume that future growth will not trigger or be accompanied by related off-campus growth. The DEIR must evaluate the current situation across jurisdictions, make a determination of the project-specific impacts on current and cumulative conditions not only on campus but also in a defined broader mid-peninsula sphere of influence. As part of that analysis, the DEIR needs to identify the project's sphere of influence. The sphere of influence should be similar to the current Trip Reduction Credits area and also extend to, and include, Woodside Rd. so that the Redwood City campus is included.

2
cont.

Concerns have been raised recently that project approval requests and their environmental reviews have been done in a piecemeal manner rather than a single whole as CEQA requires (e.g., the [500 El Camino Real](#) project and the Sand Hill Road annexation project and Use Permit request in Menlo Park, and the Quarry Rd project on campus each seeking separate approval within a short time along with the GUP). A thorough analysis of current and future academic and academic-supporting uses and locations beyond campus under this DEIR would help alleviate such concerns in the future. Additionally, it could serve to confirm DEIR assumptions and to address community concerns about impacts.

The DEIR should be modified and recirculated after the SCP is revised and included in the Project that the DEIR evaluates.

2018 BASELINE AND CUMULATIVE CONDITIONS - needs to include Stanford growth off-campus

The DEIR is unclear what projects are included in the Baseline and in the Cumulative conditions. A number of projects are under construction, approved, or reasonably foreseeable in the mid-peninsula. The DEIR should include a list of all such projects, size, location, uses. As noted above, the vast new Stanford campus (approximately 1.5 million SF) under construction in Redwood City is notably absent. This was known or reasonably foreseeable when this DEIR was in preparation.

Because massive projects are underway, and some Stanford academic and academic-support functions may be located in temporary sites, it is important to inventory all such sites and identify the current and future location of these uses and staff. That will make more clear what baseline and future conditions should be evaluated on- and off-campus that could relate to on-campus building replacement or net new growth under the 2018 GUP and in the larger sphere of influence.

3

Note that the definition of “academic support uses” explicitly includes “teaching hospital facilities” as well as housing designated for University and Hospital personnel (as adopted by Santa Clara County Planning Commission 9/6/01).

A new SCP and modified DEIR provide an opportunity for Stanford University to establish a clear picture of its future growth and the potential impacts on surrounding communities, and to demonstrate its commitment to minimize adverse impacts as a good community member and neighbor.

GROWTH ASSUMPTIONS - needs clear location-specific and maximum allowable development assumptions

4

The DEIR is unclear about specific growth that is assumed part of the Project. A program-level EIR under CEQA should make such assumptions. For effective measures to be identified to eliminate or mitigate impacts, and to evaluate specific future projects under the 2018 GUP, the DEIR should list by campus sub-location (and off-campus site as appropriate) the assumed specific uses (e.g., academic, academic-support, childcare) and amount (e.g., SF, housing units). The campus area is very large and shifts of uses from one sub-area to another could cause major shifts in impacts. A recent example is the proposed Quarry Road project that formerly was assumed to be located near the south end of campus. Its traffic impacts could be greatly different when located toward the north end of campus.

4
cont.

The Maximum Allowable Development by use category also should be specified so that the DEIR's conclusions can be evaluated in that context.

POPULATION/HOUSING - needs housing linkage information in sphere of influence

The bay area, and mid-peninsula area in particular, are suffering from a severe jobs/housing imbalance. The DEIR is unclear about how Stanford's on-campus and off-campus growth since 2000 has adhered to the housing linkage ratios shown in the document. Although the DEIR states that some housing has been provided in other communities, this is not identified by location or quantity, and could have been deemed essential to offset new housing demand from non-academic development so that such housing cannot be double counted as a credit towards alleviating new housing demand from campus or off-campus academic-related growth. The huge new Redwood City campus added no new housing units. The 2000 GUP seemed to assume that all such growth would occur on campus. The DEIR should explain how off-campus academic, academic-support, and non-academic growth has been affecting housing demand in the sphere of influence since 2000.

5

The DEIR should address the potential propensity of future on-campus growth to worsen the jobs/housing ratio in a defined sphere of influence so that mitigation measures could be identified. Since the impacts may be outside of Santa Clara County, any impact fees provided to the County should be specifically designated for affected jurisdictions.

TRAFFIC/TRANSPORTATION - needs updated trip monitoring and enforcement plan, and additional monitoring sites in sphere of influence

With regional growth and increased traffic congestion, the current "no net new commute traffic" policies need to be revisited so that these continue to be effective as mitigation measures. Changes should be made to the proposed Mitigation Measures for Impact 5-15.2 under the 2018 GUP and updated SCP.

Specifically, mitigation should be based on measurements of both daily traffic and traffic at defined peak periods (these hours have broadened in recent years) rather than at only one peak hour inbound and outbound. The measurements should be of traffic both to/from campus at all peak periods and for the day, and taken either daily or weekly rather than only twice annually. Impact fines should be assessed much more frequently than after a second annual violation out of three years so that violations can not persist for months or even years, as under the current method. There should be no limit to measuring staff trips of only those staff working at least 20 hours per week on campus. Apparently there are not plans for shuttle service between Redwood City campus and Sanford campus, so staff attending meetings will need to drive or find alternate ways to travel between the two sites. These trips should be counted in daily totals and in peak period totals.

6

Continued growth in total daily traffic, including off-peak, must be evaluated in the DEIR.	7
This evaluation is essential to include also in other DEIR sections such as Air Quality, Noise, and Greenhouse Gas Emissions because total daily trips affect those impacts.	8
Mitigation measures should be based on a standard that measures “net new” trips at gateways without trip reduction credits. No new trips means no new trips. Measuring only actual trips means that potentially effective TDM steps to promote alternative commute modes will be measured when they result in fewer trips rather than as trip reduction credits even if they do not work. This simpler measurement method may necessitate an upfront step to reset what constitutes the baseline 2000 trips without credits.	9
With an updated SCP included in the DEIR, and an analysis of sphere of influence impacts, additional gateways should be identified so that this revised strategy/policy exists throughout the sphere of influence at sites where Stanford can implement its TDM programs. Gateways to the hospitals also should be included, making the measurement process much more straightforward and simple. The technologies described in the DEIR should make all these measurements easily possible.	10
The DEIR should be clear whether expanded child care facilities would be limited to on-campus students and personnel. If not, the DEIR should make clear its assumptions about net new trips resulting from those who would not live or work on campus but come to campus for childcare dropoff/pickup, usually during peak periods. These, and the above, changes need to be incorporated into an updated SCP in addition to the DEIR.	11
The DEIR asserts that neighborhood cut-through traffic (e.g., in Allied Arts, Willows neighborhoods in Menlo Park) would not increase. It should show how this conclusion was reached. As an example, in 2000 Sand Hill Road did not connect to El Camino Real, and traffic stymied by the current lack of linkage across El Camino to/from Alma with Sand Hill Rd did not head north on El Camino to make u-turns at Cambridge Ave. in Menlo Park as they now do. This current practice lengthens traffic queues and results in spill-back and neighborhood cut-through. It does not appear to have been analyzed. Neighborhood cut-through traffic has become an issue in the Willows; the DEIR should be clear about how it arrived at the conclusion of no significant impact.	12
<i>Technical points: the DEIR fails to explain how adding the 1,480 remaining unbuilt parking spaces under the 2000 GUP plus a “parking reserve” of 2,000 net new spaces - a total potential addition of 3,480 spaces beyond current conditions - would have no impact on trips and traffic congestion. Also, page 3-16 shows a reduction in parking but page 3-17 shows an increase. Page 3-18 says unbuilt parking is 3,156.</i>	13
NOP COMMENTS	
On page 1-7, the DEIR implies that section 5.0.2 addresses concerns raised during the Notice of Preparation comment period. They are not discussed explicitly there and should be.	14
POLICY ISSUES - encourage multi-directional planning, campus housing, protection of the foothills	
As described above, the SCP needs updated to reflect Stanford’s expansion and growth beyond campus and to incorporate an improved, more meaningful, and simpler trip measurement mechanism. The Strategies in the SCP should be updated to include additional jurisdictions, including Menlo Park.	15

Comment Letter I-Fry

An updated SCP also should include a new multi-jurisdictional Land Use Policy Agreement that includes at least the City of Menlo Park and San Mateo County, in addition to Santa Clara County, City of Palo Alto, and Stanford, and possibly adding additional cities such as East Palo Alto and Redwood City. This could be evaluated as part of the Project or as a required mitigation measure before new development can begin under the 2018 GUP.

15
cont.

Availability of housing will be essential to support Stanford's growth. Consider approving tranches of growth, each of which is supported by new housing. For continued reduction of traffic and other impacts, even more new housing should be added to both the main and Redwood City campuses.

16

The SCP and GUP should reaffirm, and extend, protections of the Academic Growth Boundary, open space, and foothills.

17

CLOSING

I wish Stanford well in its growth plans and hope that these comments will help identify areas that still need addressed so the requested growth will prosper with the least possible impact on the very communities where most of Stanford's personnel and students (and a large number of alumni and donors) live. This means explicitly analyzing off-campus growth in the University's sphere of influence that is related to on-campus growth, and identifying appropriate mitigation measures at a broader community level.

18

Respectfully submitted,

Patti Fry, Menlo Park resident and former Menlo Park Planning Commissioner

Sent from my iPad with apologies for typos

5.2.3.57 Responses to Comments from Patti Fry

I-Fry-1 Due to the lack of specificity in the general comment about impacts of Project growth, omission of mitigation measures, and the health of the communities, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics. Please also see specific responses to individual comments below.

I-Fry-2 The Draft EIR evaluates the proposed Project, which includes revisions to the Stanford Community Plan to change the land use designations that apply to the Stanford driving range and some existing faculty residences. As discussed in the Draft EIR Section 5.10 Land Use and Planning, Impact 5.10-1, the proposed revisions to the Stanford Community Plan reflect, and are consistent with, the existing land uses on these sites, as well as proposed additional development in these areas under the Project. The proposed Project does not propose amending any of the strategies and policies of the Stanford Community Plan. However, these are County policy decisions that the County Board of Supervisors may consider.

A number of non-Project, off-site projects are indicated in the comment, including the Stanford in Redwood City campus, 500 El Camino Real, Sand Hill Road annexation, and Use Permit request in Menlo Park. With respect to how the Draft EIR treats non-Project, off-site developments projects in either the baseline or cumulative context, 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. With respect to the “Quarry Road project on campus” indicated in the comment (presumably referring to the Center for Academic Medicine), this development is located within the General Use Permit boundary, and included in the 2018 environmental baseline.

The trip reduction credit area does not include Redwood City, as 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 2018 General Use Permit 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.¹⁸ It is reasonable to establish

¹⁸ 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.

the boundary for receiving credits toward the no net new commute trips standard based on the area in which significant impacts otherwise would occur. The proposed 2018 General Use Permit would not result in significant impacts at Woodside Road in Redwood City. 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.

With the respect to the request for the Draft EIR to be recirculated, please see Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation.

I-Fry-3 Please 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.

The comment also indicates the definition of “academic support uses” explicitly includes “teaching hospital facilities as well as housing designated for University and Hospital personnel.” The Stanford Community Plan in SCP-LU-1 and SCP-LU-2, outlines the allowable academic and academic support uses. As described in Draft EIR Appendix BCR (page 4.28), the Santa Clara County Planning Commission created an interpretation of “academic support use” in 2001. Academic support uses include nonacademic uses essential to the daily operation of the University. SCP-LU-2, states that allowable academic uses include instruction and research (including teaching hospital facilities). The School of Medicine, which is located on the Stanford campus is a research-intensive institution that emphasizes medical innovation, novel methods, discoveries, and interventions in its integrated curriculum. It is the primary teaching facility of the Stanford University Medical Center. As such, hospital teaching facilities are located on the campus in close proximity of both Stanford Health Care and Lucile Packard Children's Hospital. The analysis of the proposed 2018 General Use Permit includes the impacts of construction of all academic facilities on the campus land in unincorporated Santa Clara County, including facilities used by the School of Medicine.

The expansion of hospital and School of Medicine facilities outside unincorporated Santa Clara County, in Palo Alto, is not part of the proposed 2018 General Use Permit. That project was reviewed and approved by the City of Palo Alto in 2011. The existing hospital and School of Medicine facilities in Palo Alto are included in the 2018 General Use Permit Draft EIR’s baseline conditions. Future expanded facilities approved by Palo Alto are included in the 2018 General Use Permit Draft EIR’s cumulative conditions.

The issues raised in this comment do not warrant any modifications to the Stanford Community Plan or the Draft EIR.

I-Fry-4 As discussed in Chapter 3, Project Description, page 3-18, the Draft EIR acknowledges that no site-specific projects and locations have been identified for development under the proposed 2018 General Use Permit. As is appropriate for a Program EIR, the Draft EIR considered the maximum square footage of academic and academic support development, maximum number of housing units, and maximum projected population under the proposed 2018 General Use Permit to conservatively evaluate all potential environmental impacts associated with implementation of the proposed Project. Please also 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.

Please also see Response to Comment A-PA-18 for information about the process the County uses to evaluate re-distribution of square footage and housing units/beds from one Development District to another.

I-Fry-5 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Housing Linkage Ratio and Timing.

I-Fry-6 The process for measuring the cordon traffic was developed in 2001. The process involves eight weeks of all-day counts at all campus gateways, with methodical screening of cut-through trips, and calibration to account for medical center travel. The number of weeks and time of year that the cordon counts occur represent a time period when Stanford is in session and when daylight is such that observation can be made at the gateways. The methodology includes all traffic at the campus gateways and does not discount for part-time employment status. The methodology also would not discount trips originating or destined for Stanford's Redwood City campus, if such trips were to occur.

As illustrated in the annual traffic monitoring reports, Stanford has met the no net new commute trips standard every year under the 2000 General Use Permit. The standard is measured by considering both the trips crossing the campus cordon and trip reductions that occur outside the campus boundary.

The 2000 General Use Permit defined how the no net new commute trips standard was to be measured. This involved counting vehicles all-day at all entry points to the academic campus to determine the hour with the highest amount of inbound traffic in the morning and the highest amount of outbound traffic in the afternoon. These volumes then set the baseline number of trips. Each year, Santa Clara County takes new all-day counts at the same entry points to the academic campus. By using the same methodology each year, it is possible to conduct an apples-to-apples comparison. If the time periods were changed, it would not be possible to compare to the baseline counts.

The trip goal is not achieved if subsequent 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. The 1 percent factor accounts for a reasonable margin of error. In addition, use of a two-out-of-three-year period for measuring an exceedance provides Stanford an opportunity to take steps to reduce trips below the baseline. The mitigation measure is designed to incentivize and encourage trip reduction. The two-out-of-three-year period is reasonable given the level of effort and time that is required to implement successful trip reduction programs.

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 for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).

I-Fry-7 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for detail on how regional traffic growth was evaluated in the Draft EIR.

I-Fry-8 Consistent with accepted professional practice, the air quality and greenhouse gas analyses in Sections 5.2 and 5.7 of the Draft EIR, respectively, 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. With respect to traffic noise, Section 5.11 in the Draft EIR uses the peak-hour contribution of Stanford traffic in assessing Project the effects to baseline conditions and contribution to cumulative conditions.

Please see Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading.

I-Fry-9

The counts taken at the campus gateways do not include trip reduction credits. The counts measure the number of vehicles crossing the cordon. Trip reduction credits constitute actual trips removed from local streets outside the campus boundary. Trip reduction credits are monitored separate from the cordon measurements, pursuant to a methodology approved by the County Planning Office.

Mitigation Measure 5.15-2(5), on page 5.15-88 of the Draft EIR, references Stanford Community Plan Policy C-8 which establishes a policy to credit 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. Mitigation Measure 5.15-2 states that Stanford will receive credit commensurate with the actual number of trips reduced outside the cordon due to Stanford's efforts and the proportion of the cost of the program that Stanford is contributing. 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.

I-Fry-10

As stated on Introduction, page i of the Stanford Community Plan, only the unincorporated lands of Stanford within Santa Clara County are subject to the land use jurisdiction and regulatory authority of the County. The Community Plan and General Use Permit do not govern the land uses in other jurisdictions such as Palo Alto. Palo Alto uses a different methodology to regulate trips to the hospital.

Mitigation measures in an EIR must be designed to avoid or reduce the impacts of the proposed Project. The proposed Project does not include development outside of unincorporated Santa Clara County; therefore, the mitigation measures in the EIR focus on monitoring at the campus boundary.

I-Fry-11

Stanford indicates childcare enrollment priority is given to faculty, clinician educators, students and postdocs, university staff, employees of Stanford Health Care and Stanford Children's Health, respectively, who are largely on- or near- campus populations.¹⁹

Regardless, the Draft EIR Section 5.15 Transportation and Traffic pages 5.15-64 to 5.15-67 provides detail on how Project trip generation was developed for

¹⁹ See <https://cardinalatwork.stanford.edu/benefits-rewards/worklife/children-family/on-site-child-care>.

proposed academic support space, which would include childcare space, that would be developed under 2018 General Use Permit.

The issues raised in this comment do not warrant any modifications to the Stanford Community Plan or the Draft EIR.

I-Fry-12 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods.

I-Fry-13 As outlined in the Project Description (p. 3-18) and in Section 5.15-8 of the Draft EIR (p. 5.5-171), Stanford has proposed to stay within the parking allocation granted under the 2000 General Use Permit. As proposed by Stanford, the parking reserve would only be considered under one of three circumstances:

- Stanford is achieving the no net new commute trips standard;
- The proposed additional parking spaces serve a purpose that is not likely to result in a substantial increase in peak hour commute trips (such as visitor and/or residential demand); or
- Unforeseen circumstances occur due to changes in background conditions such as prolonged or permanent disruption of transit service that requires provision of additional parking.

Under the first two circumstances, Stanford would be adhering to the no net new commute trips standard and an increase in peak hour vehicular trips would not occur. The third circumstance, which relates to unforeseen circumstances such as a disruption of transit service cannot be evaluated in this EIR because the circumstances under which it would occur are not known at this time.

The comment suggests that the parking reserve is in direct contradiction to Stanford meeting the no net new commute trips standard and that Stanford would not need the additional parking unless it was pushing vehicles outside the peak hour. As described Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading, monitoring data show that Stanford has not pushed commuters to off-peak hours. Further, the Community Plan acknowledges that although the cordon methodology is focused on commute trip reduction, options for those without cars are needed at non-commute times as well to make it possible for individuals to function throughout the day without their cars.

An increase in on campus parking supply would not necessarily prevent achievement of the no net new commute trips standard. Some parking on the Stanford campus is not directly associated with peak period traffic congestion. For example, parking near campus residential areas often is used to store cars

onsite when they are not in use. Visitor and event parking areas often are occupied during off-peak periods.

It also is important to recognize that the Draft EIR identifies the reasonable worst-case impacts from the Project by conservatively assuming the no net new commute standard is not achieved. The analysis is based upon the rates of trip generation from campus academic and residential land uses, without constraining trip generation by assuming restrictions on available parking supply. By performing the analysis in this manner, all foreseeable trips to and from the campus are analyzed, regardless of the amount of parking that is provided on the campus.

The decrease in overall parking under the 2000 General Use Permit shown in Draft EIR Table 3-4 recognizes that as projects are demolished and reconstructed, redevelopment often involves the removal of parking spaces associated with those individual projects. Table 3-4 documents what was on the ground in 2015. Draft EIR Table 3-5 includes all approved and pending projects that would be constructed under the 2000 General Use Permit, including parking.

Please see Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for additional information.

- I-Fry-14 All responses to the Notice of Preparation (NOP), included in the Draft EIR Appendix NOP Responses, were reviewed by the County for relevancy to the proposed Project prior to preparation of the Draft EIR. Any substantive responses to the NOP that merited consideration in the Draft EIR are reflected in the Draft EIR analyses as applicable. CEQA does not require EIRs to include a discussion on how NOP responses are addressed.
- I-Fry-15 Regarding the request for the Stanford Community Plan to be updated to reflect any Stanford expansion or growth beyond the campus, please refer to Response to Comment I-Fry-2, above.
- The issues raised in this comment do not warrant any modifications to the Stanford Community Plan or the Draft EIR.
- I-Fry-16 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing.
- I-Fry-17 Please see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.
- I-Fry-18 This comment summarizes previous comments made in this comment letter; please refer to the individual responses to those comments above.

Comment Letter I-Gallagher

From: [Mary Gallagher](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Friday, February 2, 2018 4:57:43 PM

Stanford must:

- Establish maximum build out. Stanford was required to do this in 2000 and never complied. I 1
- Provide schools on campus for children of SU families residing on campus. I 2
- Build new housing on campus property near transit centers. I 3
- Slow down on density. I 4
- Mitigate traffic issues and problems that will result from new SU medical center employees, additional students, faculty and staff. I 5
- Preserve foothills - forever. I 6
- Not make regional traffic worse. Gridlock is already becoming too frequent in Palo Alto neighborhoods. Stanford's traffic reports need serious rewrites and revaluation. I 7
- Be required to adopt a policy of carbon neutrality for all new construction. I 8

Sincerely,
Mary Gallagher

5.2.3.58 Responses to Comments from Mary Gallagher

- I-Gallagher-1 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Gallagher-2 Please refer to Section 5.13 Public Services in the Draft EIR, which addresses all Project and contribution to cumulative impacts on public schools associated with the construction and operation of the proposed Project. Please also see Master Response 12: Public Schools, Topic 2: Additional School Site.
- I-Gallagher-3 Please see Master Response 10: Affordable Housing for information about the use and distribution of affordable housing funds.
- I-Gallagher-4 A general comment is made to slow down on density. These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Gallagher-5 The Draft EIR addresses the impacts of development on the Stanford University campus, not the impacts of development at the Stanford University Medical Center (SUMC) or at other off-campus sites. Please refer to 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.
- I-Gallagher-6 Regarding the comment to preserve the foothills forever; this comment does not address the adequacy of the Draft EIR. Please also see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.
- I-Gallagher-7 The comment does not provide any substantial evidence that any of the assumptions or methodologies used in the determination of traffic impacts in the Draft EIR were flawed. Please refer to Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for detail on how regional traffic growth was evaluated in the Draft EIR.
- I-Gallagher-8 Please refer to Response to Comment I-Drekmeier-15 regarding the significance criteria used to judge the Project contribution to GHG emissions, and the conclusions that these impacts would be less than significant. Whether the County should require Stanford to achieve carbon neutrality for all new construction is a policy matter for the County Board of Supervisors to consider.

1999

Full Name / Nombre Completo:

Date / Fecha:

1/28/01

soy miembro de la comunidad

1

This image shows a single page of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Comment Letter I-Garcia

I-Garcia

Spanish to English translation of letter:

I am a member of the community.

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuándo determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
- ☒ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
- ☒ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

28 1/18

5.2.3.59 Responses to Comments from Jesus Garcia

I-Garcia-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Garcia-2 Please refer to Response to Comment O-SCOPE-15.

I-Garcia-3 Please refer to Response to Comment O-SCOPE-10.

I-Garcia-4 Please refer to Response to Comment O-SCOPE-3.

I-Garcia-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. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and on September 25, 2018 the Board of Supervisors adopted an impact fee (of \$68.50 effective July 1, 2020) for any Stanford academic development.²⁰

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

I-Garcia-6 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

²⁰ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Comment Letter I-Gardner

From: [Nate Gardner](#)
To: [Rader, David](#)
Subject: Please compel Stanford to build a park & ride close to 280
Date: Tuesday, October 10, 2017 3:18:09 PM

The Stanford Shopping Center expansion, the Sand Hill road diet along with the northern/western medical center and campus expansion have significantly contributed to traffic volume. Sand Hill, Alpine and Palo Alto roads are overwhelmed now!

1

Stanford does a great job with it's shuttles and if they were required to build a parking garage right next to 280, it could take a significant number of single car trips off the road. If parking were free at these park & rides, many would use them.

2

Why in the EIR are hospital visits removed from the count? This seems very unfair to the community when medical visits are such a huge contributor to traffic volume.

3

Regards,
Nate

5.2.3.60 Responses to Comments from Nate Gardner

- I-Gardner-1 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.
- I-Gardner-2 This comment does not address the proposed Project or the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- I-Gardner-3 Stanford University Medical Center (SUMC) and other Stanford facilities located outside the boundaries of the proposed 2018 General Use Permit are not included in the no net new commute trip count data. Please refer to 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, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary.

Comment Letter I-Godiner

Full Name / Nombre Completo: JAVIER GODINER Date / Fecha: 1/28/18

Email Address (optional) / Correo Electrónico (opcional):

123

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

LA IMPORTANCIA QUE TENEMOS
EN ESTA JUNTA QUE TODOS ADECUADO
Y LIDER DE BUENA AYUDAN ES VIERA
BRASIDO, QUIERQUE PONGAN TODO LO DE
SOPORTE. ES VIERA VENIDO Y YO
ESTOY, DE ADECUADO CUENTEN CON MI
TODOS QUE DE ALGUNA MANERA.
PODAMOS CONTAR CON MI GO

GRACIAS POR TODO SU APOYO

Javier Godiner

I-Godiner

Spanish to English translation of letter:

The importance that we give to this coalition that is adequate and the leader that helps us is good. Bravido(?) wants them to put all their support behind it. It is welcome and I am in agreement. All of us – who, somehow or other, can count on me. Thanks for all your support.

Comment Letter I-Godiner

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
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Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

1/28/18
June Godiner

5.2.3.61 Responses to Comments from Javier Godiner

I-Godiner-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Godiner-2 Please refer to Response to Comment O-SCOPE-15.

I-Godiner-3 Please refer to Response to Comment O-SCOPE-10.

I-Godiner-4 Please refer to Response to Comment O-SCOPE-3.

I-Godiner-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. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and on September 25, 2018 adopted of an impact fee (of \$68.50 effective July 1, 2020) for any Stanford academic development.²¹

I-Godiner-6 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

²¹ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Comment Letter I-Goldstein

From: [Paul B Goldstein](#)
To: [Rader, David](#)
Subject: Comments on the Draft EIR for Stanford GUP
Date: Friday, February 2, 2018 4:53:19 PM

Here are my comments on the Draft EIR for Stanford's GUP,

I support the comments made by the City of Palo Alto. I am particularly concerned with the following:

1) The increased traffic generated by the proposed build out. The "no net increase" concept needs to be applied to a larger window than the current methodology. The peak commute hour is lengthening. Traffic increase all day long is a problem that must be mitigated. In addition to commute traffic, the Stanford buildout will generate traffic all day. This is currently having a negative effect on our quality of life, and will only get worse.

1

In addition to limiting the number of trips, Stanford should be required to contribute to the cost of mitigating the unavoidable traffic increase. This could be in contributions to transportation infrastructure including enhancements to rail services, construction of grade separations, contributions to bicycle infrastructure, etc.

2

2) Open space protections need to be extended to the full period of the GUP. I would suggest a permanent Academic Growth Boundary, but at least to the end of the GUP term.

3

3) The secondary effects of the Stanford build out need to be evaluated. Increased activity on campus will generate a host of businesses and services off-campus.

4

It is only fair that Stanford pay for its impacts to our community infrastructure and services given that it is exempt from local taxes.

5

Sincerely,
Paul Goldstein
[REDACTED]
Palo Alto

5.2.3.62 Responses to Comments from Paul Goldstein

I-Goldstein-1 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Goldstein-2 Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, Mitigation Measure 5.15-2 requires Stanford to pay a fair share contribution towards the intersection improvements needed to reduce the significant impacts of the project.²² The Santa Clara County Planning Office would use the fair share contribution to fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for intersection improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area. 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 project proponent is only required to pay its fair share contribution toward intersection improvements (rather than fully fund or construct such improvements) as identified in the Draft EIR. Pursuant to CEQA Guidelines section 15127.4 (4)(B), mitigation measures must be “roughly proportional” to the project’s impacts.

I-Goldstein-3 This comment does not address the adequacy of the Draft EIR. Please also see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.

I-Goldstein-4 Secondary effects of the proposed Project are discussed in Chapter 6 of the Draft EIR in Section 6.4.2, Indirect Economic Growth.

I-Goldstein-5 All potential Project and cumulative environmental impacts of the proposed 2018 General Use Permit, including to public services and public utilities and service systems are addressed and mitigated to the extent feasible in the Draft EIR.

²² 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.

Comment Letter I-Graves

From: [Pria Graves](#)
To: [Rader, David](#)
Subject: Comments on the Stanford 2018 GUP Draft EIR
Date: Friday, February 2, 2018 10:51:07 AM

Dear Mr. Rader,

My comments on the EIR are below.

Thank you,

Pria Graves

[REDACTED]
Palo Alto, CA 94306
[REDACTED]

Comments on the Stanford 2018 GUP EIR

The Conditions of Approval of the 2000 GUP required Stanford to prepare a Sustainable Development Study for approval by the Board of Supervisors. The Community Plan states that the study “shall identify the maximum planned buildout potential for all of Stanford’s unincorporated Santa Clara County Land, demonstrate how development will be sited to prevent sprawl into the hillsides, contain development in clustered areas, and provide long-term assurance of compact urban development” (emphasis mine). Unfortunately, Stanford persuaded the Board of Supervisors to accept something much less far-reaching than was intended by this condition with the result that we are still no nearer to having any plan for Stanford to be sustainable into the future! The amount of growth requested in the 2018 General Use Permit does not address a sustainable future. This area is naturally drought prone and is becoming more so with the changing climate. We are already suffering from serious traffic congestion, air pollution and increasing random violence. So adding thousands of additional affiliates and millions of square feet of new development appears to ignore the facts. We are already beyond the carrying capacity of the area – it’s time to stop the growth.

1

The Board must hold Stanford to a higher standard: they need to develop a true plan for sustainability before any additional development is approved. Stanford should be setting the example, not continuing to pretend that we live in an infinite world.

Further specific comments:

1.2 Project Objectives

This section states that the GUP will enable Stanford to “provide venues for athletic and cultural experiences by authorizing new and expanded academic and academic support facilities “. This seems bizarre, given that the VMT analysis indicates that “for athletic and cultural (performances) events, no growth was anticipated” and in the greenhouse gas evaluation, the “with project” scenario indicates that the growth assumption for athletic and performances/major events is 0%! I find it hard to believe that Stanford intends to build new venues but not to increase the number of events.

2

Stanford must be held to this no-growth limit, eliminated existing events if they choose to add new events particularly including any outside rentals of their facilities such as the annual Earthquakes game. This use was

Comment Letter I-Graves

added during the term of the 2000 GUP but was not analyzed in that assessment of impacts.

↑ 2 cont.

5.1-4 Light or Glare

Mitigation measure 5.1-4 states that “State-of-the-art luminaries shall be used where necessary, with high beam efficiency, sharp cut-off, and glare and spill control” and that “upward glow shall not be allowed in residential or academic areas”. While “upward glow” is not really defined, this restraint has not been evident during the term of the 2000 GUP. As Stanford has added more and more and more athletic lighting in the DAPER area, the “glow” visible from my home in College Terrace continues to brighten. On nights with any overcast, I can actually read mid-sized print by the current “glow”. This mitigation has not proven effective so additional steps must be taken. At a minimum, all field lights should be extinguished by 10 p.m.

3

5.1-5 Scenic Resources

Under the terms of the 2000 GUP, mitigation OS-4 committed to protect the visual quality along El Camino Real, noting that the “Stanford foothills provide a scenic backdrop”. This commitment was addressed in the 2007 Plan for El Camino Real Frontage, which unfortunately requires only a 20-foot setback and 50 foot height limit. This has clearly not been sufficient to protect the historic visual resources that exist along that route.

While the buildings along the El Camino Real corridor have complied, Stanford’s other actions have, regrettably, already ruined the view of the historic Hoover Tower and the hills beyond by installing huge numbers of light standards within a few hundred feet of the corridor. Please refer to photos 1 – 3 in comments submitted by Thomas Vlastic, dated November 8. In the daytime, the view is now simply ugly. At night, the lights can be blinding.

The County should require that these light standards be removed and the views restored to comply with the 2000 GUP as a pre-condition of approval of the 2018 GUP.

4

5.2-3 TACs and PM2.5

5.2-2 Fugitive Dust –

It is noted that use of Best Management Practices will reduce this potentially significant impact to “less than significant”. These practices require that dust/dirt be watered two times per day if not covered. Unfortunately during the term of the 2000 GUP piles of dirt were left uncovered and dry over weekends resulting in large amounts of blowing dust carried into the adjoining neighborhoods. Best Management Practices also requires that all haul trucks transporting loose material must be covered. This, too, is not always being observed currently.

An additional requirement is that there be a sign with a telephone number to register dust complaints and that the person shall take corrective action within 48 hours. This delay is completely unacceptable if a huge cloud of dust is being blown about in our increasingly frequent high winds. A response within one to two hours must be required.

5

5.2-10 - Fireworks -

Firework displays at Stanford are an additional source of airborne contaminants including gaseous sulfur dioxide, carbon dioxide, carbon monoxide, trace elements such as aluminum, manganese and cadmium as well as particulate matter. These substances spread into adjoining neighborhoods for hours after each display. Although these events are infrequent, their impact cannot be discounted especially since they are often held during warm weather when nearby residents are likely to have their windows open. Fireworks in this setting are frankly not appropriate and should be discontinued.

6

5.7 Greenhouse Emissions

The County of Santa Clara CEQA Guidelines raises the question of whether the Project would have a significant impact on greenhouse gases if it would “generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact”.

7

This section covers many sources of GHG emissions but those resulting from the construction activities appear to be limited to the use of construction equipment.

This must be expanded to include consideration of the indirect greenhouse gases resulting from the manufacturing processes needed to produce the construction materials such as concrete and steel. Although these materials are not manufactured on site, basic market economics tells us that it is Stanford's enormous construction projects which drives the demand for them. Without Stanford's demand, the manufacturers would not be making them in such quantities! The SCoPE2035 group's comments address this well, proposing that "all building projects be carbon neutral through the entire life cycle, including construction, material extraction/processing/transportation, use phase, and demolition" [emphasis mine]. I concur. Stanford must take ownership for this indirect effect of their continued growth.

Comments submitted during the scoping phase further requested that Stanford adopt plan to move to carbon neutrality. It is unfortunate that such a plan is conspicuously absent from the 2018 GUP.

7
cont.

5.8 Hazards

5.8-11 Emergency Response

As a College Terrace resident, it is very clear that the coordination between the various local emergency response agencies is less than ideal.

For example, on October 18, 2016, Stanford's outdoor emergency warning system malfunctioned and set off the entire siren system at 3:10 a.m. I phoned PAPD to find out why the sirens were sounding and was told that they were unaware of the situation. It was later explained to me by the Stanford Department of Public Safety that their focus had been on stopping the sirens and they "failed to think" about notifying the surrounding community. This is the 21st century and we live in the heart of tech country: an automated notification system must be put in place!

A second example occurred a few months later when we heard on the news that a groper was operating on campus within a few hundred yards of College Terrace! Our neighborhood should have been notified of this risk. When I asked why we hadn't been, I was asked (in a horrified voice) whether I ever walked alone on campus at night. I replied truthfully, that I do on occasion. And even if I stayed in my own neighborhood, the campus boundary is not going to stop such a predator...

Better coordination between Stanford Public Safety and Palo Alto (and other adjoining areas) is clearly needed to protect residents both on and off campus. When it comes to safety and emergency response, this is one community.

8

5.8-12 Wildland Fires

This section of the EIR acknowledges that "the majority of the developed area within the Academic Growth Boundary is designated as a community at risk of wildland fire".

It correctly points out that the fire agencies maintain a mutual aid agreement "to ensure that firefighting resources and personnel will be available" but the history of urban wildfires under situations of high wind prove that this is not sufficient to contain such fires. The 2017 Santa Rosa and 1992 Oakland Hills fires show that many lives and homes will be lost when such an urban wildfire occurs. Firefighters acknowledge that when there is too much wind, they cannot do much to combat the fires especially as water and retardant drop aircraft cannot be used.

In recent years, high winds in the Palo Alto area have occurred with increasing frequency. Given the large areas of eucalyptus trees (highly inflammable – think Oakland Hills!) as well as oaks and pines in the developed areas of the campus, any open flame under these circumstances, particularly in times of drought, could easily ignite a fire that could quickly spread to adjoining residential areas. Steps must be taken to prevent the start of such a fire.

Simply stating that the Project and other land uses "would include proper mechanisms to ensure that ... impacts

9

Comment Letter I-Graves

would be less than significant” is no longer enough. Stanford must take steps to reduce the likelihood of activities on campus igniting such a fire. No incendiaries such as fireworks and no open flames should be allowed during periods of high winds and/or dry conditions.

9
cont.

5.11 Noise Construction hours –

The 2000 GUP required that construction adjoining the City of Palo Alto comply with the City’s hours of construction. This requirement read “For construction in areas within 150 feet of the City of Palo Alto city limits, construction shall be limited ...” The 2018 GUP revises this to read “For construction within the Project site that would be 150 feet of sensitive receptors located within the City of Palo Alto, hours of construction activity shall be restricted ...”. ^[1]_{SEP} This leaves open the possibility that construction within 150 feet of the City limits but more than 150 feet from the nearest “sensitive receptor” could allow residents within Palo Alto subjected to truck traffic and other objectionable noise outside Palo Alto’s construction hours. This substantially undermines the intent of the previous requirement and should be corrected.

10

Fireworks – The 2000 GUP required that there would be no more than two fireworks events per year unless an entertainment event license is obtained from the Planning Office. Unfortunately this permit process turned out to be basically an automatic rubber stamp! In addition, while the restriction is mentioned as a background condition in the 2018 GUP application, it does not seem to be included in the new EIR.

11

Amplified sound - The implementation recommendation SCP-HS (i)18 requires that Stanford maintain a hotline that members of the public can contact to register complaints. Under the terms of the 2000 GUP, “The hotline shall be staffed during all outdoor special events with attendance greater than 10,000 persons or where amplified sound is used. “

12

At the time of the 2000 GUP, the implication was that Stanford was required to make an effort to reduce the impacts of their amplified events. For most of the period covered by that GUP, this did not happen and the hotline generally appeared to have been a farce. The person answering it was often unaware of loud on-campus events and was apparently helpless to do anything to address the problem.

Note: to their credit, in the past few years Stanford staff members Jean McCown and Lucy Wicks have worked hard to ensure that neighbors have received better notification of upcoming events and to decrease the volume of athletic event announcements. This is greatly appreciated but we cannot rely on this personal effort continuing until 2035. The terms of approval must make it clear that the effort needs to continue and needs to set specific limits on hours and volume of sound “leakage” into the surrounding community. Since this sound impact has been a long-term problem, Stanford needs to provide noise monitoring at their perimeter so they can take action to correct violations before the community feels compelled to complain. In addition, enforcement protocols must be clearly spelled out and the staff taking calls on the Noise Hotline must be able to take action promptly to correct violations.

13

5.15 Transportation and Traffic

There are many ways in which Stanford has made an admirable effort to meet the terms of the 2000 GUP. Their TDM program is a model to other institutions and with the new graduate housing soon coming on line, they will house the vast majority of graduate students on campus, improving their access to campus facilities while reducing their travel.

14

However, despite Stanford’s protestations to the contrary, there is considerable evidence that they have taken steps to circumvent the intent of the no-net-new-trips requirement. First, there is evidence of a program called CAPRI provides financial incentives to commuters who are able and willing to shift their arrival/departure times to avoid the “peak hour”. In addition, by allowing non-hospital affiliates to use Parking Structure 9 at the hospital (which is excluded from the cordon count), and supplying convenient shuttle service to transport people who park there to

destinations within the core campus, they are further “gaming the system”. In fact, the exclusion of the hospital from the cordon counts is, frankly altogether disingenuous: the hospital is used as a teaching and research facility and its traffic impacts should, realistically, be evaluated along with the rest of the campus. Sadly, the entire CEQA evaluation process is flawed from the beginning! By failing to look at the impact of all Stanford development as a whole, the magnitude of the combined impact is grossly underestimated.

14
cont.

Finally, although the area-wide traffic problem is certainly not entirely of Stanford’s making, it has become absurd to speak of a “peak hour” when considering the commute congestion in this area. It is more like a “peak three hours”, twice a day. To count only 10 hours per week and ignore the traffic that occurs during the other 158 hours is absurd. Greenhouse gas production as well as congestion (which in turn exacerbates the greenhouse gas problem) should be considered 24/7. Stanford needs to take ownership for all of their traffic, to campus and to their hospital (including their 60 satellite branches!). I propose that there should be no-net-new-trips period. And further, they should develop a plan to reduce auto trips going forward.

15

5.15.2 Identifying Residential Streets for Study

While the interior streets within College Terrace and Crescent Park neighborhoods remain vulnerable to traffic impacts (as noted in the EIR), these neighborhoods and others including Southgate and Old Palo Alto are also seriously impacted due to high volume Stanford-related traffic along their edges. Even if Stanford cars are not cutting through the neighborhoods, the congestion makes it difficult for residents in these areas to travel during times of heavy traffic. This impact must be included in the studies and mitigated.

16

Although permit parking in a number of neighborhoods has helped to deter Stanford parking on weekdays, the cost burden of this deterrent has been pushed off onto the residents of Palo Alto! Stanford should help defray the cost of at least one resident permit per household since it is an externalized cost of their growth. And the areas covered by permit parking will most likely need to be expanded over the terms of the 2018 GUP. Apparently some Stanford affiliates are driving into neighborhoods not yet protected by parking limitations and then using UBER or LYFT to travel the last mile or two. And to add insult to injury, since these hired vehicles do not remain on campus, such trips would be subtracted from the cordon count.

5.15-1 Construction Impacts

In addition to the potentially significant impacts listed and addressed, the physical damage to truck routes caused by construction traffic must be considered and mitigated.

17

For example, the massive numbers of large trucks traveling on El Camino Real in recent months have damaged the pavement to the point where it presents a trip/fall hazard to pedestrians crossing the street and a safety risk to bicycles using the road. There are certainly other sources of similar traffic in the area but Stanford must be held accountable and pay for their share of repairs/repaving.

5.15.6 VMT Analysis

I understand that this is an evolving approach but it strikes me as illogical in the extreme that the Home-Based-Other trips (trips to destinations besides work) are included for affiliates who live on campus but are excluded from consideration for those who live in the surrounding communities such as Palo Alto, Menlo Park, etc.

18

This is especially unfathomable if these affiliates (and their families) live in housing owned by Stanford such as the 180 units soon to come on-line in the “University Terrace” development (two blocks from campus across College Terrace) and even more so when they live in the 23 properties Stanford has acquired within College Terrace. Why should one differentiate between the impact of trips associated with 1015 Stanford Avenue (on the College Terrace side of the street), and 319 Olmstead, directly across the street on campus?

5.15.7 Transit Capacity – Caltrain

The analysis of Caltrain capacity is either flawed or badly explained.

19

The analysis states that the two peak load stations are California Avenue and San Carlos. San Carlos may make sense despite the fact that it is not an express stop. But given the proximity of California Avenue to the main Stanford Station, Palo Alto, I fail to see why anyone would be likely to use that station to travel to/from Stanford.

The only other alternative is that “peak load station” refers to the point along the line with the maximum number of

Comment Letter I-Graves

Stanford-bound passengers being on board, regardless of where they boarded. This doesn't seem to agree with the statement that "only passengers boarding, rather than alighting, at peak load stations during the peak hour were counted" but otherwise I can make no sense of the choice of stations.

↑ 19
cont.

Regardless of the meaning of "peak load station", I dispute the current "excess capacity" assumed by the analysis!

I have personally observed that by the time northbound morning peak trains reach Palo Alto, most are already at standing capacity. And similarly in the evening, the southbound trains such as train 268 (which operates as a local from Redwood City), are still at standing capacity at California Avenue! With traffic in the Bay Area becoming increasingly congested and the cost of gasoline continuing to rise, demand for rail service has been increasing dramatically. In addition, many communities are encouraging the addition of dense transit-oriented housing in proximity to Caltrain, which will also have the effect of increasing demand.

20

I believe that this erroneous assumption of available capacity in the EIR results from use of obsolete input data. The Caltrain TIRCP 2018 Application (submitted 1/12/18), acknowledges that "the system is currently running at operating capacity" and that ridership jumped by 47% between 2012 and 2017 forcing Caltrain to substantially revise their projections from the previous set based on 2013 figures.

Apparently if Caltrain is able to obtain sufficient funding to purchase additional EMUs and lengthen platforms to accommodate 8-car trains, there will be increased capacity following electrification. But at present there is no such guarantee and with the 6-car consists currently on order, seated capacity will actually decline! Although the VTA travel demand ridership model is "capacity-blind", studies elsewhere indicate that both perceived and actual travel time on trains increases with increased numbers of standees, acting as a strong deterrent to train use.

21

Stanford must be required to help pay for additional EMU equipment and platform extensions as needed to allow Caltrain to provide the increased capacity they are assuming!

A further note regarding stations served by Caltrain: With the advent of the so-called bullet trains, commute period service at California Avenue was effectively gutted. I commuted for 16 years from Cal Ave. to Lawrence/Santa Clara but with only one train per hour connecting those stations in the bullet-era, I'll admit that I'd most likely return to driving!

22

The limited service at Cal Ave. has a huge potential for dissuading research park workers and EV/College Terrace/University Terrace residents from using Caltrain. Since Stanford is increasing their working and resident populations in the area south of Campus, improved frequency at this station is necessary. Instead, it appears from a 2014 VTA memorandum regarding the Caltrain Electrification Project that Caltrain is actually planning to further erode the usability of California Avenue for commute use. The proposed 2020 and 2040 schedules completely eliminate direct commute period trains between Cal Ave and many other stations such as Lawrence/Santa Clara to the south and San Carlos to the north, forcing commuters to endure a 10 to 20 minute wait at some intermediate station.

23

The County and Stanford need to work with the JPB to find ways to increase the usability of service at California Avenue during the commute peaks.

5.2.3.63 Responses to Comments from Pria Graves

I-Graves-1 For comments made regarding carrying capacity and sustainability, please refer to Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study for a discussion of an update to the Sustainable Development Study prepared by the County.

A number of general comments are also made about existing traffic congestion, climate change, air pollution and random violence, and how the proposed Project ignores these issues. Due to the lack of specificity in these comments, no specific responses are possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Please, however, see Draft EIR, Sections 5.2 Air Quality, 5.7 Greenhouse Gas Emissions, 5.9 Hydrology and Water Quality, 5.13 Public Services, and 5.15 Transportation and Traffic, which addresses all Project and contribution to cumulative effects on air quality, greenhouse gases, public police protection and transportation associated with the construction and operation of the proposed Project.

I-Graves-2 The full project objective that the comment is referring to is “(e)nable Stanford to further its academic mission, provide state-of-the-art facilities for research and learning, encourage interdisciplinary collaboration, maintain flexibility to respond quickly to changes in educational or research technologies, and provide venues for athletic and cultural experiences by authorizing new and expanded academic and academic support facilities at a growth rate from 2018 through 2035 that is consistent with Stanford’s historic annual growth rate for academic and academic support facilities.” As such, this is a broad objective that covers the provision of all on-campus academic and academic support facilities, including those for athletic and cultural experiences, and may include new construction, rehabilitation, relocation, and/or replacement of facilities. Stanford already includes existing visitor drawing facilities such as the Stanford Stadium, Bing Theater, Frost Amphitheater, etc. It should be noted that under the 2000 General Use Permit, Stanford replaced its stadium with a smaller capacity facility. Stanford has stated it has no specific plans to expand its athletic and cultural facilities in a manner that would substantially change the number of visitors to the campus.

I-Graves-3 Please see Response to Comment O-SCAS-3.

I-Graves-4 Please see Response to Comment A-PA-19.

I-Graves-5 As discussed in the Draft EIR Section 5.2 Air Quality, Mitigation Measure 5.2-2 specifies that Stanford shall require all construction contractors to implement the BAAQMD-identified dust control measures included in the mitigation measure. Implementation of these measures would ensure fugitive dust generated during construction would be reduced to a less-than-significant level.

These measures include posting a publicly visible sign with the telephone number and person to be contacted regarding dust complaints. BAAQMD specifies that responses to dust complaints should be within 48 hours. Regarding the comment's request that responses to dust complaints should instead be within one or two hours, this will be considered by the County decision-makers prior to Project approval.

I-Graves-6 There are currently two pre-permitted fireworks events at Stanford per year. Should the number of fireworks events increase beyond the two pre-permitted displays per year, Stanford is required to obtain entertainment permits from Santa Clara County, which includes consideration of noise and other effects. Fireworks programs are relatively short, and temporary in nature and as a result would not result in significant adverse air quality effects on the environment.

I-Graves-7 This comment requests that the County adopt a policy of carbon neutrality for all new construction. This is a policy matter for the County Board of Supervisors to consider. Section 5.7 of the Draft EIR analyzes the Project's GHG emissions consistent with CEQA requirements. Although there is no regulatory definition for "lifecycle emissions," the term is generally used to refer to all emissions associated with the creation and existence of a project, including emissions from the manufacture and transportation of component materials, and even emissions from the manufacture of the machines required to produce those materials. However, since it is impossible to accurately estimate the entire chain of emissions associated with any given project, lifecycle analyses are speculative and limited in effectiveness (relative to assessing or reducing Project-specific emissions for the CEQA analysis). The California Natural Resources Agency ("CNRA") has stated that lifecycle analyses are not required under CEQA,²³ and in December 2009 CNRA issued new energy conservation guidelines for EIRs that make no reference to lifecycle emissions.²⁴ The CNRA explained that: (1) There exists no standard regulatory definition for lifecycle emissions, and (2) Even if a standard definition for 'lifecycle' existed, the term might be interpreted to refer to emissions "beyond those that could be considered 'indirect effects'" as defined by CEQA Guidelines, and therefore, beyond what an EIR is required to estimate and mitigate.²⁵

I-Graves-8 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

²³ California Natural Resources Agency, 2009. Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97, pp. 71-72. http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed November 18, 2018.

²⁴ State CEQA Guidelines, Appendix F. These new guidelines were part of amendments issued pursuant to SB97. A copy of this document is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2007.0903E.

²⁵ California Natural Resources Agency, 2009. Final Statement of Reasons for Regulatory Action: Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB97, p. 71. http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf, accessed November 18, 2018.

However, Project impacts related to adopted emergency response and evacuation plans are addressed in Section 5.8 Hazards and Hazardous Materials, Impact 5.8.8 and Impact 5.8-11. Project impacts to fire protection, emergency medical and/or police protection services is 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.

I-Graves-9 Please see the Draft EIR Section 5.8, Hazards and Hazardous Materials, Impact 5.8-9, which adequately addresses the potential for the Project to result in exposure of people and structures to wildland fires. The impact discusses that fire protection services would be provided to the Project site by the Palo Alto Fire Department (PAFD) as part of the continuing agreement between the City and Stanford. The PAFD delivers emergency and non-emergency services, including rapid assistance for fires, and enforces implementation of all California Fire Code requirements. In addition, all of Santa Clara County's fire agencies are part of both countywide and State mutual aid agreements to ensure that firefighting resources and personnel are available to combat wildland urban interface fires. All development associated with the Project would be required to include fire suppression design requirements as specified in current adopted building codes. Implementation of applicable fire and building code standards would ensure that adequate fire and life safety measures are incorporated into the Project in compliance with all applicable state and local fire safety regulations. All the above factors would reduce the potential impact associated with exposure of people and property to risk involving wildland fires to a less-than-significant level. Cumulative impacts to wildland fires are addressed in Draft EIR Impact 5.8-12 which similarly finds the impact to be less than significant.

As explained in Response to Comments I-Graves-6 above, Stanford is required to obtain entertainment permits from Santa Clara County. Any use of fireworks would be subject to applicable State and local permitting standards for pyrotechnic displays, ensuring that the use of fireworks would not be of a type or located in a location that may be hazardous to property or people.

I-Graves-10 The comment conflates construction noise measures included for the 2000 General Use Permit with those identified in the Draft EIR for the proposed 2018 General Use Permit.

The mitigation identified in the Draft EIR for Project construction noise impacts apply differently depending on the significance criteria being analyzed. Impact 5.11-1 addresses *off-site* construction noise impacts pursuant to standards established in the general plan and noise ordinance. Draft EIR Mitigation Measure 5.11-1 specifies that for Project construction within 150 feet of *off-site*

sensitive receptors, a noise performance standard of 75 dBA at the nearest off-site single-family residence and 80 dBA at the nearest off-site multi-family residence is established, to be achieved through implementation of specific construction noise control measures and a noise control plan. This also includes adhering to hours of construction established by the City of Palo Alto Noise Ordinance for work within 150 feet of sensitive receptors within Palo Alto; and adhering to hours of construction established by the County Noise Ordinance for work within 150 feet of off-site sensitive receptors within all other residential areas.

Impact 5.11-2 addresses the potential for the Project to result in temporary or periodic increases in ambient noise levels at on-site and off-site sensitive receptors, regardless of the general plan and noise ordinance. Mitigation Measure 5.11-2 similarly mitigates this Project construction noise impact at *off-site* sensitive land uses by requiring the implementation of the same measures as those included in Mitigation Measure 5.11-1. However, for the Project construction noise impact at *on-site* sensitive land uses located within 150 feet of the construction site, Mitigation Measures 5.11-establishes a specific performance standard of 80 dBA over an 8-hour period at the nearest on-site residence or day care land use, to be achieved through implementation of specific construction noise control measures and a noise control plan.

I-Graves-11 Please see Response to Comment I-Graves-6 and Response to Comment I-Graves-12.

I-Graves-12 The comment discusses amplified noise events at Stanford that occurred under the 2000 General Use Permit. The comment references Stanford Community Plan Policy SCP-HS (i)18 (“Require that Stanford maintain a hotline that members of the public can contact to register noise complaints”). The 2000 General Use Permit Condition R.5 expanded on this policy (“The hotline shall be staffed during all outdoor special events with attendance greater than 10,000 persons or where amplified sound is used. All calls to the hotline shall be reported to the County on an annual basis as part of the Annual Report process.”)

However, it should be noted that Stanford currently staffs the hotline 24/7 and is no longer associated with just special events. As discussed in the Draft EIR Appendix BCR, page 103, callers are informed that they can either report their complaint for the record, and/or are offered the option to be transferred to non-emergency police dispatch so the complaint will be responded to in a timely manner.

This Stanford Community Plan policy and existing General Use Permit condition were not associated with a mitigation measure from the 2000 General Use Permit Final EIR, and the Draft EIR for the proposed 2018 General Use Permit similarly does not identify such mitigation. Rather, these are planning related policies regarding governing special events at Stanford.

This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Graves-13 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Graves-14 The cordon boundary was developed in 2001 to measure trips to and from the campus as envisioned by the Stanford Community Plan. Please refer to 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 6: No Net New Commute Trips Standard.

I-Graves-15 The Level of Service methodology used to evaluate traffic operations 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 the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Graves-16 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for information on how neighborhood streets were selected for evaluation in the Draft EIR, and Topic 6: No Net New Commute Trips Standard for information on how rideshare services are accounted for in the calculation of cut-through trips.

As described in Draft EIR Appendix PKG, the 2000 General Use Permit Condition H.2 required Stanford to participate in residential parking permit programs in neighborhoods within the City of Palo Alto at a total cost not to exceed \$100,000. Stanford is in compliance with this condition as it paid \$100,000 to Palo Alto, which used the funds to implement a parking permit program in College Terrace.

The College Terrace Residential Permit Program was implemented in 2009 and includes the area generally bounded by Stanford Avenue, Yale Street, California Avenue, and Amherst Street. The RPP allows vehicles displaying a resident permit, guest permit, or day permit, to use on-street parking, Monday through Friday from 8 AM to 5 PM. The College Terrace RPP covers the majority of the streets in College Terrace other than a few short blocks on Dartmouth and some multifamily areas on Williams. At the time of implementation of the program,

neighbors where asked on a street-by-street basis if they would like to opt into the program with the knowledge of the on-going costs.

The annual monitoring conducted at the campus gateways does not support the statement that campus affiliates are taking Uber and Lyft from nearby neighborhoods. The percentage of cut-through traffic removed from the cordon counts has stayed consistent throughout the monitoring period, and did not change with the introduction of Uber and Lyft. It should be noted that Mitigation Measure 5.15-2 has been clarified to state that if data is available or it is feasible to measure, the County will include rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs in the cordon counts.²⁶

With regard to streets at the edges of residential neighborhoods, the EIR evaluates impacts at intersections along such arterials.

- I-Graves-17 The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual 2018 General Use Permit projects.

The 2018 General Use Permit EIR is a program-level evaluation, and does not specifically consider individual projects. As such, construction impacts are addressed at a programmatic level. Project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at the time they are proposed to determine whether the environmental effects of the specific project were adequately disclosed in the 2018 General Use Permit Program EIR. Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

- I-Graves-18 Please refer to Master Response 13: Transportation and Traffic, Topic 11: Vehicle Miles Traveled for information on how the annual travel survey and the VTA travel demand model were used to establish and validate VMT generation estimates for the 2018 General Use Permit.

- I-Graves-19 A peak load is the maximum load on the system. In the transit analysis (see page 6 of Draft EIR Appendix TBC), it is the peak load points in each direction

²⁶ 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.

that represent the highest passenger load point that Stanford commuters affect. Only the passengers boarding are counted because those that are alighting are not adding to the load of the train, but making room for new riders. California Avenue Station is the peak load station because it is carrying the largest number of Stanford commuters and non-Stanford commuters at a point before all Stanford commuters would alight – at Palo Alto (University Avenue) Station.

I-Graves-20 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.

I-Graves-21 The Transit Capacity analysis presented in the Draft EIR (and subsequent addendum report presented in Appendix TBC-ADD in this Response to Comments Document), shows that campus growth will not result in Caltrain capacity exceedances. Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains. Further, Stanford is working closely with Caltrain to create a business plan for future service enhancements. Stanford has provided funding to Caltrain for this purpose as well as professional services. While the commenter states that capacity shortfalls are likely, Caltrain has an objective to increase, not decrease service, as described in the Business Plan Strategy and Scope. The Plan will include a year-to-year description of how service on the corridor will grow and change to achieve the 2040 Vision. If Caltrain were to reduce its service or reduce capacity, Stanford could implement other transportation demand management programs, such as express bus service to transport Stanford affiliates to the campus.

The Draft EIR explains on page 5.15-155 that the Governor's Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

I-Graves-22 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.

I-Graves-23 The comment is noted, but does not address the adequacy of the Draft EIR. The comment will be considered by the County as part of the review process.

Comment Letter I-Hansen



County of Santa Clara
Department of Planning and Development

Stanford University 2018 General Use Permit Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.

Name: Stuart Hansen

Organization (if any):
resident, home owner

Address (optional):
[REDACTED]

City, State, Zip:
Palo Alto, CA. 94303

E-mail:
[REDACTED]

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

1. P. Alto already has a jobs-housing imbalance close to 4:1 and growing. 1
2. Stanford wants to add: 2.3 million sq. ft. on-campus.
1.3 " " med. center
1.3 " " Redwood city
0.8 " " research park
Total non-residential = 5.7 million sq. ft. ! 2
3. We simply cannot accommodate all these people without creating grid-lock and infrastructure overload. 3
4. Stanford has still not produced their maximum build-out data for existing GUP 4
5. No new GUP without on-campus plan to house, educate and transport all these people ! 5

(More space on reverse side)

5.2.3.64 Responses to Comments from Stuart Hansen

I-Hansen-1 Please refer to Response to Comment A-PV-3.

I-Hansen-2 to I-Hansen 3

The comment adds the square footage of new academic and academic support space requested under the proposed 2018 General Use Permit with other non-Project off-site Stanford-related development, including the Stanford University Medical Center (SUMC) and Stanford Research Park, and indicates that the associated people with these developments cannot be accommodated without creating gridlock and infrastructure overload.

With respect to how the Draft EIR treats non-Project, off-site development projects in either the baseline or cumulative context, 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 see Draft EIR Section 5.15 Transportation and Traffic, and Section 5.16 Utilities and Service Systems, which address all Project and contribution to cumulative traffic and utilities impacts associated with the construction and operation of the proposed Project, and mitigation that reduces significant impacts to the extent feasible.

I-Hansen-4 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

I-Hansen-5 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Comment Letter I-Harman

From: [REDACTED]
To: [Rader, David](#)
Subject: Stanford Weekend Acres-Alpine Rd.
Date: Wednesday, November 22, 2017 1:03:42 PM

At this point in time it is very difficult to enter or leave Alpine Rd from Stowe Lane at commuter hours. If Stanford's plans go through as projected we will all have to use a helicopter to get out at any time of day.

Please consider the plight of the locals that have to use Alpine Rd when you are considering Stanford's ambitious plans. Any chance Stanford could be forced to join forces with the County to build a new road to campus from 280?

1

5.2.3.65 Responses to Comments from J Harman

I-Harman-1 Existing traffic congestion on Alpine Road is noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard. Please also refer to Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

Please also refer to Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives for the discussion of a potential new roadway connecting I-280 to Stanford.

Comment Letter I-Hearn

Jerry Hearn

Portola Valley, CA 94028-8109

January 29, 2018

David Rader

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

Re: Stanford 2018 GUP DEIR

Dear Mr. Rader,

Thank you for the opportunity to make comments to the Draft Environmental Impact Report for the application by Stanford for renewal of its General Use Permit in 2018. I have attended a number of the meetings held around this topic and have made verbal comments at one of them. Some of those comments may be made again in this letter.

Background

Overall, I feel that the DEIR provides a reasonable analysis of the potential environmental impacts of the development program for which Stanford is requesting approval. The information is extensive and, at times, a bit challenging to assimilate. I have chosen to limit my comments to areas around which I have either knowledge or concerns. That does not mean that I may not later have additional concerns; the limitations on my time require that I address only a few items.

1

Biological Resources

As I mentioned in my oral comments, I think Stanford is doing a good job of maintaining its biological resources. The completion of the HCP, along with the establishment of no-build zones, conservation easements and special conservation areas have been a huge step forward in preserving both special status species as well as the diversity of habitats that is necessary for sustaining a resilient landscape. The mitigation measures spelled out in the DEIR for development activities within the Academic Growth Boundary appear to be the normally

2

accepted approaches that have proven effective over time. As long as Stanford continues to add to the resources (staff and financial support) required to truly implement all these efforts, I am comfortable that the approaches outlined in the DEIR will prove effective.

2
cont.

Geology and Soils

This section of the DEIR focuses on the physical aspects of soils as they relate to building stability in seismic events and erosion of soils. What is not addressed here is the biological components of soils. Soils provide the basis for life, and assuring that they are preserved or restored to their prior biologic status after disturbance should be addressed either here or under biological resources. As any soil scientist will tell you, soils are fundamentally different from dirt, and this analysis treats them merely as dirt while addressing issues such as liquefaction, settlement and erosion.

3

Hydrology and Water Quality

In general, this section does a good job of describing the various aspects of hydrology as they pertain to this project. As a person who has been involved with water issues in the area for over a quarter of a century, I have some specific comments.

4

Pages 5.9-7 and 5.9-8 Surface Water Quality

This section states: “The water quality results are relatively consistent and are typical of an urban area.” I would like to see in the cited table (5.9-1) an additional column that lays out corresponding ranges or figures that give some quantitative measures for “typical results of an urban area” for comparison purposes. This is a pretty standard approach for water quality results.

Page 5.9-10 Figure 5.9-3 Groundwater Well Locations

It would be useful to know why two of the wells have a letter “R” after their number.

5

Page 5.9-16 Sustainable Groundwater Management Act of 2014

In the first paragraph on this page, it would be better to indicate here that the SCVWD has applied to be GSA under the provision of this law, and then restate it

6

later where it already occurs. In the third paragraph, it would be good to indicate what the criteria are for the DWR to categorize each groundwater basin as described, instead of just referencing that categorization. There is some thinking that either the Santa Clara or San Mateo Plain sub-basin may move into a higher category if significant groundwater pumping is resumed which could readily result in aquifer depletion such as occurred in the not-too-distant past. Knowing the thresholds of those determinations is a useful piece of information for analyzing this aspect of the DEIR and considering preparations for that very distinct possibility.

6
cont.

Page 5.9-26 Re: Impact 5.9-4 (loss of aquifer volume)

Measurements of the effectiveness of on-site retention facilities are notoriously difficult to conduct. As far as I know, standard numbers associated with varieties of treatment are not available as of yet, though they are being worked on. A fair assumption, then, is that even after these treatments are employed there will be a loss of infiltration into the aquifer due to the increased areas of impermeable surfaces.

7

To mitigate these losses in the Unconfined Zone, additional water is supplied to Lake Lagunita for percolation into the aquifer. According to figures previously given, that results in an addition of around 700 AFY to the San Francisquito Cone. Between 2012 and 2015 Stanford has made withdrawals from that same aquifer averaging 584 AFY. Though this appears to be balanced on average, the withdrawals fluctuate between 127 AFY to 1359 AFY, which, to my mind, stretches the concept of “relatively constant”. It is easy to foresee a future in which Stanford, for any number of reasons, may become more dependent on groundwater to the extent that, in emergencies, water that currently is not potable would be made so to meet domestic water demand.

Stanford does a fine job of managing its water supply to this date. My big concern here is that with the effects of climate change most probably resulting in a reduction of available supply, particularly in seasonality variations, Stanford and other local jurisdictions will become more dependent upon the local aquifer as a source for both potable and non-potable water.

8

Given this probably scenario, I would suggest that as part of the GUP, Stanford be encouraged or required to:

- install a “scalping plant” with direct connection to an infiltration system which would collect the wastewater collected on campus and use it to recharge the aquifer. Such a plant is being installed off Sand Hill Road in Menlo Park;
- survey all permeable areas on the campus in the Unconfined Zone to determine whether they are operating effectively as recharge areas or retrofit them to do so;
- consider other areas of the campus at which a direct aquifer recharge station could be put into service to move more of the lake system water into the aquifer for storage against future needs.

8
cont.

Water is already the limiting factor to human and natural growth in the West, and is affecting the plans of cities in the immediate area. Many of them will be considering utilizing the aquifer for slaking their water needs, and to avoid a “tragedy of the commons” they, as well as Stanford, should be held to the same standards of balancing supply and demand.

Land Use and Planning

The scale of development that Stanford proposes in this GUP application, coupled with the existing development, will impact the habitat of a multitude of non-human species in ways that we are not even aware of. The key to continued development in a sustainable fashion is the Academic Growth Boundary that preserves a significant portion of Stanford lands for activities that have much smaller impacts to these species. The Stanford Community Plan makes this abundantly clear. Given this agreement about the importance of this boundary, I strongly recommend the Academic Growth Boundary be made permanent to protect the natural resources that are being so well protected due to this growth limit. If that is not possible, it should at least be extended as part of the GUP approval to the year 2035. In addition, I feel strongly that the 4/5 rule for supervisors to modify the boundary should be made a permanent fixture of this and any other future GUP application by Stanford.

9

My following comments concerns issue I have limited expertise in, but as they are areas of great public concern, I feel the need to weigh in on them.

Traffic/Parking

↓ 10

This is a huge issue for the region as well as Stanford. The No Net Trip approach is a good one, but needs revision. It is my experience that the peak hour commute has expanded in such a way as to become a peak three-hour commute period. The traffic analysis should expand to accommodate this as this is the reality that we are all facing these days. I could not tell if the new traffic monitoring system is going to be activated 24-7 to collect real data (preferable) or whether it will be just as before. Nevertheless, I feel it will more accurately reflect the status of traffic and I think it is a good idea.

10
cont.

As a person who comes to the campus often, and struggles with finding a parking place, I nevertheless applaud Stanford's efforts to reduce vehicle trips to the campus. I would suggest that Stanford build no more parking at all. Instead, any money for that use should be offered to entities that are creating novel solutions to the traffic / parking dilemmas that we all face. My experience is that people will only change their habits when it becomes too painful to not do so. I myself now think twice about coming to the campus when not absolutely necessary to do so. I know this is a harsh approach, but the situation is only going to get worse if a line in the sand is not drawn.

Population and Housing

Another challenging issue. I am pleased that Stanford is willing to provide additional housing for its community. However, I feel that the linkage between the population increase and available housing is not the correct one. I would like to see every new addition to the Stanford community be offered housing, preferably affordable commensurate with the compensation being offered. I know this is a very aspirational viewpoint, but, in the long run, the university and the local community will benefit greatly from this approach.

11

Recreation

If, indeed, it is required that Stanford house all the additional population that results from the proposed growth on campus, then the analysis of the impacts on recreation facilities and open spaces will need to be adjusted to account for this increased demand.

12

Final Comment

As those of us who have lived in the area for decades can attest, Stanford has been adding facilities at a rapid rate over the last half century. One questions the

13

efficacy of all this growth and whether there is a limit, a carrying capacity if you will, beyond which the affected area becomes dysfunctional. I, and others, would like to see Stanford attempt to provide an ultimate build-out scenario(s) as called for in the request for a Sustainability Study. While I understand that the accuracy of such an exercise has its obvious limits due to the time horizons involved, I feel that it would prove instructive to the comparison of the development called for in this application to what the project area might ultimately look like.

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13
cont.

Thank you, again, for the opportunity to offer these comments and I look forward to the next round in the process of shaping this development request.

Jerry Hearn

5.2.3.66 Responses to Comments from Jerry Hearn

- I-Hearn-1 The comment is noted. Please see Master Response 1: Non-CEQA Comments.
- I-Hearn-2 The comment is noted. Please see Master Response 1: Non-CEQA Comments.
- I-Hearn-3 As discussed in Draft EIR Impact 5.6-1, individual projects developed under the 2018 General Use Permit would be required to implement construction best management practices (BMPs), as detailed in the Storm Water Pollution Prevention Plan (SWPPP) as required by the Construction General Permit from the National Pollution Discharge Elimination System (NPDES) program. These measures would serve to prevent soil erosion and loss of topsoil occurring during construction.
- The salvaging of topsoil whenever possible would serve to retain the soil's ability to support landscaping associated with the type of development that would occur under the proposed 2018 General Use Permit.
- The comment requests discussion of the biological components of soils, but does not provide any information indicating that the EIR omitted discussion of a significant impact related to this topic.
- I-Hearn-4 The presentation of data in Table 5.9-1 in the Draft EIR is provided at sufficient level of detail to adequately characterize existing stormwater quality at the Project site for purposes of impact analysis.
- I-Hearn-5 The comment questions why two wells have an R after their number.
- Wells 3 and 4 are replacements (R) for previous wells in the vicinity that were removed for development.
- I-Hearn-6 Please see Response to Comment A-SCVWD-3 and Response to Comment A-SCVWD-6, and Chapter 2 in this Response to Comments Document for revised text as it relates to the SCVWD being designated by the DWR as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin. Otherwise, the Draft EIR Hydrology and Water Quality regulatory setting is presented at a sufficient level of detail to provide regulatory context as it relates to the Project and Project site.
- I-Hearn-7 As noted in Draft EIR page 5.9-6, the amount of groundwater use, and relatedly surface water diversion, can differ substantially from year to year. In drier years, plants require more irrigation, and streamflows may be too low for Stanford to meet these demands with surface water, so Stanford pumps additional groundwater to meet its landscape irrigation needs. The notable range in groundwater use between 2010 and 2015 was due largely to the effects of the drought that occurred during that period.

Impact 5.9-4 in the Draft EIR determines 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. Impact 5.9-4 concludes that drainage control requirements, the projected use of groundwater wells, and the implementation of the Groundwater Recharge plan as identified in Mitigation Measure 5.9-4, would assure onsite infiltration such that development that would occur under the 2018 General Use Permit would not substantively reduce the aquifer volume or lower the local groundwater level; and that the impact would therefore be less than significant.

I-Hearn-8 As determined in the Water Supply Assessment (WSA) and reported in the Draft EIR Section 5.16, Utilities and Service Systems in Impact 5.16-2, the proposed Project would not require any groundwater to meet its potable water demand. Rather, as under existing conditions, its potable water demand would be completely met through a guaranteed supply of potable water from the SFPUC. The WSA and Draft EIR Impact 5.16-2 determines that groundwater supplies would be adequate to meet non-potable demand even during multi-year drought periods. As has been done historically, in periods of drought, Stanford would implement irrigation demand reduction measures to reduce non-potable water use. Impact 5.16-2 concludes that there would be sufficient water supplies to accommodate the water demand from buildout of the proposed 2018 General Use Permit through existing entitlements and resources under normal, single dry, and multiple dry water years, and therefore, the Project impact on water demand would be less than significant. Furthermore, Impact 5.16-7 determines the Project's contribution to cumulative increase in demand water would also be less than significant.

The suggestions identified in the comment to further reduce water demand are therefore not required as mitigation measures, but will be considered by the County decision-makers prior to Project approval.

I-Hearn-9 The comments are acknowledged. Draft EIR Section 5.3 Biological Resources provides a detailed assessment of existing biological resources on the Project site, how the Project would affect those resources, and includes mitigation measures to reduce those impacts to a less-than-significant level. Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.

I-Hearn-10 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

The comment regarding parking is noted, but does not address the adequacy of the Draft EIR. Please refer to 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, which includes the strict conditions for which parking would be expanded beyond the limit approved in the 2000 General Use Permit.

I-Hearn-11 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 5: Housing Linkage Ratio and Timing.

I-Hearn-12 As discussed in Master Response 8: Alternatives, Topic 1: CEQA Requirements for Alternatives, and Alternatives Evaluated in the EIR, on June 12, 2018, the County published Recirculated Portions of Draft EIR, which included an assessment of two new housing alternatives to the proposed Project were included (Additional Housing Alternatives A and B) that considered the implications of the construction of higher levels of housing on the Stanford campus.

The Recirculated Portions of Draft EIR considered the effect of the additional housing alternatives on parks and recreation facilities. The Recirculated Portions of Draft EIR determined that the increase in campus residents that would occur under the Additional Housing Alternative A would result in a further increase in off-campus public park visits resulting in a significant but mitigable impact, and contribution to cumulative impact, to turfs at the College Terrace parks, Heritage Park, and Stanford Hills Park, that would not occur under the proposed Project.

The Recirculated Portions of Draft EIR also determined that the increase in campus residents that would occur under the Additional Housing Alternative B would result in a further increase in off-campus public park visits resulting in a significant but mitigable impact, and contribution to cumulative impact, to turfs at College Terrace parks, that would not occur under the proposed Project.

I-Hearn-13 Please refer to Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comment Letter I-Heath

From: [Margaret Heath](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Friday, January 19, 2018 8:37:39 PM

Dear Mr. Rader,

I believe Stanford's GUP report regarding the impact of their proposed expansion on Palo Alto's streets is based on inaccurate assumptions which minimize what the true impact will be. Stanford must be asked to redo their study to include a more accurate projection of the impact their proposed expansion will have on Palo Alto's streets, which are already functioning at near capacity during the extended commute hours.

1

Specifically, the number of employees they claim will commute by train instead of automobile is overestimated.

A) Stanford's study claims there will be longer trains which their employees will be able to use, resulting in less impact on Palo Alto streets. However, the platforms are not long enough for these longer trains.

2

Unless, that is, Stanford is planning to pay to extend all the platforms to accommodate the longer trains they claim will accommodate their additional employees.

B) Stanford's study claims there will be more frequent trains as well as longer trains to accommodate their additional employees. However, more frequent and longer trains will effectively close the grade crossings during the extended commute hours at Churchill, E. Meadow, and Charleston. This will result in either long vehicle back-ups at those grade crossings, or push additional cars to the already at capacity El Camino intersections with Embarcadero, Page Mill/Oregon, and San Antonio, or both.

3

Unless, that is, Stanford is planning to pay for grade separation at Churchill, E. Meadow, and Charleston.

C) In addition, Stanford must extend the scope of their study to reflect the projected impact on ALL the train stations from San Francisco to San Jose. Including the impact on the parking capacity at the stations.

4

Stanford's proposed expansion will place great pressure on the area's already critical housing shortage. Their current proposal is inadequate given the amount of additional non-residential expansion proposed. Mitigation for permission for Stanford to build non-residential development should be tied to:

D) A proportional amount of residential construction, within Stanford's boundary, tied to the rate of non-residential construction. Housing that will be available to all Stanford employees, not just faculty and senior administration. Including below market and low income housing.

5

E) A significant area of the Stanford Research Park reassigned for dense housing. With a timeline for building said housing tied to the rate of Stanford's expansion.

6

Finally, as part of the required mitigation for the impact that will result from significant

7

Comment Letter I-Heath

construction, Stanford should be:

F) Required to permanently set aside the "Dish" as open space.

G) Required to permanently set aside the pasture land that is visible to the south of Page Mill Road, between Highway 280 and Foothill Expressway, as a buffer for the footpath that was built as mitigation for the last GUP.

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cont.
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Thank you for your consideration in this matter,

Yours faithfully,

Margaret Heath

[REDACTED]

Palo Alto, CA 94306

5.2.3.67 Responses to Comments from Margaret Heath

I-Heath-1 A general comment is made about use of inaccurate assumptions which minimize impacts on Palo Alto Streets, and request a redo of the analysis.

Due to lack of specificity in the comment, no specific response is possible; however, please see responses to individual comments below.

I-Heath-2 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.

Assumptions about future transit capacity were based on the best available information Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.

I-Heath-3 The City of Palo Alto is studying multiple scenarios related to grade separation and is not expected to have a preferred scenario until early-2019, which would then trigger a need to commence environmental review in 2019. Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.

I-Heath-4 Parking supply is not considered to be part of the physical environment as defined by CEQA, and parking deficits are considered to be social effects. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Consequently, no mitigation is required for these effects.

I-Heath-5 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Housing Linkage Ratio and Timing.

I-Heath-6 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Housing Linkage Ratio and Timing.

I-Heath-7 The comment requests as part of mitigation, to permanently set aside the Dish as open space, and permanently set aside pasture land visible south of Page Mill Road, between I-280 and Foothill Expressway.

Feasible mitigation measures are identified in the Draft EIR to mitigate significant impacts of the proposed 2018 General Use Permit. No specific Project or cumulative aesthetic/visual or other impacts are identified in the Draft EIR that require permanently setting aside such open space land as mitigation. However, these comments are part of the public record on the Project, and will be considered by the County decision-makers prior to Project approval.

Comment Letter I-Hermosillo

From: [Jose luis Hermosillo](#)
To: [Rader, David](#)
Subject: Community support
Date: Tuesday, January 30, 2018 10:13:02 PM

Dear David Rader, Mr.

Please consider been part of a huge solution to one of the biggest problems in our community help families raise kids to be a asset to this country and not a burden to society. I’ve seen families torn apart by loosing kids to drugs and gangs. Us parents have no choice but to live 100 plus miles or Work two jobs to pay astronomical rent prices And have very little time with our kids.
Please see this opportunity as a investment opportunity to lessen the impact of traffic and avoid much of the crisis and crime in our community!!!!
Thank you for understanding and believing in our community

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Sincerely,

Jose luis Hermosillo

Sunnyvale, CA 94087



5.2.3.68 Responses to Comments from Jose Hermosillo

I-Hermosillo-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Comment Letter I-Hetterly

February 2, 2018

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

Re: Stanford GUP DEIR

Dear Mr. Rader,

I am writing to express my concern about the impacts of Stanford's proposed expansion and the insufficiency of mitigations shown in the DEIR for their GUP Application.

My biggest concerns surround housing, school and transportation impacts. Stanford has long been a driver of local jobs growth, both on campus and off. Yet beyond some students (most undergrad and some grad-students) and faculty, Stanford has failed to provide sufficient on campus housing to support their daily on-campus population, including thousands of staff that support the University's academics and operations.

1

HOUSING

They have historically externalized the costs, challenges and burdens of meeting the housing and transportation demands of their job and student growth. The unmet demand for on-campus housing among Stanford affiliates has caused steep competition for rental units in the surrounding communities. In addition to driving up local rents and burdening existing supply, in recent years the University has been buying up non-Stanford properties and converting them to university housing, taking them out of the local rolling inventory of housing stock.

While Stanford proposes housing mitigations in the form of an \$11 million pledge to the County's affordable housing fund, even at an optimistic construction cost of \$500,000/unit, that pledge will only support 22 BMR units over three years. BMR units required under inclusionary zoning in off-campus, Stanford-supported projects produce only a small percentage and with priority given to Stanford affiliates, ultimately reduce the local public benefit of the inclusionary rules. Meanwhile, since the majority of graduate students and wage-staff associated with Stanford would be deemed low-income, the University produces a disproportionate demand for BMR housing.

2

RHNA allocations do not place the corresponding burden of meeting that demand on Stanford, but rather distribute it, to surrounding communities, primarily Palo Alto. Furthermore, under the 2017 State housing package, a municipality's failure to meet RHNA allocations, particularly difficult at all BMR levels, results in substantial loss of local control over land use - an outcome that undermines local self-governance and poses significant threats to environmental health, community character and quality of life. This is acutely problematic for Palo Alto due to its unique proximity to the majority of University operations.

While Palo Alto continues to have a high jobs/housing ratio, city efforts in recent years have resulted in a current marginal jobs/housing growth ratio of nearly 1:1. Yet outsized

jobs growth in nearby cities will combine with Stanford's under-housed expansion to radically increase housing competition and reduce opportunities for Palo Alto workers to reside in Palo Alto. This will inevitably increase residential displacement, traffic and Vehicle Miles Traveled for Palo Alto residents and workers.

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cont.

SCHOOLS

In addition to insufficiently mitigated housing demand impacts, the Stanford DEIR uses faulty student generation rate assumptions. The Palo Alto Unified School District (PAUSD) asserts that those assumptions severely undercount the enrollment growth likely to be caused by Stanford's proposed expansion. Furthermore, the Stanford GUP DEIR fails to reflect the cumulative impacts on school enrollment of the Stanford GUP and Palo Alto's updated Comprehensive Plan.

3

Palo Alto's Safe Routes to School Committee has submitted comments to the DEIR that raise significant questions about the sufficiency of analysis and proposed mitigations related to traffic and safety on school route roads and intersections and the traffic and safety impacts of school overflows likely to result from enrollment growth due to Stanford's expansion. Please give them due consideration.

TRANSPORTATION

According to the GUP DEIR, intensifying traffic and parking congestion in Palo Alto will worsen. While Stanford has demonstrated significant improvement in its trip reductions, many believe that the success of the program has plateaued. With the low-hanging fruit already accounted for, future improvement will be harder and slower. Stanford's ambition for extension of its No Net New Trips goal as its primary mitigation is not supported by sufficient data to establish its realistic likelihood of success. Proposed cordon counts do not reflect relevant peak periods, generous assumptions likely over-count pass-thru deductions, and insufficient data on Marguerite boardings prevent assessment of its potential contribution to future trip reduction. In addition, public transportation uptake rates are predicated on overly optimistic assumptions about capacity and ridership.

4

In particular, Stanford assumes maximum, best case capacity on Caltrain. Yet Caltrain's own comments on the GUP show a lower capacity on buildout of electrification (4,512 seated capacity vs Stanford's claimed 5,370 seated capacity) and indicate that Caltrain lacks the funding to purchase the needed EMUs to convert from diesel or extend train length and that it currently has no service plan to optimize the schedule. Caltrain's funding crisis in the recent past, highlights the unreliability of basing core mitigations on best case ambitions. These funding deficits offer potential mitigations that Stanford could help pay for (train cars are most urgently needed, followed by lengthening of platforms).

5

Furthermore, Stanford relies on a full capacity of 120% seated without taking into account the behavior disincentive of riding the train standing. After steadily increasing interest and demand, Caltrain experienced a drop in ridership last year, presumed to be due to a preference for alternate modes over a crowded, standing ride. Increased demand without adequate capacity makes for crowded trains - that can lead to LESS people actually wanting to ride the train. In an incentive-based strategy for mode shift, this behavioral step back offers cause for concern that Stanford may not meet its planned train ridership rates.

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Comment Letter I-Hetterly

Stanford assumes that Caltrain ridership by Stanford commuters will rise by over 2000 on a daily basis or some 60% above today's level (EIR, 5.15-159). But that assumes a 20% increase in number of rush hour train trips and a 65% increase in passenger capacity of each train. (EIR, 5.15-158/59). They also assume an increase of 24% in the number of bus riders on both local and express buses. (EIR 5.15-165, 167). Even with these very optimistic forecasts, Stanford is asking for 3400 new parking spaces. (EIR 5.15-172).

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cont.

The traffic analysis identifies significant deterioration in surrounding intersections. Stanford contributes significantly to existing traffic loads and the DEIR indicates that those impacts will increase dramatically. In addition, their reliance on increased train capacity to meet trip reduction goals depends on Caltrain electrification that is expected to increase rail-down time at crossings with major impacts on east-west traffic flow. The nexus between Stanford's traffic impacts and mitigation reliance on significantly greater Caltrain capacity suggests that adequate mitigation would include contribution to the costs of grade separation at affected intersections.

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OTHER

Finally, given Stanford's ongoing and growing land use impacts on our increasingly dense community, land use planning certainty is an increasingly valuable commodity. I urge you to revisit consideration and determination of a maximum build out for Stanford and permanent preservation of Stanford lands outside the academic growth boundary as open space.

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Thank you for your consideration.

Sincerely,

Jennifer Hetterly

[REDACTED]
Palo Alto, CA 94303

5.2.3.69 Responses to Comments from Jennifer Hetterly

- I-Hetterly-1 Regarding the general comment made about affordable housing, school and transportation impacts, each of the specific issues raised by the comment in this letter are addressed in the individual responses to the comments that follow.
- I-Hetterly-2 The housing issues raised in this comment are largely socioeconomic issues not required to be analyzed in the Draft EIR or mitigated under CEQA. However, please see Master Response 6: Affordable Housing, Topic 6: Regional Housing Needs Assessment Affordable Housing Credit. Nonetheless, the Draft EIR Section 5.15 addresses all Project and contribution to cumulative effects on VMT and traffic, and mitigates those effects to the extent feasible.
- I-Hetterly-3 With respect to student generation rates and cumulative impacts, refer to Master Response 9: Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- With respect to consideration of cumulative impacts on student enrollment by Stanford and by Palo Alto's updated Comprehensive Plan, please see Response to Comment A-PAUSD2-7.
- With respect to issues raised by the Palo Alto Safe Routes to School letter (included as Attachment B in the comment letter from the Palo Alto Unified School District, and again in Letter I-Lungren), including on traffic and safety, please see Response to Comment A-PAUSD1-10 and Response to Comment A-PAUSD1-29; Master Response 12: Public Schools, Topic 2: Additional School Site; Master Response 13: Transportation and Traffic, Topic 9, Design Hazards and Safety Impacts; and Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.
- I-Hetterly-4 The Level of Service methodology used to evaluate traffic operations 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 the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).
- With respect to the Marguerite shuttles, as a privately operated shuttle, the shuttles can be expanded and contracted to meet the demands on the system at any point in time. As such, a capacity analysis is not warranted.²⁷

²⁷ The annual traffic monitoring reports that are prepared by the County are available on their website at <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Archive.aspx>. These documents provide the raw cordon data and Marguerite ridership by route that was used to apply for credits.

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic, and 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 in the future.

- I-Hetterly-5 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.

Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.

- I-Hetterly-6 The City of Palo Alto is studying multiple scenarios related to grade separation and is not expected to have a preferred scenario until early-2019, which would then trigger a need to commence environmental review in 2019.²⁸ Pursuant to CEQA Guidelines Section 15127.4(D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such intersection improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area. Also, please see Response to Comment I-Hetterly-5.

- I-Hetterly-7 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.

²⁸ Palo Alto City Council Staff Report ID #9100 April 16, 2018.

Comment Letter I-Hickey

From: [Karen Ambrose Hickey](#)
To: [Rader, David](#)
Subject: Stanford University General Use Draft EIR
Date: Sunday, January 21, 2018 6:07:28 PM

Hello Mr. Rader,

I am opposed to such a large increase in capacity. Our current roads are already beyond normal capacity throughout Palo Alto. I live just off Embarcadero and the traffic going to Stanford and out in the mornings and evenings cause gridlock, speeding and congestion that our residential areas cannot and should not support.

For example, I run to campus or in the area at 6 am. I watch first-hand the cars that speed down Embarcadero (this is a residential street), run lights, tailgate and crowd cross-walks as they head into the Stanford campus. This has gotten worse over the last 5 years. Forget trying to get my kids to Palo Alto High School on a rainy day. The parents are stuck in gridlock.

A few months ago, we had a fatality on Oregon Expressway. Granted, all the traffic was not Stanford, but the diverted traffic was sent through the streets of Palo Alto, making it impossible to get kids to school. Parents had to drop kids off on corners and hope that they could make a run for it.

I appreciate the effort that Stanford has made with electric vehicles, the Marguerite, etc., but the reality is that people are commuting further distances and they are not all using the buses. Residents are suddenly finding that their once-quiet street is now a "cut-through" for desperate commuters or residents trying to avoid the traffic. My street has become one of those.

Please consider a scaled back plan. I am a Stanford alumni and love the campus and the facilities; however there has been non-stop growth. Bigger buildings replacing smaller ones and new buildings where there was nothing. My classmates don't recognize the campus.

Thank you for your consideration.

Best regards,

Karen Hickey
[REDACTED]
Palo Alto

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5.2.3.70 Responses to Comments from Karen Hickey

I-Hickey-1 Concerns about existing traffic congestion in Palo Alto are noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, the proposed Project would not contribute additional peak hour traffic to Palo Alto roadways. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

Comment Letter I-Hirota

From: [Kimiko Hirota](#)
To: [Rader, David](#)
Subject: Provide affordable housing & transportation
Date: Tuesday, January 30, 2018 8:16:11 PM

Dear David Rader, Mr.

Dear Mr. Rader,

Tell our county representatives to insist that Stanford provide affordable housing and transportation options for the service workers who make the University run and help improve housing and transportation for all Bay Area working families! THIS FRIDAY, FEBRUARY 2ND, is the deadline to comment on Stanford's Environmental Impact Report on planned expansion.

Our representatives are reviewing the report as part of Stanford's application for a General Use Permit (GUP) that would allow the University to expand more than 2 million square feet through 2035. We have many concerns, most notably that the EIR contains no commitment to house Stanford's low-wage service workers, who struggle to survive in the Bay Area housing market and commute hours each way from less expensive parts of the state with detrimental effects on their families, traffic, and the environment. The Stanford and South Bay communities are coming together because we know the University can do better.

We have serious concerns about the draft EIR, and now, before THIS Thursday, February 1st at 5:00 pm, all of us have the chance to raise our concerns with our County representatives!

AFFORDABLE HOUSING:

Stanford does not plan to provide enough housing to accommodate the population growth, with a shortage of 762 housing units between now and the end of the GUP period.

Stanford fails to prioritize housing for its own staff and workers.

Stanford is proposing to pay an affordable housing fee that is much lower than the actual fee needed to offset impacts. \$20 per square foot is their proposed fee, compared to \$264 from Palo Alto's study and \$177 from SCoPE2035's calculations.

TRANSPORTATION AND ENVIRONMENT:

The Environmental Impact Report only studies the peak commute hours, which provides a limited snapshot of Stanford's traffic impacts.

Stanford has failed to and does not plan on providing P&TS (Parking and Transportation Services) benefits to all workers, including contracted workers.

Stanford has not identified pathways or set goals to reduce greenhouse gas emissions beyond business as usual. Many communities have a stake in the outcome of the GUP process. There are numerous additional concerns beyond the ones listed above that have been expressed from community members. A lot of local residents share the concern that the environmental impact report fails to accurately capture and address the impacts of this development. It is important to write comments to the county so that the EIR accurately reflects the impacts of Stanford's expansion so that the county has legal leverage to ensure equitable, responsible, and sustainable development.

Sincerely,

Kimiko Hirota



Stanford, CA 94305

5.2.3.71 Responses to Comments from Kimiko Hirota

I-Hirota-1 Due to lack of specificity in the comment, no specific response is possible; however, please see individual responses that follow.

I-Hirota-2 Please see Master Response 9: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

In addition, on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

I-Hirota-3 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

Third-party contractors include some janitorial staff, some food service and daycare workers, and construction contractors. These non-Stanford affiliates are eligible for TDM incentives and enrollment in the Commute Club if sponsored by a university department or campus organization. Sponsors must confirm each individual's Stanford affiliation and on-campus worksite address and certify the hours and duration the individual is or will be at that address for official university business. Non-Stanford affiliates registered for TDM incentives work at retail outlets, childcare centers, cafes and restaurants on campus, UG2 Janitorial Services, Stanford Credit Union employees, employee agencies (i.e., Option1, Slingshot and Manpower), and Wells Fargo Bank. Contract and subcontract workers can be sponsored as part of this program. Other TDM programs, such as bicycling to campus and the Marguerite shuttle, are free to both Stanford and non-Stanford affiliates.

Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for detail on the TDM program, including specific programs for which third-party contractors are eligible.

With respect to the comment regarding greenhouse gases, Sections 5.7, Greenhouse Gas Emissions addresses all Project and cumulative effects on air greenhouse gases associated with the construction and operation of the proposed Project pursuant to resource agency significance thresholds.

Comment Letter I-Hitchings

From: [Hamilton Hitchings](#)
To: [Rader, David](#)
Cc: stephen@stanford.edu; [Supervisor Simitian](#); [City Council](#); [Kumar, Kavitha](#); jmccown@stanford.edu; Planning.Commission@CityofPaloAlto.org; [Elena Lee](#); [Elaine Costello](#); [Hillary Gitelman](#)
Subject: Stanford GUP Draft DEIR Input from Hamilton Hitchings, Palo Alto Resident
Date: Saturday, November 25, 2017 3:37:58 PM

To: David Rader, Department of Planning and Development, County of Santa Clara

Cc: Palo Alto City Council, Palo Alto Planning and Transportation Committee and Palo Alto Planning Department

Stanford is one (if not the) best Research University in the world and while I support the Stanford GUP, that support is conditioned on Stanford fully mitigating their growth impacts. Thus, I encourage the Santa Clara County Board of Supervisors to impose the following requirements as conditions of approval of Stanford's 2018 GUP.

- Stanford's development should not make the regional traffic crisis worse. The existing 2018 GUP language merely continues existing TDM programs and is not a commitment to no new net car trips. Stanford should not get trip reduction credits for off-site bicycle improvements. Rather the effectiveness of these programs should be measured on whether they actually achieve no new net car trips. Thus, Stanford's net car trips should not increase both during peak and non-peak hours. This should be verified at least every quarter on the estimated busiest day. Current fee penalties for exceeding no new trips are insufficient and should be sufficiently high to force Stanford to immediately mitigate the overage in that same year.
- Stanford is relying heavily on increased Caltrain ridership to offset increased car trips. The GUP should not over-estimate mitigations for transportation alternatives such as Caltrains. Caltrain is already at capacity and Caltrain electrification & modernization may not generate the increased capacity it has estimated. In addition, many other cities and organizations are relying on this increased capacity for their own growth and double counting of capacity may be occurring. Careful and accurate analysis of the actual increased capacity and number of additional Stanford riders who can and will use Caltrain should be included in the GUP including competing demands for this capacity from other cities and companies up and down the peninsula.

This web page below on the Caltrain website that show the increase from electrification will result in a 10% increase in peak hourly passenger capacity:

<http://www.caltrain.com/projectsplans/CaltrainModernization/Modernization/PeninsulaCorridorElectrificationProject/Capacity.html>

- Given CalTrain's limitations I suggest Stanford set up long-distance commute buses similar to the ones Google and other big companies have. And maybe those could serve not only the campus and hospital but also the research park and Downtown and Cal Ave firms. The county could make that a GUP mitigation and require that that non-Stanford riders be billed no more than Stanford riders.
- Stanford cannot continue to grow indefinitely without seriously compromising our quality of life on the Peninsula. The County should establish a maximum build-out for the University. Under the 2000 GUP, Stanford was required to study the maximum build-out potential for its campus in its Sustainable Development Study, but failed to do so.
- The proposed academic development under the GUP should not make the regional housing shortage worse. Stanford should be required to provide housing on campus or on Stanford lands for the influx of new students, faculty, staff and contract workers.

Comment Letter I-Hitchings

- Stanford should be required to adopt a policy of carbon neutrality for all new construction.
- In exchange for the higher density of development on campus, the Stanford foothills outside of the Academic Growth Boundary should be preserved as permanent open space forever and not expire in 2025.
- It is likely that this plan will cause increased runoff from Stanford campus into San Francisquito Creek resulting in increased likelihood of flooding and potential future damage. I would request Stanford generate no increase in runoff during major storms. Also, Stanford has done an excellent job of studying the Searsville dam as a possible source of downstream flooding and it would be great if a commitment to that project was part of the GUP as a mitigation.

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By taking these steps listed above, Stanford can grow sustainably and mitigate its local growth impacts as it expands.

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Hamilton Hitchings, Palo Alto Resident

5.2.3.72 Responses to Comments from Hamilton Hitchings

I-Hitchings-1 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic, and 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 in the future.

I-Hitchings-2 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.

Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.

I-Hitchings-3 Stanford, through its transportation demand management program, prioritizes support for public transit rather than operating its own fleet of long-distance buses. Currently, Stanford supports public buses from the East Bay and provides transit passes to employees to encourage use of public transit. Stanford staff works directly with public transit agencies to optimize access to campus by providing data for ridership modeling and having operation discussions with agency staff. At the Stanford Research Park, Stanford has initiated a partnership with Research Park employers to test the effectiveness of private bus lines. Stanford could elect to include this type of approach as part of an expanded transportation demand management program at the campus if it proves to be necessary to achieve the no net new commute trips standard, particularly if public transit systems do not reach a specific destination where Stanford affiliates are concentrated.

I-Hitchings-4 Regarding comments on effects of growth on quality of life, please see Master Response 1: Non-CEQA Comments.

With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

I-Hitchings-5 Please see Master Response 6: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund. In addition, on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

- I-Hitchings-6 This comment requests that the County adopt a policy of carbon neutrality for all new construction. This is a policy matter for the County Board of Supervisors to consider. Section 5.7 of the Draft EIR analyzes the Project's GHG emissions consistent with CEQA requirements.
- I-Hitchings-7 Mitigation measures are identified in the Draft EIR to mitigate significant impacts of the proposed 2018 General Use Permit. No specific Project or cumulative impacts are identified in the Draft EIR that require permanently setting aside open space land as mitigation for increased density on-campus. However, these comments are part of the public record on the Project, and will be considered by the County decision-makers prior to Project approval.
- I-Hitchings-8 Regarding Project effects on flooding from increased runoff from the Stanford campus, 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.
- I-Hitchings-9 A general comment is made that Stanford can grow sustainably and mitigate its local growth as it expands. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Comment Letter I-Holman

From: [Karen Holman](#)
To: [Rader, David](#)
Subject: Stanford GUP DEIR comments
Date: Friday, February 2, 2018 4:49:53 PM

Good afternoon, and thank you for accepting my comments.

My comments immediately below have to do with how and why the General Use Permit is considered differently from a General Plan such as a City might adopt.

I understand the General Use Permit is considered a “Project” while a City’s General Plan/Comprehensive Plan is evaluated as a “Plan”.

The different criteria used to evaluate the two have specific and general impact on how the analysis is considered and the resulting . As an example, the air quality impacts are evaluated using different criteria. While Palo Alto’s Comprehensive Plan, for instance, determined there would be a Significant Unmitigatable Air Quality Impact, the Stanford proposed GUP does not make such a finding even though the amount of development is several times greater.

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Notwithstanding the word “Permit” in General Use Permit, please explain in detail why the GUP is a Project as opposed to a Plan. This is especially and seemingly inconsistent given the impacts of individual projects that might come forward as a result of the GUP’s approval would have to be evaluated, similar to how individual projects would have to be analyzed that are anticipated by a Comprehensive Plan.

Green House Gas Impacts

Separately, Section 5.2 also indicates that the impacts of demolition and construction to be local in nature. As indicated below and referenced in Section 5.7 (although the analysis is not inclusive) there are considerably broader GHG impacts beyond the local environment.

The proposed 2.275 million square feet of development alone (not including housing and other ancillary uses) creates the demand and thus the manufacturing and transportation impacts of 71 tons of materials upstream needed to create each ton of construction material. Said another way, the materials manufactured to build 2,275,000 sq ft of buildings emit 85,312.5 tons of CO₂.

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This impact is not referenced or analyzed and given Stanford’s strong environmental programs, should be going even further than State requirements. Please provide the complete picture of GHG impacts resulting from construction activities identified in the proposed GUP which would include the full life cycle of demolition through construction. Operational impacts and advantages should be considered in light of these impacts.

Cultural Resources

It is not clear from Section 5.4.2 whether the Historic Resources evaluation conducted by Stanford was peer reviewed or not. Please confirm that peer review was conducted.

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When did the County HHC last update its Heritage Resource Inventory including buildings on Stanford lands? When was the latest addition made on Stanford lands?

Comment Letter I-Holman

Further, for any potential impact on an historic or potentially historic or archaeological resource, the analysis of cultural resource eligibility and any potential impact should be conducted by a qualified professional at Stanford's expense (as they have offered) and peer reviewed by Stanford should they so desire. This was not done in the 2000 GUP as I read it, and that process is not appropriate method to ensure objectivity and transparency for the public.

The Mitigation Measures listed on Page 5.4-21 are inadequate given that there is no mitigation for the loss of an historic resource. It is not possible to replace a new cultural resource with a new one as that is counter to any logic. Age and historic significance cannot be applied to a new structure.

Thank you for taking my comments.

Karen Holman
Palo Alto City Council member

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5.2.3.73 Responses to Comments from Karen Holman

I-Holman-1 As discussed in the Draft EIR, Stanford’s 2018 General Use Permit would provide for substantial reductions in its transportation sector (the primary operational emissions source). The 2018 General Use Permit operational air emissions reflect Stanford’s commitment that all Marguerite buses will be electric vehicles by 2035 and 70 percent of Bonair vehicles will be electric vehicles by 2035, which results in substantial decreases in transportation-related emissions (e.g., NO_x would decrease from 54 to 15 tons per year from 2018 to 2035). The air quality operational emissions analysis in the Draft EIR for the 2018 General Use Permit is based on source specific data, whereas the modeling conducted for the Palo Alto Comprehensive Plan operational emissions was estimated using more generic regional trip and source assumptions.

The comment also incorrectly claims the amount of development assumed under the 2018 General Use Permit is many times greater than that anticipated by the Palo Alto Comprehensive Plan. This is a mischaracterization, as the Preferred Scenario adopted by the City for its Comprehensive Plan included more new housing (3,545 to 4,420 new housing units in the city by 2030) than that proposed at Stanford under its 2018 General Use Permit (3,150 units/beds), and anticipated up 1.7 million square feet of new office and research and development uses (excluding the 1.3 million square feet approved for the Stanford University Medical Center expansion), compared to the 2.375 million square feet of academic and academic support uses proposed under the 2018 General Use Permit at Stanford.

Regarding the definition of the GUP as a “project,” please note that CEQA’s definition of “project” is very broad, and encompasses a wide variety of local government discretionary approvals. See CEQA Guidelines Section 15378.

I-Holman-2 The Draft EIR Air Quality Setting section pages 5.2-4 to 5.2-5 correctly states that demolition and construction activities are sources of PM₁₀ that are more local in nature, while other sources, such as vehicular traffic, have a more regional effect. However, Project construction emissions are addressed in the Draft EIR Air Quality section in different contexts. Draft EIR Impact 5.2-1 addresses the contribution of Project construction emission of NO_x, PM, and ROG_s to the air basin pursuant to the BAAQMD’s criteria air pollutants thresholds. Draft EIR Impact 5.2-2 addresses effects of localized increases in particulate matter as a result of Project construction. Draft EIR Impact 5.2-3 considers localized construction related emissions of TACs and PM_{2.5} that could expose sensitive receptors to substantial pollutant concentrations or health risks.

With respect to the request to address lifecycle emissions in the Draft EIR Greenhouse Gas Emissions section, please refer to Response to Comment I-Graves-7.

I-Holman-3 The comment questions whether Stanford’s historic evaluation was peer reviewed, when the County’s Historic Heritage Commission last updated its inventory, the evaluation process for determining eligibility, and the effectiveness of Mitigation Measure 5.4-1.

Under the 2000 General Use Permit, there was no comprehensive survey of historic buildings at Stanford. Instead, as each demolition or modification of a building 50 years old or older was proposed for approval, the individual building project was analyzed to determine whether the demolition or modification could result in a significant adverse effect to historic resources. Each of these analyses was prepared by one or more qualified professionals, and, in some cases, the County also required peer review of the evaluations by a second qualified professional.

In connection with its application for the 2018 General Use Permit, Stanford prepared and submitted a comprehensive Historic Resources Survey. The Survey was prepared by qualified professionals at Stanford. In addition, peer review of the Historic Resources Survey was conducted by a qualified professional at ESA that meets the Secretary of the Interior’s Qualification Standards for Architectural History; peer review comments were incorporated into the final survey document that was re-submitted by Stanford in May 2017 (see Draft EIR Appendix HIS). The Historic Resources Survey page i includes a summary section that highlights the changes made as a result of the peer review conducted by the County’s independent expert consultant.

The peer-reviewed Historic Resources Survey will form the basis for evaluations of proposed building demolitions and modifications under the 2018 General Use Permit.

The Historic Resources Survey determined the potential eligibility for listing on the California Register for buildings built before 1975; a supplemental survey will be submitted in 2025 for building built between 1976 and 1985.

Mitigation Measure 5.4-1(b) on page 5.4-21 of the Draft EIR addresses demolition of an eligible resource. For any building project that involves demolition of an historical resource that is listed or has been identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey or Survey Addendum, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared as part of the CEQA environmental review of the project. Consistent with the County’s process the analysis of project impacts, alternatives and mitigation will be referred to the Santa Clara County Historical Heritage Commission for its recommendation prior to approval.

On Draft EIR page 5.4-23, the potential impact to historical resources is determined to be Significant and Unavoidable after mitigation because the loss of

a historic resource cannot be mitigated to a less-than-significant level. Further, no mitigation can be identified for demolition of a historic resource in the absence of specific information about the resource itself.

The Countywide Historic Context Survey was updated in 2012 and includes a discussion of Stanford University.

From: [Ginger Holt](#)
To: [Rader, David](#)
Subject: Stanford EIR
Date: Friday, February 2, 2018 6:03:52 PM

Mr. Rader,

I strongly support the terms outlined in the petition you will be receiving. So many of us in the communities surrounding Stanford are already dramatically affected by their growth in process. Most of us have not yet figured out workarounds to deal with the traffic (and other impacts) to try to recapture the quality of life we have invested in and no longer have here. The prospect of additional growth is mind boggling.

Two critical needs are to develop meaningful metrics for the regional impacts of the proposed development, and to conduct real traffic measurements. The net new vehicle trips as outlined have marginal value, and in no way reflect what we will experience.

Thank you, and finally, again, please support the terms of the petition.

Ginger Holt

Petition to the Santa Clara County Board of Supervisors Regarding the 2018 Stanford GUP.

Stanford University has requested the right to add 3.5 million square feet of new development on campus over the course of its 2018 General Use Permit (GUP), which will guide development through 2035. This amount of development is the equivalent of two-and-a-half Stanford Shopping Centers. We are concerned about the potential impacts of such a large amount of growth over a relatively short period of time. We encourage the Santa Clara County Board of Supervisors to impose the following requirements as conditions of approval of Stanford's 2018 GUP.

- Stanford cannot continue to grow indefinitely without seriously compromising our quality of life on the Peninsula. The County should establish a maximum build-out for the University. Under the 2000 GUP, Stanford was required to study the maximum build-out potential for its campus in its Sustainable Development Study, but failed to do so.
- In exchange for the higher density of development on campus, the

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Stanford foothills outside of the Academic Growth Boundary should be preserved as permanent open space.

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- The proposed academic development under the GUP should not make the regional housing shortage worse. Stanford should be required to provide housing on campus or close by for the influx of new students, faculty, staff and contract workers.
- Stanford’s development should not make the regional traffic crisis worse. Every new automobile trip generated by the GUP should be offset by the removal of a trip, both during peak and non-peak hours. Furthermore, the 2018 GUP should require no net new parking spaces on campus.
- Stanford should be required to adopt a policy of carbon neutrality for all new construction.

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Ginger Holt



5.2.3.74 Responses to Comments from Ginger Holt

- I-Holt-1 Comments are made regarding the Project effect on quality of life; these comments do not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.
- General comments are made regarding traffic, and the no net new commute trips standard. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- I-Holt-2 No changes to existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.
- Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Holt-3 Draft EIR Section 5.12 Population and Housing addresses all Project and cumulative population and housing impacts associated with the construction and operation of the proposed Project.
- Please also 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).
- 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.
- I-Holt-4 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

The comment regarding parking is noted, but does not address the adequacy of the Draft EIR. Please refer to 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, which includes the strict conditions for which parking would be expanded beyond the limit approved in the 2000 General Use Permit.

I-Holt-5 This comment requests that the County adopt a policy of carbon neutrality for all new construction. This is a policy matter for the County Board of Supervisors to consider. Section 5.7 of the Draft EIR analyzes the Project's GHG emissions consistent with CEQA requirements.

Please also refer to Response to Comment I-Drekmeier-15 regarding the significance criteria used to judge the Project contribution to GHG emissions, and the conclusions that these impacts would be less than significant.

Comment Letter I-Holzemer

From: [holzemer/hernandez](#)
To: [Rader, David](#)
Subject: Fwd: Stanford GUP Comments
Date: Saturday, February 3, 2018 12:22:03 AM

Dave,

I sent this message today to you (on time -- see time stamp below), but I found out it bounced back to me.

I'm resending it and hope you will please include it in the DEIR comments. Thank you.

Sincerely,

Terry Holzemer

----- Original Message -----

Subject: Stanford GUP Comments
Date: 2018-02-02 15:45
From: holzemer/hernandez [REDACTED]
To: dave.rader@pln.sscgov.org

Dear Dave,

Below are comments on the Stanford GUP. Please include them in the DEIR analysis.

One more thing: when do you believe this item will come up for first discussion at the Board of Supervisors Meeting? I would wish to be there and voice my opinions at the meeting. Please keep me posted.

Sincerely,

Terry Holzemer

[REDACTED]

Palo Alto, CA 94306

Stanford GUP Comments

The Stanford GUP proposal is a massive, new development plan that Stanford University is claiming is needed to "remain a world-class university". This is only a "smoke-screen" to tell the public that they want to build more buildings, have more people commuting to campus, and entirely stress out the current local infrastructure -- especially here in Palo Alto -- to deal with these huge changes.

I encourage the County to reject the current Stanford GUP proposal as too massive, adding to many people to an already overcrowded infrastructure of roads and intersections that truly can't handle any more traffic in the communities around the campus.

Under Stanford's 2018 General Use Permit, the projected growth of the University campus (2018-2035) has a

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Comment Letter I-Holzemer

number of traffic impacts on local intersections and freeways that even after suggested mitigations remain ‘Significant and Unavoidable’.

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A key issue is whether the EIR sufficiently addresses the full range of congestion and traffic issues raised by the 2018 General Use Permit application and adequately assesses the realistic options available. Let us look at five specific issues that may bear special attention:

1. Geography. Stanford lies within a fairly narrow band of intense development on the San Francisco Peninsula. Stanford and the surrounding communities of Palo Alto, Menlo Park and Mountain View are located in a fairly narrow five mile strip of land geographically bounded by the San Francisco Bay immediately to the east and the heavily protected open space lands of the Santa Cruz Mountain foothills to the west. This restricts the vast majority of inbound commute traffic to the Dumbarton Bridge and five north-south highway corridors where access ramps and intersections are already experiencing significant delays.

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1. The underlying expansion of jobs over housing. With the limited developable land, the growth of Silicon Valley (with Stanford’s unique role in the center of that growth) and the underlying business dynamic that thrives on small and large firms in close proximity means that new non-residential office and meeting space has been expanding much faster than new housing. The current situation in and around Stanford involves a very high ratio of jobs to employed residents and a subsequent dependence on a very high and growing commute base. In fact, Palo Alto has a current ratio of three jobs in the city to every employed resident, one of the highest in the country among cities of over fifty thousand. The Stanford campus has a similar ratio of close to three student/faculty/workers for every on-campus resident (*Stanford GUP*, Tables 5.12-4-6). The recent expansion of the global headquarters campus of Facebook in Menlo Park and Google in Mountain View will exacerbate that ratio. The Transportation Analysis Appendix forecasts rapid unbalanced growth in the surrounding communities: over the years 2016-2040 it forecasts that the ratio of new jobs will grow four times as fast as new households in Palo Alto and 3.5 times as fast in Menlo Park (*Stanford GUP*, *Transportation Impact Analysis Part 2, Forecasting Report, Tables 4-4 and 5.3*).

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1. Stanford’s role. Stanford will have a major role in this growing regional imbalance of jobs to employed residents. Only thirty percent of new off-campus Stanford household increases will be accounted for in Palo Alto, Mountain View and Menlo Park. This will lead to substantial longer distance commuting (*Stanford 2018 GUP*, page 5.12-17 and Table 5.12-11). Further, between 2018 and 2035, Stanford will be adding approximately 5.7 million square feet of non-residential square footage on the campus and on other nearby lands controlled by Stanford. That includes the 2.3 million expansion of non-residential space on campus included in the GUP, 1.3 million in the Stanford University Medical Center (already under construction and due to come online over the next few years), 0.8 million new square feet of targeted expansion in the adjacent Stanford Research Park, and the 1.3 million square feet new campus business center in Redwood City just five miles from campus. With under 4000 new housing units planned on Stanford lands in these areas that is sure to raise the already high jobs to employed resident ratio dramatically in and around the campus and lead to longer commutes.

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1. Rail as the answer: With so many cars on the highways bringing commuters from ever lengthening distances (and slow buses using the same routes), rail is identified as the potential solution. The EIR states that “the CEQA Guidelines include a presumption that development projects that are located within one-half mile of an existing major transit stop will not cause a significant transportation impact” (*Stanford GUP*, page 5.15-37). In fact, the EIR proposes that the Stanford TDM solution would be to switch drive alone commuters in single occupancy vehicles (SOV) to Caltrain ridership (page 5.15-156). But this ignores current Caltrain limitations. The rail line runs through a portion of a narrow land corridor in which jobs radically outnumber residences with many stations close to job centers surrounded by built out suburban landscapes. Further, the

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Comment Letter I-Holzemer

current rail system is at capacity and expanding the frequency of trains and the numbers of cars will mean extensive blocking of the critical east-west corridors that bring cars, shuttles and bicyclists from commute corridors to job centers. Expensive grade crossings and rebuilding of platforms are needed to make this work. The EIR does not address the obvious need for funding for upgrading the Caltrain infrastructure.

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1. No Net New Commuter Trips: Stanford has set a major goal of keeping all campus commute trips at the level measured in 2001 despite its growth in campus activities. The County is responsible for measuring such activity annually. But the GUP allows Stanford to offset any net new trips to the campus by earning credits through reducing the number of trips in the areas surrounding the campus (page 5.15-88). If the reductions don't lower the net new trips to zero, Stanford would then have to pay a fee (page 5.15-90). But it is hard to find concrete details on the cost and effectiveness of specific credits. For example, one source of credits is the Stanford Commute Club (*GUP Trip Credits: Guideline 3 Commute Club Members*). This club pays employees of Stanford Hospital and Clinics and Welch Road buildings (which are off-campus) for utilizing non SOV modes so the University can earn offset credits (page 3). But these employees are already earning credits for such non-SOV travel through the SUMC mitigation with the City of Palo Alto. Are these credits being double-counted? Another source of credits are to park automobiles on Stanford land outside the campus cordon and bus people to campus. This keeps cars from the campus but does not reduce traffic on the highway corridors. Detailed trip credit information and its impacts on surrounding corridors should be readily available for all interested parties.

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The County's examination of the EIR should include a broad look at the geographical context of the proposal, at Stanford's interest in parcels that happen to be subject to other jurisdictions review, and to the longer-term impacts of costs and quality of life in surrounding communities where existing and future congestion is already a critical issue. Stanford should be willing to pace the growth of all their key parcels inside this area to get reasonable and balanced growth that would support their own priorities and contribute to the health in the overall community that they will continue to live and thrive in. Stanford should be willing to contribute a fair share contribution to essential rail infrastructure.

The County has a responsibility to discuss the wider implications of Stanford's growth across multiple jurisdictions. The County should take into account the needed new rail infrastructure. Lacking substantial Stanford contributions to County Property tax or a fair share contribution for that needed infrastructure, the County must identify who will pay. The County must recognize explicitly in their approval for a greater reliance on rail that the most regressive of local taxes—the sales tax—is not an adequate answer to non-residential growth in an already unbalanced community.

7

We, the citizens of Palo Alto, ask the County to represent us -- stop this massive new development plan and help the citizens for once. Stop being Stanford's "lap dog" and realize that with or without this development Stanford will remain a world-wide, recognized University where folks will want to come to get a great education.

Please keep us informed on what is decided and how our representatives can truly represent its citizens and not the big money interests of Stanford and its friends in the development world.

Thank you.

Sincerely,

Terry Holzemer

[REDACTED]

Palo Alto, CA 94306

5.2.3.75 Responses to Comments from Terry Holzemer

I-Holzemer-1 Certain comments raised here do not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Some general comments are also raised regarding traffic congestion, and effects on the transportation system. 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.

I-Holzemer-2 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.

I-Holzemer-3 Please see Response to Comment A-PV-3.

I-Holzemer-4 Please see Response to Comment A-PV-3.

I-Holzemer-5 The Draft EIR presents information regarding the capacity of the public transit system to accommodate growth in ridership resulting from the proposed Project, but this topic is not treated as an adverse impact. The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity.

The Draft EIR explains on page 5.15-155 that the Governor’s Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for additional detail on Caltrain capacity.

I-Holzemer-6 Community Plan Policy SCP-C8 establishes a policy to “Credit participation in off-campus trip reduction efforts that benefit the streets surrounding the campus towards Stanford’s achievement of the ‘no net new commute trips’ standard.” In 2003, Stanford, the County Planning Office and the County’s transportation consultant discussed potential methodologies for providing credits to Stanford. The County developed a set of draft guidelines, which were reviewed by the Community Resource Group, and the Planning Office approved the final

guidelines on October 9, 2003. These guidelines are presented in the “Stanford Traffic Cordon Count Credit Guidelines” dated October 28, 2003. The County Planning Office provided a revision to the guidelines to the Community Resource Group for review in April 2015, and the Planning Office approved the final revisions to the guidelines in October 2015.

Under the County-approved methodologies, the forms of trip reductions outside the cordon that are currently counted include: 1) Marguerite shuttle riders outside the cordon who are not traveling to a campus destination; 2) Hospital employees in the Commute Club; and 3) Hospital employees on the Stanford-subsidized East Bay bus service. Credits are submitted to the County for review as part of the annual traffic monitoring process and are reviewed by the Community Resource Group.

During implementation of the 2018 General Use Permit, Stanford can request that the Planning Office revise the credit guidelines if Stanford proposes new or different trip reduction credits. The process for revising the guidelines would be similar to the process followed during implementation of the 2000 General Use Permit. Mitigation Measure 5.15-2(5) explains that the County Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate, and the County Planning Office will require that Stanford provide evidence of its participation in the program in a manner that can be independently verified. Similarly, any proposal for credits associated with funding of off-campus circulation infrastructure improvements will be reviewed by the County to determine how and to what extent the infrastructure project would remove vehicular trips from the local impact area. 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.

Trip reduction credits for participation in the Commute Club by Hospital employees do not overlap with mitigation for the SUMC 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.

The comment states that another source of credits is to park automobiles on Stanford land outside the campus cordon and bus people to campus. The only off-site parking that Stanford has that is used for bus commuters is in the East Bay. Buses from the East Bay are getting regional trips off the road.

I-Holzemer-7 Regarding the comment made concerning consideration of Stanford developments in other jurisdictions, 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.

Regarding the comment made concerning costs and quality of life in surrounding neighborhoods, and other comments on socioeconomic issues that that do not address the adequacy of the Draft EIR, please see Master Response 1: Non-CEQA Comments.

Regarding the comment made concerning rail infrastructure, please see Response to Comment, I-Holzemer-5, above.

Comment Letter I-Hung

From: [Emily Hung](#)
To: [Rader, David](#)
Cc: [Supervisor Simitian](#); supervisor.wasserman@bos.sccgov.org; supervisor.chavez@bos.sccgov.org; [Supervisor Yeager](#); city.council@cityofpaloalto.org; planning.commission@cityofpaloalto.org; [Cortese, Dave](#); [Rader, David](#); [Loquist, Kristina](#)
Subject: Opposition to the Stanford 2018 GUP from Palo Alto Resident
Date: Thursday, January 25, 2018 12:08:00 AM

Dear County Supervisors and Staff,

While the community recognizes the University's great intellectual and cultural contribution to the *broader S.F. Bay Area community*, our small city (Palo Alto) can not be expected to endure the impact and costs of the dramatic infrastructure requirements that would be required to sustain the proposed growth at acceptable traffic, environment and safety levels. Stanford must pay for the requisite infrastructure improvements prior to the approval of the 2018 GUP. The institution is growing well beyond our means. I urge you to stop all further development by Stanford until infrastructure and impact analysis is completed and requirements are placed upon Stanford to fund the necessary infrastructure improvements that would make their GUP proposals truly **"no net impact"** to our community. Specifically, we find the following concerns with the 2018 GUP:

- Stanford's proposal should not be considered in isolation of the **significant existing transportation and traffic congestion problems** that the City of Palo Alto is already experiencing given the large imbalance between local jobs vs. locally employed residents. This ratio is one of the highest in the country, and contributes to an already existing traffic dilemma in our small residential community. 1
- University growth should not be considered in isolation given that it is tied to the Stanford University Medical Center (SUMC), the Stanford Research Park (SRP), Stanford Shopping Mall, SLAC, including the development proposed for [500 El Camino Real](#) in Menlo Park (429,000 SF of office, retail and housing). Looking at each site in isolation does not provide a full picture of the cumulative impacts to Palo Alto. 2
- The GUP claim of "No Net New Commuter Trips" is naive given the millions of square feet of development proposed. [Many reports detail the naive and poorly formed aspects of these claims.] 3
- The GUP claims that Caltrain usage will offset growth in daily employee road commuting are naive given that Caltrain is already at full capacity and can only practically address a fraction of total employee commuters. 4
- The GUP totally disregards the looming and alarming transportation and traffic congestion problems that will be created by imminent Caltrain electrification, increased traffic stops, and the likelihood of grade separation construction at various intersections, which will only add to the City's financial and traffic burdens. 5
- The GUP is absent any rigorous traffic impact analysis along the impacted main and secondary impacted corridors already strained by Stanford-bound traffic, including Embarcadero and University, as well as Churchill and Kellogg avenues. 6

We need to stop giving Stanford *carte blanche* rights to development in our community without making them carry the fair share of the financial burden needed to fund Palo Alto's transportation infrastructure that their growth requires. I propose that the County require Stanford to fund the following specific projects to offset their impact **prior to the approval** of the Stanford 2018 GUP: 7

1. Stanford should be required to work with the City on mutually agreeable traffic mitigation solutions.

Comment Letter I-Hung

2. Stanford should be required to fund Caltrain grade separation projects at the Churchill and Embarcadero intersections with Alma given that they're already at capacity and will become unmanageable with the proposed Stanford expansions.
 3. Stanford should be required to fund the construction of pedestrian underpasses at Embarcadero Rd and Palo Alto H.S. given the already precarious danger facing students by Stanford-bound traffic, as well as the traffic congestion caused by the existing light.
 4. Stanford should be required to fund the expansion from 3-lanes to 4-lanes on the 300 yard stretch of the Embarcadero Road underpass, which already causes gridlock at rush hour and will only be further exacerbated with more traffic flowing inbound/outbound of Stanford.
 5. Stanford should be required to pay for the addition of left-turn traffic signals at the intersection of the Embarcadero Road Underpass and Alma road to facilitate the safe onramp/offramp of inbound/outbound traffic to Stanford along the Alma corridor.
- Please hold Stanford accountable for these significant infrastructure investments prior to any approval consideration for the 2018 GUP. The City and County can not endure the proposed growth without holding firm to that requirement.

7
cont.

Thank you for your time,

Emily Hung
Palo Alto Resident

5.2.3.76 Responses to Comments from Emily Hung

- I-Hung-1 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.
- I-Hung-2 With respect to how the Draft EIR accounted for non-Project related Stanford developments, including the Stanford University Medical Center (SUMC), Stanford Research Park, Stanford Shopping Mall, SLAC, and other developments 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.
- I-Hung-3 The comment does not provide any substantial evidence that any of the assumptions or methodologies used in the determination of traffic impacts in the Draft EIR were flawed. The no net new commute trips program, including its methodology, feasibility, and effectiveness, is discussed in detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- I-Hung-4 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.
- Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.
- I-Hung-5 Please refer to Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how the Baseline and Cumulative traffic models were developed to reflect the traffic implications of regional projects. 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 and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary.
- I-Hung-6 The streets and intersections for which traffic impacts were assessed are those that met the intersection criteria for selection as described in Draft EIR Section 5.15.2. As such, Embarcadero Road, University Avenue and Churchill Street are all included in the impact analysis of Section 5.15, Transportation and Traffic of the Draft EIR. Kellogg Avenue is a residential roadway that did not

meet the criteria for inclusion in the intersection impact analysis. See page 5.15-8 of the Draft EIR. Please refer to Master Response 13: Transportation and Traffic, Topic 1: Method for Identifying Study Intersections, Freeway Segments, and Ramps.

I-Hung-7

Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, Mitigation Measure 5.15-2 requires Stanford to pay a fair share contribution towards the intersection improvements needed to reduce the significant impacts of the project. The Santa Clara County Planning Office would use the fair share contribution to fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.

Regarding each of the commenter's proposed mitigation measures, it should be noted that if the no net new commute trips standard is not met, a project proponent is only required to pay its fair share contribution toward intersection improvements (rather than fully fund or construct such improvements) as identified in the Draft EIR. Other projects that contribute to the unacceptable conditions would also be required to make fair share contributions. Pursuant to CEQA Guidelines section 15127.4 (4)(B), mitigation measures must be "roughly proportional" to the Project's impacts.

- Work with Palo Alto: Stanford has a working relationship with Palo Alto City staff and will continue to collaborate on transportation solutions.
- Caltrain grade separation projects at the Churchill and Embarcadero intersections with Alma: The Palo Alto City Council voted to close the Churchill Avenue crossing rather than provide a grade crossing. In any event, the proposed Project would not have a significant impact at Churchill Avenue. 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 #49 and Churchill Avenue and Alma Street is presented as Intersection #57 in the transportation analysis. 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. There already is an underpass at the intersection of Embarcadero Road and Alma; accordingly, that intersection did not meet the criteria for evaluation. Please see page 5.15-8 of the Draft EIR for a description of the methodology used to identify intersections for study.

- Pedestrian underpass at Embarcadero Road and Palo Alto High School: 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. Embarcadero Road at El Camino Real is presented as intersection #48 and Embarcadero Road and Town and County is presented as intersection #82 in the transportation analysis. The Draft EIR finds that the proposed Project would not have a significant traffic congestion impact at the two intersections under 2018 Baseline with Project conditions. Under 2035 Cumulative with Project conditions, the proposed Project would have a significant impact at intersection #48 (El Camino and Embarcadero Road) and a less-than-significant impact at intersection #82. If Stanford does not meet the no net new commute trips standard, it would be required to contribute fair-share funding to the addition of a second northbound left-turn lane, at the signalized intersection of El Camino Real / Embarcadero Road. The Draft EIR explains that these improvements would not have a substantial adverse effect on bicycle and pedestrian quality of service. Construction of a pedestrian underpass at Embarcadero Road and Palo Alto High School would not mitigate a significant impact of the proposed Project. However, to the extent that improvements could increase use of pedestrian and bicycle travel modes, Mitigation Measure 5.15-2 enables Stanford to propose and seek trip reduction credits for these types of improvements.
- Expansion of the Embarcadero Road underpass from 3-lanes to 4-lanes: The City Council has yet to vote on this proposal, but expanding the Embarcadero Road Underpass from 3 to 4 lanes is not presently viewed as a favorable solution. In any event, the proposed improvement would not reduce a significant impact of the proposed Project.
- Addition of left-turn signals at the intersection of the Embarcadero Road underpass and Alma: 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. Embarcadero Road at El Camino Real is presented as intersection #48 and Embarcadero Road and Town and County is presented as intersection #82 in the transportation analysis. The Draft EIR finds that the proposed Project would not have a significant traffic congestion impact at the two intersections under 2018 Baseline with Project conditions. Under 2035 Cumulative with Project conditions, the proposed Project would have a significant impact at intersection #48 (El Camino and Embarcadero Road) and a less-than-significant impact at intersection #82. If Stanford does not meet the no net new commute trips standard, it would be required to contribute fair-share funding to the addition of a second northbound left-turn lane, at the signalized intersection of El Camino Real/Embarcadero Road.

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.

Comment Letter I-James

From: [Donna James](#)
To: [Rader, David](#)
Subject: Public Meeting Regarding Stanford Draft EIR
Date: Tuesday, November 14, 2017 10:22:53 PM

Dear David,

I live in Ladera, unincorporated Menlo Park, San Mateo County. I am unable to make tomorrow's meeting but want to register my concerns with you.

I object to the loss of open space, the negative visual impact that it has on our the character of our community. It is urban sprawl that should be checked.

1

The light pollution from the buildings at night -particularly those in parking lots on buildings that are empty at night- has ruined the views that I see from my windows forever. Even with the shades closed the light now glows through. They are bright, glaring, orange lights that can be seen from miles away.

2

The buildings Stanford has built in the hills- the athletic buildings-look like prisons in the distance. I have to see them from my house now. Very large, ugly and obtrusive in the landscape.

3

Stanford has enough athletic and cultural event spaces. I don't want to see a sprawl of more buildings with a vague promise that some day I might go in them. They are for an exclusive group of people at a cost to neighbors.

4

Stanford has collected millions of charitable dollars from citizens in our local community. I would appreciate them not building monuments to ego and increasingly expanding their presence.

Please let my concerns be heard.

Thank you for your assistance.

Best,

Donna James

5.2.3.77 Responses to Comments from Donna James

I-James-1 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 5.1, Visual and Scenic Resources which addresses all Project and contribution to cumulative aesthetic impacts associated with the construction and operation of the proposed Project.

I-James-2 Please refer to Response to Comment O-SCAS-3 for a description of Stanford's lighting guidelines to reduce off-site illumination.

I-James-3 It is not clear what buildings in the hills are being referred to in the comment. Although the 2000 General Use Permit contemplated up to 15,000 square feet of new academic and academic support facilities outside of the Academic Growth Boundary, Stanford has limited new square footage outside the Academic Growth Boundary to a small gatehouse near the Dish Trail and restoration of an existing brick building on the campus side of Junipero Serra Boulevard. No development is proposed outside the Academic Growth Boundary under the proposed 2018 General Use Permit.

In any case, the personal opinions made in this comment address existing conditions and do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-James-4 A personal opinion is made that does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Jones

From: [Patricia Jones](#)
To: [Rader, David](#)
Subject: Stanford's GUP
Date: Monday, January 22, 2018 12:07:41 PM

In our opinion, it would be irresponsible to allow Stanford to implement its huge expansion without requiring it to participate SIGNIFICANTLY in mitigating the traffic impacts it will surely have on Palo Alto. Their plan concedes that Crescent Park will be impacted by additional traffic. However, Crescent Park is already inundated with traffic, and current levels are already unacceptable. We know, because that's where we live and what we experience on a air basis.

1

Public safety is a major issue here, because emergency vehicles and other kinds of help will be unable to reach citizens in need during periods of total gridlock.

2

PLEASE DO NOT let Stanford off the hook in addressing the traffic issues that their planned expansion will create.

3

Thank you.

Patricia Jones and Larry Jones

[REDACTED]

Palo Alto, CA 94301

5.2.3.78 Responses to Comments from Patricia Jones

- I-Jones-1 The comment does not provide any substantial evidence that any of the assumptions or methodologies used in the determination of traffic impacts in the Draft EIR were flawed. The no net new commute trips program, including its methodology, feasibility, and effectiveness, is discussed in detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- Please also refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for a discussion of how potential impacts to neighborhood streets, including those in Crescent Park, were addressed in the Draft EIR.
- I-Jones-2 Please refer to Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- I-Jones-3 The comment is noted, but does not address the adequacy of the Draft EIR. The comment will be considered by the County as part of the review process.

Comment Letter I-Kahn

From: [Mike Kahn](#)
To: [Rader, David](#)
Subject: Stanford GUP 2018 comment
Date: Friday, February 2, 2018 10:42:05 AM

Dear County Board of Supervisors,

I am significantly concerned with Stanford's GUP plans, especially the serious threat of increasing traffic congestion, worsening the housing shortage, and not following through on previous requirements to study maximum build-out (why has Stanford not been held accountable?).

I am in support of all aspects of this petition:

- Stanford cannot continue to grow indefinitely without seriously compromising our quality of life on the Peninsula. The County should establish a maximum build-out for the University. Under the 2000 GUP, Stanford was required to study the maximum build-out potential for its campus in its Sustainable Development Study, but failed to do so.
- In exchange for the higher density of development on campus, the Stanford foothills outside of the Academic Growth Boundary should be preserved as permanent open space.
- The proposed academic development under the GUP should not make the regional housing shortage worse. Stanford should be required to provide housing on campus or close by for the influx of new students, faculty, staff and contract workers.
- Stanford's development should not make the regional traffic crisis worse. Every new automobile trip generated by the GUP should be offset by the removal of a trip, both during peak and non-peak hours. Furthermore, the 2018 GUP should require no net new parking spaces on campus.
- Stanford should be required to adopt a policy of carbon neutrality for all new construction.

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Thank you for your consideration in this matter.

Sincerely,
Michael Kahn


Palo Alto, CA 94303

5.2.3.79 Responses to Comments from Mike Kahn

- I-Kahn-1 Please see Response to Comment I-Holt-1.
- I-Kahn-2 Please see Response to Comment I-Holt-2.
- I-Kahn-3 Please see Response to Comment I-Holt-3.
- I-Kahn-4 Please see Response to Comment I-Holt-4.
- I-Kahn-5 Please see Response to Comment I-Holt-5.

Comment Letter I-Kaplinsky

From: [Shoshanna Jean Kaplinsky](#)
To: [Rader, David](#)
Subject: traffic concerns
Date: Wednesday, November 22, 2017 6:20:16 PM

I live just off Alpine Rd in Stanford Weekend Acres.

I do not know if you know the area?

We have seen an HUGE increase in traffic over the past five years and it becomes more and more difficult to get out of our roads on to Alpine. Despite the Keep Clear notices which do help marginally when polite people do not block the entrances, the traffic build up is extreme.

The impact on air quality from idling cars, the stress of traffic noise and delays in getting anywhere from our home are extreme as it is. If the proposed plans for many more workers coming into Stanford do not take this into consideration the situation will deteriorate further, Life changes and progress is measured in all sorts of ways which are not healthy ... we need a proposal which provides transport and takes traffic off the roads when such huge increases are proposed.

help!!

--

Shoshanna Jean Kaplinsky



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5.2.3.80 Responses to Comments from Shoshanna Jean Kaplinsky

I-Kaplinsky-1 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.

I-Kaplinsky-2 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR Section 5.2, Air Quality, Section 5.11 Noise and Vibration, and Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative air quality, noise and traffic impacts associated with the construction and operation of the proposed Project, and mitigation that reduces significant impacts to the extent feasible.

Comment Letter I-Karnam

From: [Venky Karnam](#)
To: [Rader, David](#)
Subject: Fwd: Concerns about Stanford GUP
Date: Wednesday, January 31, 2018 5:41:31 AM

Hi David,

I am a resident of Palo Alto and I am very concerned about the massive scale of Stanfords upcoming growth in the next 10-15 years. This will add enormous amount of people and traffic to an already congested area. But the bigger issue in my mind is the fact that Stanford has not committed to do its fair share to alleviate these problems. Can you please take this into account?

1

-Venky


5.2.3.81 Responses to Comments from Venky Karnam

I-Karnam-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR Section 5.12 Population and Housing, and Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative population and housing and traffic impacts associated with the construction and operation of the proposed Project, and mitigation that reduces significant impacts to the extent feasible.

Please also 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).

Comment Letter I-Keehn

From: [Suzanne Keehn](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Friday, February 2, 2018 11:07:50 AM

To the County Department of Planning and Development.

-- The impacts on traffic and congestion will be unavoidable if the Stanford GUP is approved without major changes to the plan.

1

-- Stanford is not just adding non-residential space on their campus but on their surrounding properties as well--2.3 million square feet on the campus; 1.3 million square feet on the Stanford Medical Center area; 0.8 million square feet in the Stanford Research Park; and 1.3 million square feet on their new Redwood City Center. *This means over the next 15 years increased commuters from a total of 5.7 million square feet on new non-residential square footage.*

2

--The area around Stanford--including Palo Alto, Mountain View and Menlo Park--has one of the highest jobs to employed resident ratios of any area in the country and projected growth in the area over the next 20 years, including the new buildings on Stanford properties, *will increase new jobs three times faster than new residences.*

3

-- All this means more long distance commuting, an increasing amount by rail *which is already at capacity.*

4

-- Stanford should commit to *pay their fair share of the needed improvements* to our rail infrastructure, including grade separations, which are critical to move traffic and reduce congestion in Palo Alto.

-- Stanford has set a major goal of keeping all campus commute trips at the level measured in 2001 despite its growth in campus activities. The County is responsible for measuring such activity annually. But the GUP allows Stanford to offset any net new trips to the campus by earning credits through reducing the number of trips in the areas surrounding the campus (page 5.15-88). If the reductions don't lower the net new trips to zero, Stanford would then have to pay a fee (page 5.15-90). But it is hard to find concrete details on the cost and effectiveness of specific credits. For example, one source of credits is the Stanford Commute Club (GUP Trip Credits: Guideline 3 Commute Club Members). This club pays employees of Stanford Hospital and Clinics and Welch Road buildings (which are off-campus) for utilizing non SOV modes so the University can earn offset credits (page 3). But these employees are

5

Comment Letter I-Keehn

already earning credits for such non-SOV travel through the SUMC mitigation with the City of Palo Alto. *Are these credits being double-counted?* Another source of credits is to park automobiles on Stanford land outside the campus cordon and bus people to campus. This keeps cars from the campus *but does not reduce traffic on the highway corridors*. Detailed trip credit information and it impacts on surrounding corridors should be readily available for all interested parties.

5
cont.

I am also concerned that Stanford will need another elementary school, at Stanford, and not pay taxes to support it. Stanford need to commit to the expenses that the much needed school will entail, because of all the additional housing. To send the children to attend schools further away, such as Nixon and Escondido, (already at full capacity) will increase the traffic at peak hours.

6

It has also been shown, as does our experience, when an area insists on continual growth, eventually gridlock is created, and mobility for residents and workers are greatly compromised, and it ends up hurting business as well.

7

Sincerely,

Suzanne Keehn

[REDACTED]

Palo Alto, 94306

5.2.3.82 Responses to Comments from Suzanne Keehn

I-Keehn-1 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

I-Keehn-2 This comment does not address the adequacy of the Draft EIR.

However, 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, regarding how non-Project Stanford development was considered in the Draft EIR.

I-Keehn-3 Please see Response to Comment A-PV-3.

I-Keehn-4 The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity. The Draft EIR explains on page 5.15-155 that the Governor's Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

I-Keehn-5 Please see Response to Comment I-Holzemer-6 above regarding double counting. The Draft EIR (Impacts 5.15-2 and 5.15-9) discusses impacts at area intersections under 2018 Baseline conditions and 2035 Cumulative conditions on pages 5.15-74 to 5.15-95 and pages 5.15-112 to 5.15-136. The analysis considers off-site trip generation in the communities surrounding Stanford as part of the mitigation to reduce the impact.

I-Keehn-6 Please see Master Response 12: Public Schools, Topic 2: Additional School Site.

I-Keehn-7 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.

Comments on Stanford DEIR
Arthur Keller

1. The Transportation Demand Management program in large part relies on the Pre-Tax Commuter Benefits (Vol. 3, PDF page 196). However, the 2017 Tax Act changes the rules. See <https://www.shrm.org/resourcesandtools/hr-topics/benefits/pages/how-tax-bill-alerts-employee-benefits.aspx> The FEIR should consider how tax law change affects the provision of this benefit.

1

2. The No Net New Commute Trips standard allows offsets for participation in trip reduction efforts off campus.

Pursuant to 2000 GUP Condition G.8, Stanford can also receive trip reduction credits for participation by Stanford in off-campus trip reduction efforts. The trip credit is commensurate with the predicted or actual number of trips reduced. Trip reduction must occur in the area between US 101, Marsh Road/Middlefield Road/Valparaiso Avenue continuing directly to the intersection of Sand Hill Road and I-280, and Arastradero Road/Charleston Road. The County Planning Office determines the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate.

2

Vol. 3, PDF page 7.

To the extent that such credits are allowed to continue, these offsets count a reduction twice. Once because of the reduction to the count from the offset. Twice because there is a reduction to the count by having fewer cars across the cordon. Yet there is no double reduction in the traffic in the area immediately surrounding the campus.

Please provide a full and complete accounting of the reductions granted by the County planning office for the 2000 GUP.

3. The analysis fails to consider the impact of traffic intrusion into residential environments due to increased congestion as Waze directs traffic along alternative routes. This problem occurs in neighborhoods surrounding the campus. The analysis performs flawed TIRE analysis that assumes that the ratio of cars traveling through the neighborhood will remain the same. However, as congestion on the main road increases, it is likely that more cars will drive along alternative routes, particularly when so directed by Waze.

3

4. The analysis excludes “[v]ehicles that exit campus within 15 minutes of entering are considered to be making ‘cut-through’ trips and [] from the baseline comparison.” Such exclusion should add back in trips by taxis and transportation network companies, such as Uber and Lyft, as these trips have the purpose of transporting people to campus. Excluding such trips unfairly reduces the traffic counts by two, one for arriving and one for departing. Transportation network companies have been shown to increase congestion in San Francisco and elsewhere and participate in increased congestion related traffic violations. <http://www.sfexaminer.com/sfpd-uber-lyft-account-two-thirds-congestion-related-traffic-violations-downtown/> <http://www.sfchronicle.com/politics/article/Uber-and-Lyft-taking-up-plenty-of-space-on-SF-s-12227931.php> <https://www.citylab.com/transportation/2017/10/the-ride-hailing-effect-more-cars-more-trips-more-miles/542592/> Since it is likely that the use of network transportation company services will increase, it is imperative that these trips not be excluded inbound and outbound. Furthermore, through trips by autonomous vehicles should not be excluded either,

4

Comment Letter I-Keller

because of the potential that they will enter campus, drop off the Stanford worker, and then find a place to park in a Palo Alto neighborhood.

Because of the congestion on the Stanford campus, few drivers will want to enter campus to pass through it during peak hours. Consequently, the only through traffic that should be excluded are those driving to the Stanford Shopping Center or the Stanford Medical Center (and who then do not walk to campus) and are not taxis, autonomous vehicles, or transportation network company vehicles.

4
cont.

5. The Transportation Demand Management program largely relies on increased Caltrain use. However, the analysis fails to demonstrate that the Caltrain capacity exists, given other projected demand for Caltrain use. An analysis of Caltrain use should be done based on existing projected capacity and demand (including at intermediate time points) on each rush hour train run immediately entering and leaving the Palo Alto (University Avenue) and California Avenue stations. This analysis should include other expected increased demand from other developments, such as around the Diridon Station in San José, in Mountain View, Menlo Park, and Redwood City, and other cities.

5

6. Projected student housing is inadequate. By 2020, there will be 13,800 student beds on campus. (Vol. 3, PDF page 140.) However, Table 5.12-9, there are currently 16,613 students plus 2,403 postdoctoral students, projected to increase in 2035 by 2,900 students plus 961 postdoctoral students. (Vol. 1, PDF page 493) However, only 2,600 new units/beds are proposed to be developed for students and no postdoctoral student housing. Considering the impact of housing in the Bay Area and especially in the area surrounding campus, Stanford should provide housing at least for all new undergraduate and graduate students and also for all new postdoctoral students. I would recommend that Stanford provide housing on campus for all undergraduate, graduate, and postdoctoral students.

6

7. Stanford should permanently extend the limit on development outside Academic Growth Boundary. This boundary is currently slated to expire during the proposed 2018 GUP.

7

8. Stanford should provide upstream floodwater retention as part of its removal of the Searsville Dam, which is a reasonably foreseeable development by Stanford University during the life of the proposed 2018 GUP.

8

9. The County should require that Stanford provide land and funding to build a new elementary school on the west side of campus to accommodate the students from the additional housing to be built. Although this requirement might not fit within the range to CEQA analysis and mitigations, it is certainly within the scope of a requirement for a General Use Permit, which is the form of a development agreement that can include considerations beyond CEQA.

9

10. Stanford housing rented to Stanford affiliates may have a property tax exemption. Stanford should agree not to seek property tax exemptions for any housing built for the 2018 GUP. Property tax exemptions for property that houses students enrolled in PAUSD means that no additional funds are received by PAUSD for these students because PAUSD is a “revenue limit” district that does not get most of its funding from the state based on attendance figures. So the costs of the enrollment would be borne by the taxpayers of Palo Alto and Los Altos Hills if not

10

Comment Letter I-Keller

- borne by Stanford University. Although this requirement might not fit within the range to CEQA analysis and mitigations, it is certainly within the scope of a requirement for a General Use Permit, which is the form of a development agreement that can include considerations beyond CEQA. ↑
10
cont.
11. As part of the 2000 GUP, Stanford was told to do a study to set a limit on the maximum sustainable build out. Stanford failed to do that in 2009. Stanford should be required to perform that study and have it accepted by the County Board of Supervisors prior to the 2018 GUP being granted. |
11
12. Stanford should be required to adopt a policy policy of carbon neutrality for all new construction. Although this requirement might not fit within the range to CEQA analysis and mitigations, it is certainly within the scope of a requirement for a General Use Permit, which is the form of a development agreement that can include considerations beyond CEQA. |
12
13. Stanford should increase infrastructure for electric vehicle charging commensurate with the growth of plug-in vehicle sales. See <https://www.autoblog.com/2017/05/05/california-zero-emissions-cars-goal/> and <http://drivingzev.com/zev-state/california> |
13

5.2.3.83 Responses to Comments from Arthur Keller

- I-Keller-1 The tax issues raised in the comment are socioeconomic issues not within the scope of environmental review under CEQA. See Master Response 1: Non-CEQA Comments. The TDM program has sufficient funding irrespective of changes to tax law, as Stanford funds these programs directly and is not dependent on funding from local, regional, state, or federal sources.
- I-Keller-2 Please see Response to Comment I-Holzemer-6 above regarding double counting. Stanford provides free transit and TDM opportunities beyond the campus cordon, which reduces trips to and from destinations in the nearby communities. Santa Clara County recognizes this and credits Stanford for off-campus trip reduction that results from programs that Stanford provides or funds within defined geographic boundaries. This is defined by the area that would be impacted by traffic if Stanford did not achieve the no net new commute trips standard. These are not trips that cross into campus and would not be double counting of trips.
- Community Plan Policy SCP-C 8 specifies that the County will recognize participation by Stanford in off-campus trip reduction efforts and credit reduced trips toward Stanford's attainment of the no net new commute trips standard. Under the current County-approved methodologies, the forms of trip reductions outside the cordon which are counted include²⁹:
- 1) Marguerite riders outside the cordon
 - 2) Hospital employees in the Commute Club
 - 3) Hospital employees on the Stanford-subsidized East Bay bus service.
- I-Keller-3 There is no evidence that the travel routes selected with the assistance of trip-routing applications such as Waze would be any different from travel routes used by selected by drivers without the assistance of trip-routing applications. The Draft EIR uses the TIRE methodology because most of the neighborhoods that would experience increases in traffic are located in the City of Palo Alto, and this is the methodology that Palo Alto uses. The TIRE methodology was independently reviewed for application on the proposed Project and is recognized to be an appropriate methodology supported by substantial evidence.
- Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for additional detail on the methodology and impact evaluation for neighborhood streets.

²⁹ The accounting of all trip credits is provided in the annual Traffic Monitoring Reports at: <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Archive.aspx>.

- I-Keller-4 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for information on how taxis and ride-hailing services were considered in the deduction for cut-through trips.
- I-Keller-5 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.
- Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.
- The Draft EIR explains on page 5.15-155 that the Governor's Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.
- I-Keller-6 On June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.
- I-Keller-7 Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Keller-8 Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.
- I-Keller-9 Please see Master Response 12: Public Schools, Topic 2: Additional School Site.
- I-Keller-10 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.
- I-Keller-11 Please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study.

- I-Keller-12 This comment requests that the County adopted a policy of carbon neutrality for all new construction. This is a policy matter for the County Board of Supervisors to consider. Section 5.7 of the Draft EIR analyzes the Project’s GHG emissions consistent with CEQA requirements. Please also see Response to Comment O-MS-4.
- I-Keller-13 The Draft EIR does not identify a significant impact on the environment that would be reduced by a requirement that Stanford provide electric vehicle charging stations. Electric vehicle charging is required by County Ordinance (A5.106.5.3 Electric Vehicle Charging), which states that at least five percent of the parking spaces of nonresidential structures should be capable of supporting future electric vehicle supply equipment. Stanford has nearly 80 electric charging stations as of Fall 2018.³⁰

³⁰ <https://transportation.stanford.edu/electric-vehicle-location-and-fees-table>.

Comment Letter I-Kenyon

From: [Carol Kenyon](#)
To: [Rader, David](#)
Subject: Fwd: Stanford Build Out
Date: Thursday, January 25, 2018 2:55:55 PM

>

> Mr. Radar

>

> Stanford University is asking to be allowed by SCC to become too huge with too much growth. ENOUGH!
ENOUGH! I appreciate the outstanding University Stanford is and has always been. My husband, who is a native Palo Alto, and I take advantage of the excellent educational opportunities Stanford has created for us. However, the growth of Stanford has become suffocating in the city and surrounding areas of Palo Alto. The gigantic Medical Center with all the multitude of related offices and clinics, the growth of student enrollment, faculty and student housing, staff and administration has made living, biking and walking in Palo Alto an unacceptable ordeal.

>

> Please vote to put restrictions on Stanford and demand they become responsible neighbors to the residents of Palo Alto and the County.

1

Carol Kenyon, 60 year resident of Palo Alto

5.2.3.84 Responses to Comments from Carol Kenyon

I-Kenyon-1 A general comment is made about the growth of Stanford.

Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

A general comment is also made regarding the Stanford University Medical Center (SUMC). The SUMC is not located within the general use permit boundary, or associated with either the 2000 General Use Permit or the 2018 General Use Permit. 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.

Comment Letter I-King

From: [Bonnie King](#)
To: [Rader, David](#)
Subject: Stanford 2018 General Use Permit
Date: Tuesday, January 30, 2018 9:04:49 AM

Dear Mr. Rader,

Please do not allow Stanford to continue to grow. Recent growth initiatives to expand the campus have already profoundly impacted the quality of life here in Palo Alto by:

1) Creating colossal traffic congestion. It is now extremely difficult to leave or enter Palo Alto, or go out for errands during most of the work day, save brief windows of time when the massive Stanford workforce is not arriving and leaving, clogging El Camino Real, Central Expressway, Oregon Expressway and Page Mill.

1

2) Turning our town into a permanent construction zone. I live in College Terrace, a neighborhood on the edge of the campus. Over the past 10 years, College Terrace has been surrounded by two massive housing construction projects that have crammed in huge numbers of new homes. The noise and traffic associated with the myriad construction projects makes leaving one's windows open at night impossible if one doesn't want to wake at 5:00 every morning, including Saturday to truck traffic and back up beepers. Although construction is a part of modern urban living, due to the magnitude and ongoing nature of Stanford's expansion projects, our neighborhoods are permanently dusty, noisy, unsightly construction zones.

2

3) Appropriating and repurposing our residential neighborhoods for faculty housing. Stanford is also buying up the homes in our neighborhood for their faculty. Instead of renting them out, or letting faculty buy them, they are tearing them down and building large two story homes, which they will retain permanent ownership of. Over the past 6 months, I have received two notices that homes within 150 ft of my house will be torn down, meaning that I will be in the middle of two Stanford construction projects for the next year. But, the larger issue is that Stanford is executing a corporate takeover of our neighborhood. Every time a house comes on the market, Stanford, with its deep pockets, outbids all other buyers. My Palo Alto neighborhood is now a permanent construction zone, and will eventually be entirely owned by Stanford.

3

There is nothing noble about what Stanford is doing. The University has become a corporate monster set on a mindless course of endless growth and expansion to fuel campus empires. Please say no to further expansion.

4

Sincerely,

Bonnie King

5.2.3.85 Responses to Comments from Bonnie King

- I-King-1 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.
- I-King-2 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please see Draft EIR Section 5.12 Air Quality, Section 5.11 Noise and Vibration, and Section 5.15 Transportation and Traffic which address all construction noise and traffic impacts associated of the proposed Project, and mitigation that reduces significant impacts to the extent feasible.
- I-King-3 The comment consists of personal opinions that do not address the address the adequacy of the Draft EIR. See Master Response 1: Non-CEQA Comments.
- I-King-4 The comment consists of personal opinions that do not address the address the adequacy of the Draft EIR. See Master Response 1: Non-CEQA Comments.

Comment Letter I-Komoroske

From: [Alex Komoroske](#)
To: [Rader, David](#)
Subject: Comments on Stanford GUP
Date: Thursday, November 16, 2017 2:28:57 PM

We have lived in Menlo Park for 50 years, including 10 years in east Menlo and 40 years at our present address on [REDACTED] near Sand Hill Road. During that time we have watched the traffic volumes grow as development on the Stanford campus has progressed. Access to the campus has become increasingly difficult as more projects are completed. The spillover into our street off SHR and Alpine Road has led to daily backups of traffic in front of our house in the morning rush as schoolchildren compete with the commute through-traffic to reach their destinations. The backup on SHR heading towards the campus is an extended parking lot from about 6-10am. And the story is similar in the opposite direction from 3-7pm. This is the principle reason our street takes on so much volume as drivers attempt to get around the SHR blockage. Oddly, it only worsened when SHR was widened and improved a few years ago to 2 lanes in both directions for most of its length from the shopping center to I-280. Bikers and pedestrians have also increased over this time frame but not nearly enough to offset the vehicle traffic. The Stanford and municipal bus systems run more frequently but don't seem to carry many riders so this hasn't been effective at stemming the increase in flows. Given the high paced Stanford crowd, it is no wonder they won't take the time to walk, bike or wait for a bus or train to get where they are going; the cars just keep coming. It is an illusion to expect otherwise.

1

When I look at what Stanford is planning over the next 17 years, it is clear that we will suffer even further from higher traffic flows. Our ability to access or cross the campus will go from bad to worse as will our access to 280 via either SHR or Alpine at peak times. We have gotten skilled at finding alternative bypass routes, but they are getting scarier. We have a good friend who lived here for years, then moved to Washington, DC. She visited recently after a 20 year hiatus and was appalled about what has happened on campus. The days when we could meander over to the campus for a concert, lecture or just a stroll are long gone. Parking is scarce and now requires payment everywhere on campus. It was once one of the most relaxed open areas around here but has succumbed to the Silicon Valley high growth madness that is diminishing the quality of life for its students, faculty, residents and staff as well as the close neighbors. I think a strategic shift in thinking is needed at the senior level in the Stanford leadership to bring some perspective on the damage you are doing. 17 years from now, we may all regret the impacts of this plan.

2

Alex and Judith Komoroske
[REDACTED]
Menlo Park, CA 94025

5.2.3.86 Responses to Comments from Alex Komorske

- I-Komorske-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments. Please also see 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 mitigation that reduces significant impacts to the extent feasible.
- I-Komorske-2 The comment primarily consists of personal opinions and effects on quality of life. These comments do not address the address the adequacy of the Draft EIR. See Master Response 1: Non-CEQA Comments.

Comment Letter I-Langbein

John Langbein
Redwood City, CA

February 1, 2018

Santa Clara County Planning

Stanford General Use Plan

Here are my comments to the DEIR for the 2018 Stanford GUP. My comments are related to the transportation element. I suspect that many of my comments are similar to other individuals and groups in the Stanford Area, with the exception of comments that pertain to bicycling. I am a resident of Redwood City, but I do most of my local travel by bicycle both for commuting and recreation. My typical daily bike ride encompasses Alpine Rd, Santa Cruz Ave, and the Alameda.

Overarching comments:

The main metric for traffic is the “no new net vehicle (ie, motor vehicle) trips” spanning one-hour interval in the morning and afternoon rush hour. Although this “metric” addresses the peak congestion, it ignores the reality that congestion is now an on-going problem that spans the 10 to 12 hours of the day. Although less than the peak, the congestion is on-going and, for anyone traveling or crossing a thoroughfare that connects to Stanford, it is significant problem. I see this while cycling between 9 and 10 AM each morning on Alpine between RT280 and Sandhill, and while crossing Sandhill into Menlo Park at Oak. I suggest that there needs to be two levels to assess the “no new net trips” metric, one that is tied to the peak rush hour periods and a second that integrates the traffic between the peak rush hour periods. Secondly, the “no new net trips” needs to be the standard for each 16 individual entrances to Stanford.

1

This comment probably not relevant to the DEIR for the Stanford GUP, but, none the less, this is an overarching problem when evaluating the impacts of future traffic associated with all of future, Stanford development and needs to be addressed with a more systematic approach than is currently done. Stanford operates several facilities nearby and adjacent to their academic core and many of these facilities are outside the jurisdiction of Santa Clara County. When facilities are expanded, Stanford asks for approval from the governing jurisdiction. Studies are made of potential traffic impacts due to both to the submitted project and anticipated growth throughout the potentially impacted area. These studies rely upon a full understanding of the physics of flow of traffic on a macro-scale, and importantly, incorporates various assumptions about roadway capacity (and resistance to flow), and the contributions to traffic from other future projects, that are either in the pipe-line or projected. Once a Stanford project is approved, there is no mechanism to continually measure the impacts of increased traffic and to compare those measurements with modeled projections. On the other hand, the GUP does provide a mechanism to measure the impact of development within Stanford's academic campus; but it is only one measure and left unchecked are the impacts from other Stanford projects that relied and were approved purely on modeling of traffic. This hodgepodge approach needs to be changed. Careful monitoring of traffic from all developments needs to be done, and should the traffic impact exceed established thresholds, then the causative developer(s) should be responsible for additional mitigations.

2

With Stanford's multiple facilities spread around the mid-peninsula, they now can spread their employees around; case in point is the new Redwood City “campus”. As noted above, these satellite facilities go through a permitting process that uses a one-time study to gauge future impacts on traffic

3

Comment Letter I-Langbein

and are not re-evaluated once the project has been constructed and occupied. Stanford clearly is using this “loophole” to move employees away from their core campus in order to meet the “no net new trip” metric.

↑ 3
cont.

Mitigation measures:

My feeling is that the GUP tends to underestimate the true costs of building public works projects that could help mitigate the potential increase of traffic. For instance, Stanford proposes contributing \$250K to add of bike lanes on Santa Cruz Ave in West Menlo Park. The 250K would only pay for the “paint”. To provide bike lanes on Santa Cruz Ave, a lane must be dropped (lane “diet”). Engineering studies will be needed to figure-out which lane needs to be dropped and to assess its impact. Depending upon the eventual configuration needed to accommodate bike lanes, I would envision that the traffic lanes would need to be shifted and accordingly, the overhanging traffic lights would also need to be shifted. In addition, the intersection of Santa Cruz and the Alameda is hazardous to all users as it is a site with a history of many crashes. The traffic study for a lane diet, the reconfiguration of the Alameda/Santa Cruz intersection, and the reconstruction of traffic signals should be added to the cost of constructing bike lanes and this will vastly exceed the \$250K contribution proposed by Stanford. Stanford should contribute much more to this project.

4

In addition, one of the key routes from Redwood City to Stanford uses San Mateo Avenue in Menlo Park due to the bridge crossing San Francisquito Creek. The major challenges to cyclists using the San Mateo Ave. corridor are the crossings of Santa Cruz and Valparaiso Avenues during the rush-hour periods; traffic along these two major streets consists of two continuous streams; the only way to cross is to wait for some one to stop and break the stream. If these choke points could be fixed, that would contribute significantly to both improved safety and convenience of Stanford bike commuters coming from Redwood City and Atherton. Working with the local jurisdictions (Menlo Park and Atherton), these could be fixed with Stanford being a logical source of funds since the most of the commuters have a Stanford destination.

5

The conditions of Alpine Rd needs to be addressed. Stanford bound traffic, both rush and non-rush periods, are probably a major component. As some one who cycles Alpine Road on a daily basis, I can see that there is some room for improvement. In particular, since the road is not straight, I see motor vehicles drifting into the bike lane. At some places, the bike lane is narrow and constrained by the topography. Spot widening of the roadway could better accommodate the bike lane, but would be very expensive. Again, Stanford has the resources to contribute to this effort.

Past discussions have also covered the possibility of Stanford constructing a multi-use trail that could start at the “Dish” parking on Alpine Rd, cross under RT280 using an existing tunnel and connect either with Arastradero Preserve or Arastradero Rd. This would be a nice community benefit.

6

Another problematic area on Alpine Rd is the informal parking lot for the Dish trail. Again, as some one who cycles by that “parking lot”, I’ve encountered too many motorists performing “weird” maneuvers when entering or leaving the parking lot. Motorists also will park on Alpine Rd partially blocking the bike lanes (in both directions). Although I have tried to get San Mateo County to post “no parking” signs, the County has indicated to me that they would like to get that request directly from Stanford. Consequently, I would like to see Stanford do two items; 1) request to the County to place “no parking” signs between RT 280 and Piers Lane on both sides of Alpine and 2) make improvements to the egress of the parking lot (or, simply closing the parking lot).

↓

Comment Letter I-Langbein

San Mateo County has studied possible changes to Alpine Rd with the goals of improving traffic flow, allowing better access to Stanford Weekend Acres, and improving accommodate of bikes. It is likely that the County will approach Stanford to help fund these projects. One costly item proposes to address both the traffic flow and access to Stanford Weekend Acres by modifying the RT 280 interchange. There are two concepts that the County has evaluated. One proposal consists of two, two-lane roundabouts, and the second proposal consists of traffic lights. BOTH ALTERNATIVES WOULD NEGATIVELY IMPACT SAFETY OF CYCLISTS. DON'T SUPPORT EITHER ALTERNATIVE. Although the current configuration using the stop sign could be improved, at least in terms of providing better safety to cyclists (there has been at least one cycling fatality in the last 10 years), the current configuration is much better than the two proposed alternatives.

6
cont.

Other mitigation items need to be included such as contribution to Caltrain grade separations, and reconfiguring the interchanges on both RT280 and RT101 that serve motorists going to Stanford facilities (including the academic campus, SLAC, and the hospitals).

The GUP implies that Stanford employees could use more of Caltrain in the future as it becomes electrified. Caltrain is already at capacity and realistically, to increase capacity, they'll need to run more trains; yet the existing at-grade crossings up and down the Peninsula can barely handle the existing train service. Stanford needs to contribute significant \$\$ to converting at-grade crossings to grade-separated crossing such that motor vehicles (and cyclists) need not stop for the trains.

7

There are six freeway interchanges that directly feed the Stanford facilities in N. Santa Clara County, Palo Alto, and Menlo Park (Page Mill, Alpine Rd, Sandhill, Willow, University, Embarcadero/Oregon). Willow Rd is currently being re-configured from a clover-leaf to a partial clover-leaf design which is advertised to provide better accommodation of all users (motorist, cyclist, etc). Stanford should be do their share to upgrade the remaining interchanges. As noted in the DEIR, at least from a cycling perspective, these interchanges are significant barriers to safe commuting by bike. By going to either a partial cover-leaf or a diamond interchange, the freeway on/off ramps are "squared-off" where they meet the cross road (eg. Willow); consequently, cyclists will not need to deal with high-speed merges. (In addition, more bike/ped bridges will be very popular with those potential bike-riders that are currently intimidated with the existing "facilities".)

8

Currently, Stanford pays no income tax and minimal property tax (only on leased property to campus residents and, I would assume Stanford Shopping center). Yet, its endowment is, as of 2016, >\$20B and is ranked #4 for all US universities. Property tax is waived for so-called non-profits that contribute to "public good". Yet, the concentration of wealth associated with Stanford suggests that they have the means to help with the "public good" of the community – they should be compensate the community for their significant, negative impact upon our quality of life.

9

Sincerely

John Langbein

5.2.3.87 Responses to Comments from John Langbein

- I-Langbein-1 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic, and the results of Stanford's monitoring of each of the 16 campus gateways. As discussed in the Master Response, there is no evidence in the cordon data that suggest that vehicle trips to and from Stanford have increased outside the peak hours. The cordon count data show that the average daily traffic accessing the campus is roughly the same at it was 15 years ago, and the hour-by-hour distribution of traffic across the same is roughly the same as it was 15 years ago.
- I-Langbein-2 Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis; 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. See also 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.
- I-Langbein-3 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 for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).
- I-Langbein-4 The comment incorrectly refers to the Stanford's proposed funding of bike lane improvements on the Santa Cruz Avenue/Alameda de las Pulgas corridor as mitigation. Rather, as discussed in the Draft EIR Chapter 3 Project Description and Chapter 8 Special Considerations, Stanford proposes to make monetary contributions to fund a number of off-site bicycle infrastructure improvements, including in unincorporated San Mateo County on the Santa Cruz Avenue/Alameda de las Pulgas corridor. These improvements are intended to reduce the potential for local vehicle congestion effects by encouraging use of alternative modes of transportation, and thereby reducing Stanford commuter and other local vehicular trips that contribute to local congestion.

Comments questioning the sufficiency of the Stanford's proposed \$250,000 monetary contribution to fully fund the bicycle improvements on the Santa Cruz Avenue/Alameda de las Pulgas corridor are outside of the scope of this Draft EIR. However, the conceptual set of improvements that were used to develop costs were based on providing a reduced stress bicycle facility. The improvements that are being considered by the community address additional

circulation concerns, and San Mateo County will decide whether or how the improvements should be implemented.

I-Langbein-5 Please see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for a discussion of commenter-proposed bicycle infrastructure improvements.

I-Langbein-6 Please see Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation in the Draft EIR.

As illustrated in Figure 5.15-1 and presented in Table 5.15-1 of the Draft EIR, Alpine Road is analyzed, specifically the two interchanges at I-280 (#1 and #2) and the intersection of Alpine Road at Junipero Serra Boulevard/Santa Cruz (#25). The Project impacts at these intersections are presented in Impact discussions 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. The Draft EIR found a less-than-significant impact on Alpine Road at these intersections from the proposed Project. While not connected to the proposed Project, the San Mateo County Alpine Road Corridor Study analyzes the current conditions on Alpine Road and outlines a preferred set of improvements, including reconfiguration of parking at the Piers Lane Gate and treatment for the Alpine Road interchanges with I-280.³¹

I-Langbein-7 Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.

The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity. The Draft EIR explains on page 5.15-155 that the Governor's Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for a discussion of capacity assumptions provided by the Caltrain Joint Powers Board.

With regard to interchanges on both I-280 and U.S. 101, the Draft EIR evaluates the impacts of the proposed Project and identifies mitigation where warranted.

³¹ See <https://publicworks.smcgov.org/alpine-road-traffic-corridor-study>.

The Draft EIR found that the proposed Project would have a significant impact at intersection #13, I-280 Southbound Ramp/Page Mill Road (2018) and intersection #2, I-280 Northbound Ramp/Sand Hill Road (2018 and 2035). The Draft EIR identifies improvements at both locations: at intersection #13, fair-share funding toward installation of a traffic signal; and at intersection #2, fair-share funding toward the addition of a second northbound right-turn lane. The Draft EIR found that the proposed Project would not have a significant impact at the U.S. 101 interchanges. As described in Mitigation Measure 5.15-2, if Stanford does not achieve the no net new commute trips standard, Stanford would be required to pay a fair share contribution towards the intersection improvements needed to reduce the significant impacts of the project. The County would use the fair share contribution to fund improvements at these locations (or funding could be applied to trip reduction projects if use of the funds for intersection improvements is infeasible). 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.

- I-Langbein-8 The freeway interchanges and/or their approaches are analyzed in Impact 5.15-2 (Baseline plus Project) and Impact 5.15-9 (Cumulative plus Project) of the Draft EIR. 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. 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 Draft EIR found that the proposed Project would have a significant impact at intersection #13, I-280 Southbound Ramp/Page Mill Road (2018) and intersection #2, I-280 Northbound Ramp/Sand Hill Road (2018 and 2035). The Draft EIR found that the proposed Project would not have a significant impact at the U.S. Highway 101 interchanges. The Draft EIR identifies improvements at both locations: at intersection #13, fair-share funding toward installation of a traffic signal; and at intersection #2, fair-share funding toward the addition of a second northbound right-turn lane.

A project proponent is only required to pay its fair-share contribution toward intersection improvements (rather than fully fund or construct such improvements) as identified in the Draft EIR. Pursuant to CEQA Guidelines

section 15127.4 (4)(B), mitigation measures must be “roughly proportional” to the project’s impacts.

Finally, the City of East Palo Alto is constructing the Clarke-Newell Bridge that will provide access over U.S. Highway 101, in addition to the existing bicycle and pedestrian crossings of US Highway 101 at Van Buren Avenue, California Avenue and the Adobe Creek Crossing.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

- I-Langbein-9 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA.

Comment Letter I-Lawrence

From: [Henry E. Lawrence](#)

To: [Rader, David](#)

Cc: [REDACTED]

Subject: Stanford GUP

Date: Thursday, November 30, 2017 3:40:25 PM

Importance: High

Dear Mr. Rader,

My wife Robin and I live on [REDACTED] with the back of my house on Sand Hill Road. From 1989 to 2003 there was a slow growth in the traffic but it was manageable. In 2003 the Stanford Management Company entered into a contract with the city of Menlo Park to widen the San Fransiquito Creek bridge on Sand Hill Road and upgrade the intersection of Santa Cruz Avenue and Sand Hill Road to allow for additional traffic flow.

1

Since that time the traffic has doubled with a corresponding increase in the traffic noise. In 2003 I spoke before the Menlo Park City Council and said that if Stanford was considering rapid development then it should build its own road connecting the Campus to the Freeway and that this road should be placed between Alpine Road and Page Mill Road. This condition should be added to the 2018 Stanford GUP. The Stanford Management Company has unfairly burdened Menlo Park and this burden is extremely disproportional to the tax benefit Menlo Park receives since the it has engaged in clever schemes to avoid paying property taxes leaving Menlo Park residents to make up the shortfall.

2

My proposed road would be a 4 lane divided road connecting I 280 (between Alpine Road and Page Mill Road) with Governor's Avenue adjacent to the Elliott Program Center. The proposed Road would be built between the Stanford Golf Driving Range and Lake Lagunita. From I 280 the road would be placed south of the Reservoir and south of the Carnegie Foundation and the Center for Advanced Study in the Behavioral Sciences. It would then go either over or under Junipero Serra without connecting to it. The purpose of the road is not to offer short cuts to Menlo Park or Page Mill Road but to provide a dedicated road into the campus.

However, there are also some minor road disconnect issues that need addressing. Governor's Avenue currently has a disconnect between Santa Teresa Street and Santa Teresa Lane. This disconnect would be have to be eliminated to allow for continuous traffic flow. Governor's Avenue then dog ear's to the left into Searsville Road. Searsville Road also has a disconnect between Los Arboles Avenue and Campus Drive. This disconnect would be eliminated as well to allow traffic to proceed to Campus Drive. Once you arrive at Campus Drive you can make a right turn and then make a left turn on to Welsh Road and drive into the main Medical Complex.

3

For people wanting to go to the Stanford Shopping Center instead they can make a right turn on to Campus Drive and then make a left turn to Stock Farm Road and then make a right turn on Sand Hill Road.

Sincerely yours,

Comment Letter I-Lawrence

Henry E. Lawrence

Menlo Park, CA 94025



Virus-free. www.avast.com

5.2.3.88 Responses to Comments from Henry Lawrence

- I-Lawrence-1 The proposed 2018 General Use Permit does not propose offsite infrastructure changes. Therefore, it is beyond the scope of the EIR to determine whether or how City of Menlo Park roadways should be modified. Please also refer to Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives for the discussion of a new roadway connecting I-280 to Stanford.
- I-Lawrence-2 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA.
- I-Lawrence-3 See Response to Comment I-Lawrence-1, above.



Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.*

Name: Seth Leibson

Organization (if any): SEIU 2007

Address (optional): _____

City, State, Zip: San Jose, CA 95126

E-mail: ~~seth.leibson@seiu2007.org~~ [REDACTED]

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

I think it is important that Stanford
offer more affordable housing and transportation
to service workers who ~~are~~ make essential
contributions to the University and struggle
to survive in the Bay Area. I also believe
the University can do more to support the
county's efforts to expand affordable housing.

1

(More space on reverse side)

5.2.3.89 Responses to Comments from Seth Leibson

I-Leibson1-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-Leibson2

From: [Seth Leibson](#)
To: [Rader, David](#)
Subject: Stanford Environmental Impact Report
Date: Monday, January 29, 2018 3:20:52 PM

Dear David Rader, Mr.

As a resident of Santa Clara County who works at Stanford, I have serious concerns about Stanford Environmental Impact Report. Specifically, I do not think the University is sufficiently accounting for the impact of thousands of additional employees on affordable housing in the Bay Area. Please insist that Stanford assess these impacts more realistically, and guarantee housing for low-wage service workers who otherwise will face the greatest challenges, and longest commute in our overheated housing market, impacting all of us.

1

Sincerely,

Seth Leibson

San Jose, CA 95126

5.2.3.90 Responses to Comments from Seth Leibson

I-Leibson2-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-Leonard1

From: [Gwen Leonard](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Friday, February 2, 2018 12:03:24 PM

Deny the GUP in its entirety and require full EIRs for each specific project, so that a valid assessment can be made of overall impacts on the surrounding communities.

1

Dr. Gwen Leonard
Menlo Commons
[REDACTED]
Menlo Park CA 94025

5.2.3.91 Responses to Comments from Gwen Leonard

I-Leonard1-1 The comment includes an opinion about denying the Project; please see Master Response 1: Non-CEQA Comments.

Regarding the comment requesting requiring full EIRs for each specific project, please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

Please see also Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

Comment Letter I-Leonard2

2018 FEB -2 PM 3:33

COUNTY OF SANTA CLARA

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

Mr Rader:

This is to strongly lobby for Stanford University to include adequate funds in its GUP for traffic mitigation in the Alameda/Sand Hill/ Alpine area in Menlo Park/San Mateo County traffic area.

I am a resident of Menlo Commons, an adult community in the said area (address—[REDACTED] [REDACTED] [REDACTED] and have been living here for the last 4.5 years. In that period of time, the additional building of the University has contributed to an unbelievable increase in traffic and has pointed up a crying need for traffic mitigation, which, of course, costs money. Any future plans for development will increase the need.

Consequent issues of safety have necessitated a County Task Force of community residents to help identify and lobby for traffic modifications to alleviate current accident rates and egregious risk spots. Some of the solutions for these problems are major and need major funding going forward. It is only fair government to require the cause of the unsafe situations (the University's heavy traffic flow) to contribute to the solutions.

Thank you for your attention to this request.



Dr. Gwen Leonard
Menlo Commons
[REDACTED] [REDACTED]
Menlo Park CA 94025

5.2.3.92 Responses to Comments from Gwen Leonard

I-Leonard2-1 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

Comment Letter I-Levenberg

From: [Susan Levenberg](#)
To: [Girard, Kirk](#); [Rader, David](#); [Kumar, Kavitha](#); [Supervisor Simitian](#)
Subject: Stanford's proposed GUp
Date: Saturday, January 27, 2018 1:54:23 PM

My husband and I have been a residents of Palo Alto for over 40 years. Many years ago I was an Attorney with the County Counsel's Office and I worked on a Stanford Use Permit in the 1980s. The Stanford Campus has undergone significant growth since that time, and is now seeking an additional 3.5 million square feet of development.

Stanford's current proposal presents the perfect opportunity for the County to insure that the Foothills surrounding Stanford remain open space. Now is the time for Stanford to dedicate a permanent conservation easement over the Foothills District in order to mitigate the huge increase in density that has occurred over time and is currently being proposed within the Academic Growth Boundary.

Susan Levenberg

[REDACTED]

Palo Alto CA 94303

1

5.2.3.93 Responses to Comments from Susan Levenberg

I-Levenberg-1 No changes to the existing Academic Growth Boundary (AGB) location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.

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

Comment Letter I-Lewnes

From: [Ann Lewnes](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Tuesday, January 30, 2018 9:19:52 AM

Mr Rader:

I am a resident on a narrow street of the Crescent Park section of Palo Alto, a RESIDENTIAL neighborhood that experiences gridlock every morning and evening. It has become nearly impossible to get to and from my home. Allowing Stanford to further expand its facilities without restriction will make the situation impossible for us.

1

Specifically:

1. The expansion of Caltrain capacity expected with electrification has already been "consumed" by previous projects.
2. Stanford traffic trip "credits" should be limited (finite) in number so as not to create an open-ended system where the letter of the agreement could be met while skirting the spirit.
3. As the largest landowner, employer and developer in the region, Stanford must contribute both financial and intellectual resources to addressing the traffic challenges in the broader community in which it resides (e.g. grade separations for the Caltrain, state-of-the-art traffic mitigation throughout the area, not merely at the campus boundary).

2

3

4

We have galvanized our efforts to resist further development at Stanford and in our city and will not go quietly.

5

Ann Lewnes

5.2.3.94 Responses to Comments from Ann Lewnes

I-Lewnes-1 Please refer to 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 in the future, and Topic 8: Neighborhood Street Impacts for a discussion of how potential impacts to neighborhood streets, including those in Crescent Park, were addressed in the Draft EIR.

I-Lewnes-2 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.

Assumptions about future transit capacity were based on the best available information from Caltrain at the time of EIR preparation. The analysis relies on the 2014 Caltrain Capital Improvements Program (CIP), which states that Caltrain would expand its platforms to accommodate eight-car trains.

I-Lewnes-3 The current and proposed modifications to the approved trip credits are 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.” A cap on trip credits would be a disincentive for Stanford to remove trips from the road, and could reduce programs that Stanford offers to other community members, such as the free, publicly accessible, Marguerite shuttle.

I-Lewnes-4 The City of Palo Alto is studying multiple scenarios related to grade separation and is not expected to have a preferred scenario until early-2019, which would then trigger a need to commence environmental review in 2019. Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.

I-Lewnes-5 The comment includes an opinion about opposing the Project, please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Liebes

TO: David Rader
Dept. of Planning and Public Works
County Government Center
70 West Hedding St., San Jose, CA 95110

FR: Sidney Liebes
[REDACTED]
Atherton, CA 94027
[REDACTED]

CC: Joe Simitian
Santa Clara County Board of Supervisors

DATE: Jan. 22, 2018

RE: 2018 Stanford University General Use Permit Draft EIR

As a 1957 Stanford Physics Ph. D., with deep appreciation for Stanford's intellectual contribution to the world, I have been increasingly saddened, over the decades, that the Stanford Board of Trustees and University management have demonstrated such limited sensitivity to the distinction between optimal and maximal physical size. The stature of the University would enable it to set a conspicuous example to its community, the nation and the rest of our bursting world that humanity has far surpassed optimal physical size, in multiple dimensions. It is far past time for us all to shift resources from multi-dimensional physical growth to multi-dimensional quality growth.

1

I limit myself to two comments on the massive 5,413-page, almost exclusively boilerplate, 2018 Stanford University General Use Permit Draft EIR:

1) Among the innumerable illustrations in the entire document, I was not able to find a single one depicting the boundary of the Project location on Stanford lands. The only reference I was able to identify regarding this centrally significant aspect of the Project was the following vague single sentence, on page 1-2:

2

"The project site is generally located southeast of Sand Hill Road, southwest of El Camino Real, northwest of Stanford Avenue and Page Mill Road, north of Arastradero Road, and east of Alpine Road."

2) Whereas, the Project would substantively contribute to our increasingly congested local and regional traffic problems, Impact 5.15-2 (page 1-34) states:

"Implementation of the proposed Project could [sic] increase traffic volumes at area intersections, creating adverse impacts ..." Yet the EIR acknowledges the impact to be "Significant and Unavoidable."

3

and Impact 5.15.10 (page 1-39) states:

"Implementation of the proposed Project, in combination with past, present, and foreseeable future projects, could [sic] increase traffic volumes on area freeways, contributing considerably to significant adverse impacts ..." Yet the EIR acknowledges the impact to be "Significant and Unavoidable."

I am chagrined by Stanford.

5.2.3.95 Responses to Comments from Sidney Liebes

I-Liebes-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Liebes-2 Regarding the boundary of the proposed Project, it is illustrated on the majority of figures in the Draft EIR, including Figures 3-3 through 3-12 in the Draft EIR Project Description (identified as “Stanford 2018 General Use Permit Boundary” in the figure legends).

I-Liebes-3 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please refer to Section 5.15 Transportation and Traffic for a fully explanation and context as to why these impacts would remain significant following mitigation.

Comment Letter I-Lipshutz

From: [Robert Lipshutz](#)
To: [Rader, David](#)
Subject: Comments on the Stanford GUP EIR
Date: Wednesday, January 31, 2018 6:25:35 PM

Dear Mr. Rader,

I am a resident of Palo Alto and am quite concerned about the scope of Stanford's planned growth and its potential impact. Specific comments regarding the EIR. Among other items

1

1. The expansion of Caltrain capacity expected with electrification has already been "consumed" by previous projects.

2

2. Stanford traffic trip "credits" should be limited (finite) in number so as not to create an open-ended system where the letter of the agreement could be met while skirting the spirit.

3

3. As the largest landowner, employer and developer in the region, Stanford must contribute both financial and intellectual resources to addressing the traffic challenges in the broader community in which it resides (e.g. grade separations for the Caltrain, state-of-the-art traffic mitigation throughout the area, not merely at the campus boundary).

4

4. Stanford should, as part of its plan be required to coordinate with local communities on San Francisco Creek flood mitigation.

5

Thank you
Robert Lipshutz
Palo Alto

5.2.3.96 Responses to Comments from Robert Lipshutz

- I-Lipshutz-1 Please see responses to individual comments, below.
- I-Lipshutz-2 Please see Response to Comment I-Lewnes-2.
- I-Lipshutz-3 Please see Response to Comment I-Lewnes-3.
- I-Lipshutz-4 Please see Response to Comment I-Lewnes-4.
- I-Lipshutz-5 Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

Comment Letter I-Liu

From: [sophia liu](#)
To: [Rader, David](#)
Subject: 2018 GUP Stanford Expansion Plan
Date: Monday, October 23, 2017 12:00:21 PM

I am a resident of Palo Alto. I attended a big portion of the public hearing on Oct 19th at the council chamber of Palo Alto.

From Page 507 and 508 of DEIR, I do not see the potential detailed impact from the project to PAUSD in terms of enrollment figure, money for hiring extra teachers and where to find the teacher when the district is already talking about how hard to retain teachers. For example, "420 children" would would not change as stated in the report, which I find it is hard to comprehend. Also if the near or long term enrollment projection from the district and used by the DEIR report is underestimated, how Stanford is going to help provide funding to build new schools.

1

For everyone to understand the situation clearly, please include the current situation:

2

1) How many PAUSD students are current from Stanford campus? And will be if 2018 GUP is approved?

2) How much PAUSD budget is being supported by Stanford directly or indirectly currently? What is the number if 2018 GUP is approved?

3

Secondly, for traffic during dropoff or pickup time at Paly, how to ensure a workable effective execution plan if any emergency situation occurs. this morning, the traffic was a big chaos between 7am to 9am due to a car crash near Oregon Expressway and Alma.

4

Sincerely,

Sophia Liu



5.2.3.97 Responses to Comments from Sophia Liu

- I-Liu-1 With respect to Project enrollment under the 2018 General Use Permit, please refer to Draft EIR Impact 5.13-4, and specifically Table 5.13-3 on page 5.13-17. This impact finds that while the proposed Project would increase enrollment in local public schools, it would not result in adverse physical impacts from the construction of additional school facilities in order to maintain acceptable enrollment standards. Consequently, the impact is deemed to be less than significant. Similarly, the Project contribution to cumulative impacts was also found to be less than significant. Accordingly, no mitigation was required for these impacts.
- Please also refer to Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts as it relates to the adequacy of student enrollments and forecasts used in this EIR.
- The comment makes a reference to “420 children;” however, there is no reference to 420 children in the Draft EIR.
- I-Liu-2 The number of existing students from the Stanford campus enrolled at PAUSD schools is not known, however, they are not associated with an increase in PAUSD enrollment under the proposed 2018 General Use Permit, and are accounted for in the 2018 baseline enrollment at PAUSD. As discussed in Response to Comment I-Liu-1, above, Project enrollment under the 2018 General Use Permit is estimated in Draft EIR Impact 5.13-4. As discussed above, the Project, either by itself or in combination with other cumulative projects, would not result in adverse physical impacts from the construction of additional school facilities in order to maintain acceptable enrollment standards.
- I-Liu-3 Comments requesting to know how much PAUSD budget is currently being supported directly or indirectly by Stanford, or would be under the proposed 2018 General Use Permit, raise socioeconomic issues outside the scope of this EIR.
- I-Liu-4 Please refer to Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.



Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.*

Name:

Kevin J. Lortie

Organization (if any):

Stanford Union member

Address (optional):

City, State, Zip:

Palo Alto, CA 94301

E-mail:

[REDACTED]

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

Please provide sub-market housing
~~for~~ to be made available to some
of the union staff members as a
portion of this construction project.

1

(More space on reverse side)

5.2.3.98 Responses to Comments from Kevin Lortie

I-Lortie-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, 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 10: Affordable Housing.

Comment Letter I-Lu

From: [Hannah Lu](#)
To: [Rader, David](#)
Subject: Concerns about Stanford GUP
Date: Friday, November 10, 2017 4:35:51 PM

Hi Mr. Rader,

I am a long time Palo Alto resident, and I am deeply concerned by the significant and negative environmental and community impact that will be caused by Stanford’s General Use Permit (GUP). 1

Due to the rapid growth of high tech companies and the ensuing flood of new hires into the bay area, Palo Alto is already suffering unprecedented traffic congestions on all major roads and severe parking shortages. Stanford projects to grow by >9000 individuals, which is a 13.4% growth in population. How does the existing infrastructure support such a growth? Many of the most congested intersections simply have no feasible mitigation plans. 2

Stanford’s new house are not close to schools, requiring parents to drive students during the peak hours on the already grid-locked streets. The projected total no. of kids is >400, living relatively close to each other. We urge Stanford to consider support (land and funding) a new school to reduce the no of trips parents take during the peak hours. 3

The School Generation Rate Stanford used to calculate enrollment impact on schools is questionable. We suggest it should be higher than the number Stanford estimates (275 students). PAUSD should expect surges to enrollment, and not gradual growth, over years and across grades. 4

Stanford’s rental properties are tax exempt which means there’ll be no property tax from new rental properties, even though there’ll be many more kids from the expansion effort attending PAUSD. Given that PAUSD is a basic aid district funded in large part by property taxes, whether Stanford chooses to lease or rent these new 550 units has long term financial impacts on the PAUSD budget. 5

These concerns are serious and have long term implications on Palo Alto. Stanford needs to address each of these with satisfactory and feasible mitigation plans, as well as provide sufficient funding. Their financial contribution must NOT be capped to work in their favor. 6

Sincerely,

Hannah Lu

Palo Alto Resident

5.2.3.99 Responses to Comments from Hannah Lu

- I-Lu-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- I-Lu-2 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.
- I-Lu-3 Please see Master Response 12: Public Schools, Topic 2: Additional School Site.
- I-Lu-4 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- I-Lu-5 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.
- I-Lu-6 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Request for Comments: Stanford 2018 GUP DEIR

Overview

Background

The Stanford 2018 General Use Permit (GUP) *DRAFT* Environmental Impact Report (DEIR) is available for review. Stanford is under the jurisdiction of Santa Clara County and submits a plan for growth and a request for a new GUP each 17 years or so. The GUP will become a guiding policy document for Stanford's planned growth. The EIR studies impacts on the community generally in areas of transportation, land use, utilities, noise etc. In areas where significant impacts are expected, the DEIR offers suggestions for mitigation efforts. Ultimately, if the GUP Final EIR is approved, these mitigations may be required. Right now is our opportunity to comment on the plan and related proposed mitigations. If we fail to comment now, future recourse for impacts of development may be forfeit.

Report reference

A simple DEIR summary is [here](#). A pdf version of the full DEIR can be found [here](#). References in the following text correspond to Volumes 1 & 2 of the full DEIR.

Note. There are 3 volumes in the DEIR which include a lot of data tables and appendices, but if you follow the table of contents to specific topics, the text is easy to read.

SRTS potential impact

Stanford's growth and constructions projects will directly and indirectly affect all Palo Alto streets, school enrollment, and the ability for kids to bike and walk safely to school.

Submitting Comments

Action

Stanford is required to respond to written comments submitted by **December 4th, 2017**. Sometimes the project or mitigations are changed in response to these comments. Making good, strategic comments can lead to improved outcomes. Review the attached talking points and suggested questions/comments to develop your own submission.

Tips for Effective Comments

To develop good, strategic comments:

Do	Don't
• Ask Questions! Be objective. Be specific. When possible, present facts or expert opinions. • Make suggestions for ways to avoid impacts or enforceable (measurable) ways to reduce severity of impacts. • Separate your concerns into clearly identifiable chunks-- don't mix topics. • Make specific suggestions (i.e. fund additional crossing guards, pay for bussing kids from new Stanford affiliated families to overflow schools, add additional bicycle infrastructure, or off-site park-and-ride locations etc.)	• Simply complain, such as, "I don't agree with your projection" or "I don't think these changes are good for the community". Instead, include suggestions for making it better. • Assume the Authority knows everything about your neighborhood! Each person knows details about a specific location, that when added to the public comments, can actually change an EIR.

Comment Letter I-Lungren

Template

Choose issues that are important/relevant to you and pull some ideas from the sample letter below to create your own letter.

Dear Mr. Rader,

Here are my comments on the 2018 Stanford GUP Application. Kindly confirm receipt by deadline.

Issue #1: _____

The Stanford DEIR states that _____. I feel that the mitigation efforts are not sufficient because _____. Please consider some of the following suggestions:

- A
- B
- C

Issue #2: _____

The Stanford DEIR describes _____. What about _____? Could Stanford monitor _____ and include results in the annual report?

Issue #3: _____

The Stanford DEIR describes _____ mitigation efforts at intersection #XX. and suggests that there are no feasible mitigation efforts. Could Stanford do X, Y, and/or Z instead?

Thank you for considering my comments.

Name

Address

Submissions

PTA members or community residents may submit comments as individuals on issues they feel are important.

Address written comments on the Draft EIR by **December 4th** to:

County of Santa Clara

Department of Planning and Development

Attention: David Rader

County Government Center

70 West Hedding Street, San Jose, CA 95110

Phone: (408) 299-5779

Email: david.rader@pln.sccgov.org

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?
- Could Stanford find ways to encourage commuting parents to bike/walk to Stanford after biking/walking their kids to school?
- How will Stanford expand the TDM program to achieve this 7% increase ridership on Caltrain?
- 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?
- 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?

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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 6
- 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). 7
- Does the proposal for locating affordable housing within one-half mile of major transit specify efficient transit routes directly to Stanford? 8
- 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. 9

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).

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:

- The added housing numbers used in the school-aged children generation calculation was 550, referring to the number of Staff/Faculty dwellings proposed for the project. Why weren't the graduate housing beds used? Stanford's current data (2018) suggests graduate students have 420 children living within the project boundaries which equates to a rate of 0.8 children per grad student. If Stanford adds 900 additional grad beds, that could mean additional children not included in the projected impact. 10
- 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? 11

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:

- I think that 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. 14
- Could Stanford consider an offsite park and ride location near the 101 to prevent some of the auto trips on Embarcadero? 15
- 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? 16
- 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? 17

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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19

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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5.2.3.100 Responses to Comments from Libby Lungren

- I-Lungren-1 Please see Response to Comment A-PAUSD1-10.
- I-Lungren-2 Please see Response to Comment A-PAUSD1-11.
- I-Lungren-3 Please see Response to Comment A-PAUSD1-12.
- I-Lungren-4 Please see Response to Comment A-PAUSD1-13.
- I-Lungren-5 Please see Response to Comment A-PAUSD1-14.
- I-Lungren-6 Please see Response to Comment A-PAUSD1-15.
- I-Lungren-7 Please see Response to Comment A-PAUSD1-16.
- I-Lungren-8 Please see Response to Comment A-PAUSD1-17.
- I-Lungren-9 Please see Response to Comment A-PAUSD1-18.
- I-Lungren-10 Please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.
- I-Lungren-11 Please see Response to Comment A-PAUSD1-19.
- I-Lungren-12 Please see Response to Comment A-PAUSD1-20.
- I-Lungren-13 Please see Response to Comment A-PAUSD1-21.
- I-Lungren-14 Please see Response to Comment A-PAUSD1-22.
- I-Lungren-15 Please see Response to Comment A-PAUSD1-23.
- I-Lungren-16 Please see Response to Comment A-PAUSD1-24.
- I-Lungren-17 Please see Response to Comment A-PAUSD1-25.
- I-Lungren-18 Please see Response to Comment A-PAUSD1-26.
- I-Lungren-19 Please see Response to Comment A-PAUSD1-27.
- I-Lungren-20 Please see Response to Comment A-PAUSD1-28.
- I-Lungren-21 Please see Response to Comment A-PAUSD1-29.

Comment Letter I-Mandinach

From: [Jo Ann Mandinach](#)
To: [Girard, Kirk](#); [Rader, David](#); [BoardOperations](#); [Cortese, Dave](#); [supervisor.chavez@bos.sccgov.org](#); [Supervisor Simitian](#); [supervisor.wasserman@bos.sccgov.org](#); [Supervisor Yeager](#); [City.council@cityofpaloalto.org](#); [liz.kniss@cityofpaloalto.org](#); [Karen.holman@cityofpaloalto.org](#); [lydiakou@cityofpaloalto.org](#); [tom.dubois@cityofpaloalto.org](#); [eric.filseth@cityofpaloalto.org](#); [greg.tanaka@cityofpaloalto.org](#); [cory.wolbach@cityofpaloalto.org](#); [Adrian.fine@cityofpaloalto.org](#); [greg.scharff@cityofpaloalto.org](#); [city.manager@cityofpaloalto.org](#)
Subject: Stanford Expansion Needs More Study or Better Yet a Total Rejection
Date: Wednesday, November 29, 2017 6:49:10 PM

Hello.

My partner, sister and many friends are Stanford grads but we are adamantly opposed to this huge expansion. I've lived in Palo Alto for 32 years and like many others am thoroughly disgusted with the aggressive growth here and how it has severely reduced our quality of life.

1

At the very least, a project of this magnitude requires much more study to assess its effect on traffic, congestion, natural resources, housing affordability, school enrollment, the ability of emergency services to get through the gridlock in a timely fashion, etc etc,

2

Palo Alto is already way too over-developed to sustain the expansion that Stanford proposes at a time when we're already gridlocked and still spending a ridiculous amount of money to narrow roads, put barriers and "road furniture" and other obstacles into the road to and restrict traffic.

3

Traffic is already backing up **into** major arteries like Embarcadero and Oregon Expressway due to these attempts to limit car traffic yet we're already seeing Palo Alto's population triple due to commuters. This is so costly and so illogical -- and we certainly don't need to make it so much worse!

4

Extend the study for 60 days or better yet 60 years. In other words, just say NO to more development that severely reduces our quality of life,

5

Most sincerely,
Jo Ann Mandinach
[REDACTED]
Palo Alto, CA 94301

Jo Ann Mandinach
Need To Know Info Solutions
<http://www.needtoknow.com>
[REDACTED]
Palo Alto, CA 94301

5.2.3.101 Responses to Comments from Jo Ann Mandinach

I-Mandinach-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Mandinach-2 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Please see Draft EIR Section 5.3 Biological Resources, Section 5.12 Population and Housing, Section 5.13 Public Services and Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative effects on biological resources, population and housing, public schools, and traffic impacts (including traffic congestion and emergency access) associated with the construction and operation of the proposed Project, and mitigation that reduces significant impacts to the extent feasible.

Please also note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

I-Mandinach-3 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Mandinach-4 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.

I-Mandinach-5 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Maples

From: [JIM MAPLES](#)
To: [Rader, David](#); [Supervisor Simitian](#)
Cc: [REDACTED]
Subject: S.U. GUP: If Stanford expands, then it should help with downtown Palo Alto parking
Date: Thursday, February 1, 2018 12:26:18 PM

I am strongly opposed to Stanford adding any more people to the local area. There are already too many people and too much crowding. However, it appears that some expansion will likely occur, and so we are reduced to finding ways to mitigate the effects of that expansion.

1

One thought that occurs to me is that Stanford can help Palo Alto with parking -- in particular with parking in the University Avenue downtown area. We all know what a nightmare that's become, and it will only get worse with Stanford's increased population. My proposal is that we ask Stanford to open up their parking lots -- in particular the athletic/stadium parking lots in the arboretum -- for use by workers in the downtown area. Some of these lots are already open to the public, but at a high fee -- \$16/day. At the present time, these lots are almost completely empty during typical workdays. I believe that Stanford should provide low-cost monthly or annual permits for these lots to anyone who can prove that they work in the downtown area. The university could then easily add a shuttle stop to the existing Marguerite bus lines so that workers could park there in the morning and take the shuttle to work downtown. This would cost Stanford almost nothing, would be a boon for low wage workers in the downtown area, and could greatly help the parking situation.

2

Sincerely,

Jim Maples

[REDACTED]

Palo Alto, CA

5.2.3.102 Responses to Comments from Jim Maples

- I-Maples-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- I-Maples-2 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Marriott

From: [Pat Marriott](#)
To: [Rader, David](#)
Subject: Stanford GUP
Date: Thursday, February 1, 2018 9:22:10 AM

Dear Mr. Rader,

I am concerned about the unending growth at Stanford. This area is already beyond the tipping point in terms of traffic and congestion.

The planned non-housing space Stanford wants adds up to 5.7 million square feet. How many more car trips will that add to 101, 280, Foothill Expressway, El Camino – not to mention all the traffic cutting through our neighborhoods?

We already have one of the highest jobs/housing ratios in the country. Stanford's projected growth will increase jobs 3X faster than homes over the next 20 years. Our roads and trains are already maxed out way beyond capacity.

Stanford should be paying more to help with our infrastructure, e.g., separating train tracks from our roads to provide more safety and better traffic flow.

Detailed trip credit information and its impacts on surrounding corridors should be readily available for all of us to see.

I'm concerned that the GUP allows Stanford to offset net new trips to campus by earning credits through reducing the number of trips in the areas surrounding the campus. If the reductions don't lower net new trips to zero, Stanford would then have to pay a fee.

Where are the details on the cost and effectiveness of specific credits?

Example: one source of credits is the Stanford Commute Club (GUP Trip Credits: Guideline 3 Commute Club Members). This club pays employees of Stanford Hospital and Clinics and Welch Road buildings for utilizing non SOV modes so Stanford can earn offset credits.

But these employees are already earning credits for non-SOV travel through the SUMC mitigation with the City of Palo Alto. It seems like these credits are being double counted!

Another source of credits is to park cars on Stanford land outside the campus and bus the drivers to campus. This does nothing to mitigate traffic on surrounding roads and highways!

Stanford says its goal is to keep all campus commute trips at the 2001 level, but with the proposed GUP I don't see how this can be possible. While the County is responsible for measuring annual activity, what good will it be to see the numbers when they go beyond that

Comment Letter I-Marriott

level?

⬆ 6 cont.

While it's nice to have the prestige of Stanford in our community, it has become the 800-pound gorilla that throws its weight around at the expense of ordinary residents. With all the growth from the big tech companies (even bigger gorillas) building multi-million square feet of offices in our neighborhoods, we have run out of housing, our roads are impossibly congested, and our quality of life has suffered greatly.

7

Please do not let Stanford make the situation even worse.

Thank you,

Patricia Marriott, Los Altos

5.2.3.103 Responses to Comments from Pat Marriott

- I-Marriott-1 Please refer to Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution for a discussion of project trip generation and how those trips were distributed to the local and regional transportation network, and Topic 8: Neighborhood Street Impacts for a discussion of how neighborhood streets were assessed for potential impacts due to cut-through traffic associated with the proposed Project.
- I-Marriott-2 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 on study area roadways. Please also see Master Response 13: Transportation and Traffic.
- I-Marriott-3 The comment does not identify impacts of the proposed project that would require financial contributions from Stanford toward infrastructure improvements, such as grade separations at train tracks. The traffic-related project impacts are presented in Impact discussions 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. Where significant impacts are anticipated to occur absent satisfaction of the no net new commute trips standard, physical intersection improvements are identified if improvements are feasible. Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the County would collect a fair share contribution towards the intersection improvements needed to reduce the significant impacts of the project from Stanford, and the Santa Clara County Planning Office would use the fair share contribution to fund one or more of the intersection improvements identified in the Draft EIR, including infrastructure improvements that would reduce a significant effect of the proposed Project. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.
- I-Marriott-4 The annual monitoring reports, which include detailed information about trip credits, are presented to the Community Resource Group and Planning Commission every year as part of the General Use Permit Annual Reports.³²

³² Located at <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Archive.aspx>.

I-Marriott-5 The methods for measuring the effectiveness of Stanford's off-campus trip reduction programs is described in the trip credit guidelines approved by the County Planning Office in consultation with the Community Resource Group.³³

Trip reduction credits for participation in the Commute Club by Hospital employees do not overlap with mitigation for the SUMC 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.

The comment states that another source of credits is to park automobiles on Stanford land outside the campus cordon and bus people to campus. The only off-site parking that Stanford uses for bus commuters is in the East Bay. Buses from the East Bay are removing regional trips from the road. Stanford receives trip reduction credits for non-Stanford University campus affiliates who use the East Bay bus service operated by Stanford. For example, in 2016, Stanford submitted a request for 42 credits for the U-line in the PM peak hour. Use of express buses from the East Bay removes cars from the San Mateo Bridge, Dumbarton Bridge, and freeways and highways traveling around the Bay from the south, depending on where the East Bay rider otherwise would have driven a car to access the Peninsula. These cars also are removed from local roads between the freeways and highways and the Stanford campus.

I-Marriott-6 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion regarding Stanford's payment of fair-share impact fees if the no net new commuter trips standard is not met, and Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

I-Marriott-7 General comments are made regarding effects on quality of life, a shortage of housing and congested roads. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

³³ Stanford Traffic Cordon Count Credit Guidelines, October 2015

Comment Letter I-Matlof1

From: [Jason Matlof](#)
To: [Supervisor Simitian](#); supervisor.wasserman@bos.sccgov.org; supervisor.chavez@bos.sccgov.org; [Cortese, Dave](#); [Supervisor Yeager](#); Rader, David; city.council@cityofpaloalto.org; planning.commission@cityofpaloalto.org
Cc: [Jason's Gmail](#)
Subject: Opposition to the Stanford 2018 GUP from Palo Alto Resident
Date: Monday, January 22, 2018 1:14:15 PM

Dear County Supervisors and Staff,

As a 22-year tax-paying Santa Clara County and City of Palo Alto resident (as well as lifelong Northern Californian), I'm deeply disturbed by the implications of the Stanford 2018 GUP proposal.

While the community recognizes the University's great intellectual and cultural contribution to the *broader S.F. Bay Area community*, our small city (Palo Alto) can not be expected to endure the impact and costs of the dramatic infrastructure requirements that would be required to sustain the proposed growth at acceptable traffic, environment and safety levels. Stanford must pay for the requisite infrastructure improvements prior to the approval of the 2018 GUP. The institution is growing well beyond our means. I urge you to stop all further development by Stanford until infrastructure and impact analysis is completed and requirements are placed upon Stanford to fund the necessary infrastructure improvements that would make their GUP proposals truly "**no net impact**" to our community.

Specifically, I find the following concerns with the 2018 GUP:

- Stanford's proposal should not be considered in isolation of the **significant existing transportation and traffic congestion problems** that the City of Palo Alto is already experiencing given the large imbalance between local jobs vs. locally employed residents. This ratio is one of the highest in the country, and contributes to an already existing traffic dilemma in our small residential community. 1
- University growth should not be considered in isolation given that it is tied to the Stanford University Medical Center (SUMC), the Stanford Research Park (SRP), Stanford Shopping Mall, SLAC, including the development proposed for 500 El Camino Real in Menlo Park (429,000 SF of office, retail and housing). Looking at each site in isolation does not provide a full picture of the cumulative impacts to Palo Alto. 2
- The GUP claim of "No Net New Commuter Trips" is naive given the millions of square feet of development proposed. [Many reports detail the naive and poorly formed aspects of these claims.] 3
- The GUP claims that Caltrain usage will offset growth in daily employee road commuting are naive given that Caltrain is already at full capacity and can only practically address a fraction of total employee commuters. 4
- The GUP totally disregards the looming and alarming transportation and traffic congestion problems that will be created by imminent Caltrain electrification, increased traffic stops, and the likelihood of grade separation construction at various intersections, which will only add to the City's financial and traffic burdens. 5
- The GUP is absent any rigorous traffic impact analysis along the impacted main and secondary impacted corridors already strained by Stanford-bound traffic, including Embarcadero and University, as well as Churchill and Kellogg avenues. 6

We need to stop giving Stanford *carte blanche* rights to development in our community without making them carry the fair share of the financial burden needed to fund Palo Alto's

transportation infrastructure that their growth requires. I propose that the County require Stanford to fund the following specific projects to offset their impact ***prior to the approval*** of the Stanford 2018 GUP:

1. Stanford should be required to work with the City on mutually agreeable traffic mitigation solutions.
2. Stanford should be required to fund Caltrain grade separation projects at the Churchill and Embarcadero intersections with Alma given that they're already at capacity and will become unmanageable with the proposed Stanford expansions.
3. Stanford should be required to fund the construction of pedestrian underpasses at Embarcadero Rd and Palo Alto H.S. given the already precarious danger facing students by Stanford-bound traffic, as well as the traffic congestion caused by the existing light.
4. Stanford should be required to fund the expansion from 3-lanes to 4-lanes on the 300 yard stretch of the Embarcadero Road underpass, which already causes gridlock at rush hour and will only be further exacerbated with more traffic flowing inbound/outbound of Stanford.
5. Stanford should be required to pay for the addition of left-turn traffic signals at the intersection of the Embarcadero Road Underpass and Alma road to facilitate the safe onramp/offramp of inbound/outbound traffic to Stanford along the Alma corridor.

Please hold Stanford accountable for these significant infrastructure investments prior to any approval consideration for the 2018 GUP. The City and County can not endure the proposed growth without holding firm to that requirement.

Regards

Jason Matlof

Palo Alto, CA 94301

7
cont.

5.2.3.104 Responses to Comments from Jason Matlof

- I-Matlof1-1 Please see Response to Comment I-Hung-1.
- I-Matlof1-2 Please see Response to Comment I-Hung-2.
- I-Matlof1-3 Please see Response to Comment I-Hung-3.
- I-Matlof1-4 Please see Response to Comment I-Hung-4.
- I-Matlof1-5 Please see Response to Comment I-Hung-5.
- I-Matlof1-6 Please see Response to Comment I-Hung-6.
- I-Matlof1-7 Please see Response to Comment I-Hung-7.

Comment Letter I-Matlof2

From: [Jason Matlof](#)
To: david.radar@pln.sccgov.org; [Rader, David](#)
Subject: Opposition to the Stanford 2018 GUP from Palo Alto Resident
Date: Wednesday, January 24, 2018 12:21:40 PM

TO: County of Santa Clara, Department of Planning and Development

ATTENTION: David Radar, County Government Center

RE: STANFORD 2018 GUP

Dear Mr. Rader

Please consider this a formal response to the Stanford GUP and opposition to that proposal. As a 22-year tax-paying Santa Clara County and City of Palo Alto resident (as well as lifelong Northern Californian), I'm deeply disturbed by the implications of the Stanford 2018 GUP proposal.

While the community recognizes the University's great intellectual and cultural contribution to the *broader S.F. Bay Area community*, our small city (Palo Alto) can not be expected to endure the impact and costs of the dramatic infrastructure requirements that would be required to sustain the proposed growth at acceptable traffic, environment and safety levels. Stanford must pay for the requisite infrastructure improvements prior to the approval of the 2018 GUP. The institution is growing well beyond our means. I urge you to stop all further development by Stanford until infrastructure and impact analysis is completed and requirements are placed upon Stanford to fund the necessary infrastructure improvements that would make their GUP proposals truly "**no net impact**" to our community.

Specifically, I find the following concerns with the 2018 GUP:

- Stanford's proposal should not be considered in isolation of the **significant existing transportation and traffic congestion problems** that the City of Palo Alto is already experiencing given the large imbalance between local jobs vs. locally employed residents. This ratio is one of the highest in the country, and contributes to an already existing traffic dilemma in our small residential community. 1
- University growth should not be considered in isolation given that it is tied to the Stanford University Medical Center (SUMC), the Stanford Research Park (SRP), Stanford Shopping Mall, SLAC, including the development proposed for 500 El Camino Real in Menlo Park (429,000 SF of office, retail and housing). Looking at each site in isolation does not provide a full picture of the cumulative impacts to Palo Alto. 2
- The GUP claim of "No Net New Commuter Trips" is naive given the millions of square feet of development proposed. [Many reports detail the naive and poorly formed aspects of these claims.] 3
- The GUP claims that Caltrain usage will offset growth in daily employee road commuting are naive given that Caltrain is already at full capacity and can only practically address a fraction of total employee commuters. 4
- The GUP totally disregards the looming and alarming transportation and traffic congestion problems that will be created by imminent Caltrain electrification, increased traffic stops, and the likelihood of grade separation construction at various intersections, which will only add to the City's financial and traffic burdens. 5
- The GUP is absent any rigorous traffic impact analysis along the impacted main and secondary impacted corridors already strained by Stanford-bound traffic, including Embarcadero and University, as well as Churchill and Kellogg avenues. 6

We need to stop giving Stanford *carte blanche* rights to development in our community without making them carry the fair share of the financial burden needed to fund Palo Alto's transportation infrastructure that their growth requires. I propose that the County require Stanford to fund the following specific projects to offset their impact **prior to the approval** of the Stanford 2018 GUP: 7

1. Stanford should be required to work with the City on mutually agreeable traffic mitigation solutions.
 2. Stanford should be required to fund Caltrain grade separation projects at the Churchill and Embarcadero
- 

Comment Letter I-Matlof2

intersections with Alma given that they're already at capacity and will become unmanageable with the proposed Stanford expansions.

3. Stanford should be required to fund the construction of pedestrian underpasses at Embarcadero Rd and Palo Alto H.S. given the already precarious danger facing students by Stanford-bound traffic, as well as the traffic congestion caused by the existing light.
4. Stanford should be required to fund the expansion from 3-lanes to 4-lanes on the 300 yard stretch of the Embarcadero Road underpass, which already causes gridlock at rush hour and will only be further exacerbated with more traffic flowing inbound/outbound of Stanford.
5. Stanford should be required to pay for the addition of left-turn traffic signals at the intersection of the Embarcadero Road Underpass and Alma road to facilitate the safe onramp/offramp of inbound/outbound traffic to Stanford along the Alma corridor.

Please hold Stanford accountable for these significant infrastructure investments prior to any approval consideration for the 2018 GUP. The City and County can not endure the proposed growth without holding firm to that requirement.

Regards

Jason

7
cont.

5.2.3.105 Responses to Comments from Jason Matlof

- I-Matlof2-1 Please see Response to Comment I-Hung-1.
- I-Matlof2-2 Please see Response to Comment I-Hung-2.
- I-Matlof2-3 Please see Response to Comment I-Hung-3.
- I-Matlof2-4 Please see Response to Comment I-Hung-4.
- I-Matlof2-5 Please see Response to Comment I-Hung-5.
- I-Matlof2-6 Please see Response to Comment I-Hung-6.
- I-Matlof2-7 Please see Response to Comment I-Hung-7.

Comment Letter I-McGoldrick

Mike-Debra McGoldrick.
Full Name / Nombre Completo: _____ Date / Fecha: 1-28-17

Email Address (optional) / Correo Electrónico (opcional):

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

H.V.S

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

my concern is can the city of
cast palo alto donate a lot
where H.V.S can park in
cast palo alto, affordable rate
who are part of the community
Because of the rising housing
~~rent~~ market, we have employment
in cast palo alto

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In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuándo determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
2
- ☒ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
3
- ☒ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
4
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
5
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.
6

5.2.3.106 Responses to Comments from Mike-Debra McGoldrick

I-McGoldrick-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-McGoldrick-2 Please refer to Response to Comment O-SCOPE-15.

I-McGoldrick-3 Please refer to Response to Comment O-SCOPE-10.

I-McGoldrick-4 Please refer to Response to Comment O-SCOPE-3.

I-McGoldrick-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. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and is considering the adoption of an impact fee for any Stanford academic development.³⁴

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

I-McGoldrick-6 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

³⁴ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Comment Letter I-McNally

From: [Dave McNally](#)
To: [Rader, David](#)
Subject: oppose Stanford growth plans
Date: Friday, February 2, 2018 2:13:26 PM

Dear Mr. Rader,

I have lived on [REDACTED] in Menlo Park since September 1998, almost 19 years now. During morning and afternoon commute hours over the past several years the traffic on Alpine Road is so heavy that exiting Bishop Lane, turning either right or left, has become dangerous. I and many others who live on Bishop Ln, Homer Ln, Snecker Ct, and parts of Alpine experience the same thing: we sit there, often for several minutes, waiting for an opening, then we more or less punch it, to get out on to Alpine and on our way. Stanford's planned 3,150 additional housing units, which translates to 9,600 more people in the neighborhood, will only make this bad situation worse, probably significantly worse.

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I strongly oppose the Stanford growth proposal.

Thank you for your consideration.

Dave McNally

[REDACTED]
Menlo Park, CA 94025

[REDACTED]

5.2.3.107 Responses to Comments from Dave McNally

I-McNally-1 The comment regarding existing traffic congestion on Alpine Road is noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, and Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

Comment Letter I-Melamed

From: [carol melamed](#)
To: [Kumar, Kavitha](#); [Supervisor Simitian](#); [Rader, David](#); [Girard, Kirk](#)
Cc: [carol melamed](#)
Subject: Stanford's proposed GUP
Date: Saturday, January 27, 2018 4:07:26 PM

Dear Sir/Madam:

My husband Doug and I have been Palo Alto residents for 8 years. We are both lawyers, and he has taught at Stanford Law School for the past several years.

Having moved here from Washington, DC, we especially appreciate the value of the open spaces around Stanford. The Dish has become our treasured go-to walking trail.

We also appreciate the needs of the University to continue the significant development that it has undertaken over the past years. Its current request for an additional 3.5 million square feet of development is understandable.

We hope that the need for more development will be balanced with an equally important need to protect existing open spaces. Legalities aside, the relevant open spaces contribute considerably to the lives of all of us who live here. It is in the public interest for Stanford to dedicate a permanent conservation easement over the Foothills District -- this would mitigate the increased density that has already occurred and will occur with the additional 3.5 million square feet of development. This is the best result for everyone who lives and/or works here.

Very truly yours,

Carol Melamed



Palo Alto, CA 94301

1

5.2.3.108 Responses to Comments from Carol Melamed

I-Melamed-1 A comment is made requesting a permanent conservation easement over the Foothills District.

No changes to the existing Academic Growth Boundary location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.

No specific Project or cumulative impacts are identified in the Draft EIR that require permanently setting aside open space land as mitigation for increased density on-campus. However, these comments will be considered by County decision-makers prior to considering Project approval.

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

Comment Letter I-Meyer

From: [Elaine Meyer](#)
To: [Rader, David](#)
Subject: Fwd: Returned mail: apologies for the typo
Date: Saturday, February 3, 2018 2:04:05 PM
Attachments: [part2.dat](#)

----- Original Message -----

Subject: Returned mail: see transcript for details
Date: Sat, 3 Feb 2018 00:08:54 +0000
From: Mail Delivery Subsystem <MAILER-DAEMON>
To: [REDACTED]

The original message was received at Sat, 3 Feb 2018 00:08:53 +0000
from c-73-170-241-39.hsd1.ca.comcast.net [73.170.241.39]

----- The following addresses had permanent fatal errors -----

(reason: 550 5.4.1 [dave.rader@pln.sccgov.org]: Recipient address rejected: Access denied
[DM2GCC01FT004.eop-gcc01.prod.protection.outlook.com])

----- Transcript of session follows -----

... while talking to pln-sccgov-org.mail.protection.outlook.com.:
>>> RCPT To:
<<< 550 5.4.1 [dave.rader@pln.sccgov.org]: Recipient address rejected: Access denied [DM2GCC01FT004.eop-gcc01.prod.protection.outlook.com]
550 5.1.1 ... User unknown

Final-Recipient: RFC822; dave.rader@pln.sccgov.org

Action: failed

Status: 5.4.1

Remote-MTA: DNS; pln-sccgov-org.mail.protection.outlook.com

Diagnostic-Code: @pln.sccgov.org; 550 5.4.1 [dave.rader@pln.sccgov.org]: Recipient address rejected: Access denied [DM2GCC01FT004.eop-gcc01.prod.protection.outlook.com]

Last-Attempt-Date: Sat, 3 Feb 2018 00:08:54 +0000

1

5.2.3.109 Responses to Comments from Elaine Meyer

I-Meyer-1 An email was submitted by the commenter to an incorrect County email address, and consequently the email was not received by the County. As a result, no comments were received by the County.

Comment Letter I-Michaela

Full Name / Nombre Completo: Michaela Date / Fecha: 1/25/18

Email Address (optional) / Correo Electrónico (opcional):
[REDACTED]

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

Real Community Coalition

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

I am writing with my comments on Stanford's General Use permit for 2018: these concerns fall into a couple of categories:

1) Transportation considerations in regards to local community impact as well as environmental impact. The number of individuals in the VMT transportation impact over estimates the impact of students and underestimates that impact of workers. There are likely to be many more workers driving in the area than the analysis predicts. These numbers will influence predictions of environmental impact with greater green house emissions as well as impacts on the community.

2) Housing impacts on the community and the associated construction demands. The influx of 10,000 people over the years will continue to strain an already overcrowded area. The "linkage ratio" used to predict the necessary number of housing units is not proportional to the number of jobs necessary to pay the housing cost. The housing demands will likely be higher than the report predicts and therefore there will be greater strain on local communities and greater environmental impact as a result of construction.

3) ~~Emissions~~ ^{Emissions} will likely be higher than the report predicts as public transportation cost continue to be disproportionately high to people's income. Without ~~through~~ robust transportation cost support for workers and greater access to sustainable transportation, ~~emissions~~ emissions will continue to increase past predicted levels.

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuando determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
- ☒ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
- ☒ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

5.2.3.110 Responses to Comments from Michaela

- I-Michaela-1 Please refer to Response to Comment O-SCOPE-10.
- I-Michaela-2 Please refer to Response to Comment O-SCOPE-15.
- I-Michaela-3 Please refer to Response to Comment O-SCOPE-3.
- I-Michaela-4 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- I-Michaela-5 Please refer to Response to Comment O-SCOPE-15.
- I-Michaela-6 Please refer to Response to Comment O-SCOPE-10.
- I-Michaela-7 Please refer to Response to Comment O-SCOPE-3.
- I-Michaela-8 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and is considering the adoption of an impact fee for any Stanford academic development.³⁵
- Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- I-Michaela-9 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

³⁵ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Comment Letter I-Miller

From: [Bill Miller](#)
To: [Rader, David](#); city.council@cityofpaloalto.org
Subject: Comment regarding Stanford proposed expansion and GUP
Date: Tuesday, January 23, 2018 1:33:39 PM

For an institution with a worldwide reputation as a citadel of enlightenment, I'm surprised by how little creative, innovative thinking is applied when deciding what to do with Stanford's obscenely large endowment. Another billion dollars? Let's build more buildings! The result is a relentlessly metastasizing campus that cannot help but eventually overtax and degrade the surrounding community and environment.

With the gift of such funding, why not consider additional options? Offer more scholarships for underprivileged youth. How about funding more field research to transfer innovative medical and other technologies in the Third World? And if you simply must build, why not satellite campuses in disadvantaged communities? Or how about a demonstration city showcasing the latest in sustainability?

With all the current chaos in the world, do we really need yet another art museum with a billionaire's name on it?

Bill Miller

Palo Alto, CA

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5.2.3.111 Responses to Comments from Bill Miller

I-Miller-1 A general comment is made regarding Stanford development degrading the surrounding community and environment. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Personal opinions made in the comment do not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Milligan

From: [Valerie Milligan](#)
To: [Rader, David](#)
Subject: Comment on Stanford GUP 2018
Date: Tuesday, January 30, 2018 2:41:53 PM

To:

County of Santa Clara Department of Planning and Development

Attention: David Rader

County Government Center

70 West Hedding Street, San Jose, CA 95110

Phone: (408) 299-5779

Email: David.Rader@pln.sccgov.org

Dear Mr. Rader:

I am a 65-year resident of Santa Clara County and a 61-year resident of Palo Alto.

I would like to express how the City of Palo Alto and the County of Santa Clara are already too crowded with too many workers, not enough housing, and not enough surface streets or public transportation to handle any more development. This plan is especially distressing, as Stanford has added millions of square feet since 2007, and I was led to understand that that was supposed to be final. I am saddened to see my beloved city, county and state being ruined by overdevelopment

1

Best regards,
Valerie Milligan

[REDACTED]

Palo Alto, CA 94306

[REDACTED]

5.2.3.112 Responses to Comments from Valerie Milligan

I-Milligan-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Miranda

Full Name / Nombre Completo: Roger Miranda Date / Fecha: 1/28/18

Email Address (optional) / Correo Electrónico (opcional):

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

We need to make the corporate aware
of the reality that the county is
living. Stanford can help to the
community by building ^{housing for} extreme
low income people

1

Thank you!

Roger

5.2.3.113 Responses to Comments from Roger Miranda

I-Miranda-1 The comment makes a general request for Stanford to build more affordable 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.

Please also see Master Response 10: Affordable Housing.

Comment Letter I-Morales

Full Name / Nombre Completo: Adela morales Date / Fecha: 01-28-18

Email Address (optional) / Correo Electrónico (opcional):

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

RVS

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

los pedimos a Stanford que nos ayude en cuestion de vivienda para las RV's las rentas en las polo alto estan muy caras necesitamos viviendas para las que vivimos en RV's o un terreno para parking tambien nos quieren rentar con niños pedimos que sea algo seguro con un terreno para parking de nuestras RV's

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Comment Letter I-Morales

I-Morales

Spanish to English translation of letter:

We ask of Stanford that they support us in regards to RV housing. East Palo Alto rents are very high. We need housing for those of us living in RVs or in a parking lot. No one wants to rent to us. With kids we need something secure with space for parking our RVs.

Comment Letter I-Morales

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuando determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
- ☒ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
- ☒ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

Adela Morales Dominguez

5.2.3.114 Responses to Comments from Adela Morales

I-Morales-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Morales-2 Please refer to Response to Comment O-SCOPE-15.

I-Morales-3 Please refer to Response to Comment O-SCOPE-10.

I-Morales-4 Please refer to Response to Comment O-SCOPE-3.

I-Morales-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. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and on September 25, 2018 adopted of an impact fee (of \$68.50 effective July 1, 2020) for any Stanford academic development.³⁶

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

I-Morales-6 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

³⁶ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Comment Letter I-Moran

From: [Jeralyn Moran](#)
To: [Rader, David](#)
Subject: comments to Joe Simitian r.e. the Stanford GUP DEIR
Date: Tuesday, January 23, 2018 12:02:35 PM

To: Supervisor Joe Simitian, Santa Clara County

Subject: Stanford GUP DEIR

Dear Supervisor,

Thank you for offering the Public Meeting at the Palo Alto City Hall on Tuesday January 23, 2018 - I am sorry to have a scheduling conflict, and cannot attend.

I want to convey my concerns about the lack of adequate Campus and/or greater local Community housing in the plan to accommodate the anticipated (large) influx of students, employees, visitors and others that will result from this additional campus development.

1

Palo Alto's commitment to mitigating Climate Disruption necessitates reducing the number of forced daily commutes into and out of the City; this inevitably includes the Stanford Campus. Progress is slowly being made on this front, but cannot keep up if housing is not a top priority in Stanford's Plan as it is now with Palo Alto.

2

Climate Disruption is a time sensitive, major issue that is and will increasingly impact us all – no exclusions. The County's mindful shepherding of the current Stanford GUP with this in mind will be rewarded by appreciation from our future leaders and citizens.

Sincerely,

Jeralyn Moran

 Palo Alto

--

..... the Time for Climate Action Is **Now**.

5.2.3.115 Responses to Comments from Jerilyn Moran

I-Moran-1 A general comment is made about a lack of adequate campus or community housing to accommodate the Project population growth.

Please see Draft EIR Section 5.12 Population and Housing which addresses all Project and cumulative population and housing impacts associated with the construction and operation of the proposed Project.

Please also note that 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.

I-Moran-2 Regarding comments made regarding climate change, the Draft EIR, Section 5.7 Greenhouse Gas Emissions addresses all Project and contribution to cumulative effects related to greenhouse gases associated with the construction and operation of the proposed Project.

Comment Letter I-Morris

From: [T. Morris](#)
To: [Rader, David](#)
Date: Thursday, February 1, 2018 3:37:41 PM

February 1, 2018,

Dear Mr. Rader,

Re: Draft Environmental Impact Report (DEIR) for the new Stanford General Use Plan (GUP)

I was shocked at the amount of growth I saw when I had to visit a relative at Stanford Hospital this past week! The changes are a bit mind-boggling and the traffic is appalling. To that point, I would like to voice my great concern over the latest proposed growth from Stanford. It is far too much for the area to absorb, both traffic and housing wise. Also, the fact that Stanford does not pay its fair share of taxes because of their legal status means the impacts come at great expense to the tax payers near and far. This is unfair! Please find ways to reduce their growth, or at least slow it down and to have them pay (the millions) to support the infrastructure that is so deeply affected by their growth.

At the rate of growth they are proposing, we just might have to rename all of Palo Alto to Stanford Park, or something similar.

Thank you for your attention to my concerns.

Sincerely,

Teresa Morris

(Former resident of Palo Alto, Frequent business supporter of Palo Alto businesses and now resident of Los Altos.)

1

5.2.3.116 Responses to Comments from Teresa Morris

I-Morris-1 Please see Draft EIR Section 5.12, Population and Housing, and Section 5.15, Transportation and Traffic, which addresses all Project and cumulative population and housing and traffic impacts associated with the construction and operation of the proposed Project.

Please also note that 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.

With respect to the Project effect on property taxes, please note that socioeconomic effects such as property tax effects are outside the scope of CEQA, and consequently are not addressed in this EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Moss

From: [Robert Moss](#)
To: [Rader, David](#)
Subject: Stanford Request for General Use Permit Approval
Date: Wednesday, January 31, 2018 11:03:48 AM

Dear Mr. Rader;

One factor in the GUP request that Stanford never has addressed is why they selected the amount of new office and support space that is being requested. A ignored were questions about the number of residential units proposed and what is meant by referring to location of many of those units off campus? I asked for an explanation or justification of the size of the expansion and what traffic impacts of this development would beat public meetings, and the question was ignored. Stanford claims that the development will not increase traffic, but they limit traffic counts to 1 hour in the morning. IN the past Stanford has told people coming to campus to drive in after 10 AM and leave before 4 PM so that their car trips won't be counted.

1
2

The GUP should not be approved until Stanford has fully explained and justified the need for the scale of proposed expansion, and what all day traffic impacts will be, not just those during rush hour in the morning. They also must be required to place housing for the new workers on campus, not in nearby communities.

3
4

Regards, Robert Moss

5.2.3.117 Responses to Comments from Robert Moss

I-Moss-1 The amount of development requested is to achieve the project objectives; please refer to the Project Objectives in the Draft EIR Chapter 3 Project Description, on pages 3-1 to 3-2.

With respect to the comments made regarding housing, the number and distribution of proposed new on-campus housing units/beds under the 2018 General Use Permit is also discussed in the Draft EIR Project Description, beginning on page 3-18. Please also refer to Section 5.12, Population and Housing, which addresses the off-campus housing demand that would occur under the Project.

Please also note that 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 the 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.

I-Moss-2 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Moss-3 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Moss-4 Please see Response to Comment I-Moss-1, above.

Comment Letter I-Narang

From: [Subhash Narang](#)
To: [Rader, David](#)
Subject: Stanford GUP 2018 comments
Date: Wednesday, January 31, 2018 9:26:58 AM

I am very concerned about the upcoming release of the silt from the dam to the creek. Stanford needs to collect the silt and dispose it off properly in a landfill instead of killing aquatic species in the water flowing through the creek.

1

The obscene amount of endowment does provide Stanford the opportunity to be a model "Citizen", leading by example, for the health and happiness of fellow citizens in the surrounding cities by mitigating extra environmental pollution, removing/mitigating the burden of additional housing, schooling (space and staff) and traffic congestion.

2

5.2.3.118 Responses to Comments from Subhash Narang

I-Narang-1 The Draft EIR Section 5.9, Hydrology and Water Quality, page 5.9-7 discusses that Searsville Dam has intercepted coarse sediment transport in San Francisquito Creek, which has resulted in erosion and other changes to the stream, and reduced fine sediment transport, affecting water quality. However, the dam and related sediment issues are not associated with either the Project site or the proposed 2018 General Use Permit, and therefore did not require analysis in the Draft EIR.

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

I-Narang-2 Due to lack of specificity in the comment, and the fact that this comment does not specifically address the Project or the Draft EIR, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please see Draft EIR Section 5.9, Hydrology and Water Quality, Section 5.12, Population and Housing, Section 5.13 Public Services, and Section 5.15 Transportation and Traffic which addresses all Project and cumulative impacts related to hydrology and water quality, housing, public schools and traffic associated with the construction and operation of the proposed Project.

Please also note that 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.

Comment Letter I-Neville

From: [Susan Neville](#)
To: city.council@menlopark.org; [Rader, David](#); gup@univpark.org; plngbldg@smcgov.org
Subject: Concerned Response to Stanford GUP
Date: Monday, January 22, 2018 1:56:07 PM

To Whom It May Concern,

I am opposed at this time to the GUP as put forward by Stanford. I do not believe the surrounding areas of Menlo Park and Palo Alto can absorb the traffic and additional public services needed by increasing the number of people coming to Stanford. The impact of the associated construction plans is staggering. I live one block off of El Camino Real in northern Menlo Park. During peak hours it can take 10 minutes to drive one block on El Camino. I anticipate the grid lock will get worse with the many developments already approved that face El Camino. I don't see any solution to the traffic problem in the Stanford GUP. Ideally the University would look at opening up other roads to and from campus (across the creek) so that residents of Menlo Park do not have to rely only on ECR. My understanding of the No New Net Commuters is that it does not take into account visits to campus for non-academic reasons. That makes it a meaningless measure.

1

2

I am happy to have Stanford as a neighbor. I am an alum and I continue to work with the University. I am though very concerned about the scale of these plans. In my view, the campus density has grown too quickly - allowing very little room for future generations to create a blueprint that works for them. I would vote to curtail the present plans until there is a very reliable plan in place for traffic control and for absorbing the impact of construction.

3

Sincerely,

Susan C Neville

[REDACTED]

Menlo Park, CA. 94025

5.2.3.119 Responses to Comments from Susan Neville

I-Neville-1 Existing traffic congestion on El Camino Real is noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, and Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual 2018 General Use Permit projects.

The 2018 General Use Permit EIR is a program-level evaluation, and does not specifically consider individual projects. As such, construction impacts are addressed at a programmatic level. Project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at the time they are proposed to determine whether the environmental effects of the specific project were adequately disclosed in the 2018 General Use Permit Program EIR. Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

Please also refer to Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives for the discussion of a new roadway connecting I-280 to Stanford.

I-Neville-2 All trips to the Stanford campus are included in the cordon counts, whether the trips are for academic or other purposes. The cordon is established at the 16 campus gateways. See Figure 5.15-2 of the Draft EIR which illustrates the cordon count locations. The methodology for the cordon counts is explained in the County's annual traffic monitoring report. The only trips that are excluded from the cordon counts are the cut-through trips and people who are accessing Stanford Healthcare facilities in Palo Alto, but are parking in University parking lots. The healthcare facilities in Palo Alto are not subject to the General Use Permit, and are within the jurisdiction of the City of Palo Alto. Please also refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New

Commute Trips Standard for additional information on deductions for cut-through trips.

I-Neville-3 A general comment is made opposing the Project due to the need for a reliable plan for traffic control and for absorbing the impact of construction. Due to the lack of specificity in this comment, no specific response is possible. 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 on study area roadways. Please also see Master Response 13: Transportation and Traffic.

Comment Letter I-Newman

From: [Susan Newman](#)
To: [Rader, David](#)
Subject: Stanford development concerns
Date: Friday, February 2, 2018 10:10:46 PM

Dear Mr. Radner,

Having reviewed many of the comments already submitted to your office, I feel that the County has in hand excellent guidance about the concerns of people from the communities most affected by Stanford's proposed development. I generally agree with many of those comments, particularly with respect to the effects of the development on traffic and affordable housing. I'm focusing my comments on the mitigations spelled out in the Mitigation Monitoring and Reporting Program (14) and propose the county strengthen the requirements on Stanford in a few specific ways:

- Using the currently specified cordon around Stanford as the boundary for then mechanically monitoring net commuter trips *onto campus* seems seriously inadequate as a measure of effects on traffic and parking congestion *in the area*. As a member of an adjacent neighborhood, I have witnessed firsthand the practice of Stanford employees parking somewhere along a Marguerite route and taking the shuttle into work. This might be acceptable were it not for the fact that Palo Alto's parking resources are already stretched to the limit, and that parking is often difficult for *residents* to come by. Aside from the effects on parking in Palo Alto (and Menlo Park), increased commuter traffic into these cities as new workers come to and leave Stanford creates stressful traffic snarls and delays for people who live in these communities. Additional traffic and parking, not accounted for by the current methods, may make these situations intolerable.

As a result, I urge the County to require (and to develop with Stanford) a more contextually sensitive means of monitoring commuter traffic resulting from the new development. I admit I don't have a ready-to-hand solution to the problem of monitoring increases. While it might be possible to quantify increased traffic coming into the Palo Alto and Menlo Park from, for example, I-280 and 101, I don't know how it could be traced to Stanford, unless Stanford is asked to keep track of the the last 4 digits of the license plate numbers of employees and helps pay for the installation of license plate monitoring at the major points of entry to the communities (Page Mill Road, Embarcadero and Oregon Expressway, Sand Hill Road, etc.) in addition to, or rather than, at the points of entry to the cordon. Alternately, perhaps increases in the usage of Marguerite onto and off campus at the start and end of the workday could be monitored. Or perhaps questionnaires could be administered to Stanford employees concerning how they arrive at work. Whatever the method, we need to know not whether Stanford campus is experiencing a net increase in commuter trips, but whether the area surrounding Stanford campus is more congested as a result of Stanford's growth and by how much. Had something like this been in place during the last phase of development at Stanford, we would all be in a much better position to evaluate the advisability of allowing the current GUP to go through or to recommend modifications to the plan. Let's not make the same mistake again.

If it is determined, as it almost certainly will be, that Stanford's growth is resulting in increased traffic congestion in the surrounding areas, then the same requirement mentioned in TR-6A (mitigation of cut-through traffic) should be imposed, with Stanford contributing proportionately to necessary mitigation. In fact, if mitigation of congestion for the entire area is achieved, it may not be necessary to carry out TR-6A, since reducing the number of drivers in the area hurrying to and from work at Stanford will automatically reduce neighborhood cut-throughs. Actual mitigation of congestion for the area would also obviate the need for the complicated math assessing how many trips onto campus are pass-throughs and how many have campus as the destination. Trying to isolate the effects on Stanford traffic from the effects on the entire area both complicates the problem and obscures the real issues.

It should be clear from the preceding that I disagree with the premise in TR-5B that the County has all the responsibility for monitoring Stanford's *actual* trip reduction in the area, defined as implementing new and existing TDM measures (whatever they are). This should not be the case. Stanford should have to contribute both to employing traffic reduction measures *and* to the assessment of their success in controlling increases in commuter traffic beyond its own boundaries.

- The idea of having Stanford participate cooperatively with the surrounding communities in trip reduction programs

Comment Letter I-Newman

is a good one. However, before the County agrees to Stanford's development plans, we should spell out appropriate programs and *require* Stanford to put forward specific resources to help establish these programs. I understand that this aspect of mitigation is probably left vague because it depends upon cooperation with the neighboring communities, who may or may not prioritize trip reduction programs in their expenditures and planning. However, given the substantial impact that Stanford's development is likely to have, is it not possible to require cooperative planning of trip reduction programs as a precondition of accepting the GUP? If the cities involved understood the need and opportunity for collaboration with a paying partner like Stanford, might they not be motivated to engage in some upfront planning for trip reduction?

4
cont.

- I agree with the principle behind GI-1, that developing additional affordable housing in the adjacent communities would be an important step toward mitigating traffic and parking concerns. However, I find the requirements on Stanford to support this effort to be inadequate. Rather than requiring Stanford to "develop regulatory mechanisms that create incentives for Stanford to participate in off-campus housing initiatives", the County should simply *require* them to participate by providing either money or land for affordable housing development. Indeed, one (perhaps too neat) solution to the problem of increased density with its effects on traffic and housing is to require Stanford to provide housing for *all* its new employees *on Stanford land*. If the land is not contiguous with the campus, they should then be required to provide private mass transit from those housing developments to jobs on campus. I don't know if this is feasible or desirable, but it certainly puts responsibility where it belongs — responsibility for mitigating the effects of development needs to rest in substantial part on the developer rather than only on the overburdened governments of encompassing communities.

5

Sincerely,
Susan Newman

Susan Newman
[REDACTED]
Palo Alto CA 94306
[REDACTED]

5.2.3.120 Responses to Comments from Susan Newman

I-Newman-1 Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for information on how the Draft EIR addresses Stanford affiliates parking off-campus, Topic 8: Neighborhood Street Impacts for information on how neighborhood streets were evaluated to determine potential impacts due to traffic generated by the proposed Project, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic. Also, please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard (Deduction for Cut-through Trips).

The Draft EIR (Impacts 5.15-2 and 5.15-9) discusses impacts at area intersections under 2018 Baseline conditions and 2035 Cumulative conditions on pages 5.15-74 to 5.15-95 and pages 5.15-112 to 5.15-136. The analysis considers off-site trip generation in the communities surrounding Stanford and presents mitigation to reduce the impact. The analysis is not limited to the campus boundaries.

I-Newman-2 See Response to Comment I-Newman-1.

I-Newman-3 See Response to Comment I-Newman-1.

I-Newman-4 Mitigation Measure 5.15-2 recognizes that the Community Plan includes a policy to provide credits toward Stanford's no net new commute trips standard for programs within the cordon credit area. Please refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a description of steps that would be taken if Stanford does not achieve the no net new commute trips standard.

It should be noted that during implementation of the 2000 General Use Permit, to date Stanford has not exceeded the no net new commute trips standard (taking into account trip reduction credits). Also, as discussed in Draft EIR Chapter 8, Special Considerations, Stanford has offered to fund four offsite bicycle improvement projects that, if implemented by jurisdictions with approval authority over the project, would provide a permanent inventory of trip reduction credits.

I-Newman-5 Impacts of the Project on housing affordability housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, 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. 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 10: Affordable Housing.

Comment Letter I-Ng1

From: [Nelson Ng](#)
To: [Rader, David](#)
Cc: [Cortese, Dave](#); [Chavez, Cindy](#); [Supervisor Simitian](#); [Wasserman, Mike](#); [Supervisor Yeager](#)
Subject: Stanford GUP EIR Comment
Date: Friday, February 2, 2018 10:01:49 AM

Dear My Rader,

My name is Nelson Ng. For the past 21 years, my family and I have lived on [REDACTED] a block south of Embarcadero in Palo Alto. In the past few years, traffic gridlock is a daily event in Palo Alto during commute hours on all of the major arteries such as Embarcadero, Alma and Page Mill. My family and I have a front row seat to experience all the traffic jams on Embarcadero. Like many Palo Alto residents, we have to alter our daily life to accommodate the traffic conditions. This has very negative impact to the quality of life for Palo Alto residents. Therefore, I am very concerned about the negative impact by the expansion of the Stanford GUP. Despite Stanford's claim of "No Net New Commuter Trips", I am appalled that the traffic problem will still be "Significant and Unavoidable" after mitigation as stated in section 5.15 Transportation and Traffic of the DEIR. Many developers in the past have used this myth of "No Net New Commuter Trips" to gain approval of their projects. The reality is Palo Alto is bombarded with major traffic increase due to these expansions.

As a long time resident fo Palo Alto, I feel the residents of Palo Alto are victims of the Stanford's continual growth. Although Stanford is a great institution and has put in place many traffic mitigations, the fact is the City of Palo Alto is already at a point that we cannot handle the current traffic load. Therefore, I am requesting the County of Santa Clara to reject Stanford's GUP proposal for expansion and require Stanford to work with the City of Palo Alto to improve the current traffic situation by providing funding to build out infrastructure such as housing, schools and train crossings before considering any proposal for future expansion. Given the geographic surrounding of Stanford, there is a physical limitation to growth that the neighboring cities can sustain. Therefore, any future expansion proposal must clearly state the ultimate maximum buildout for Stanford.

Sincerely

Nelson

5.2.3.121 Responses to Comments from Nelson Ng

I-Ng1-1 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. 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 mitigation measures 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. Santa Clara County cannot require Stanford to pay more than its fair share of the cost of intersection improvements.

I-Ng1-2 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comment Letter I-Ng2

From: [Nelson Ng](#)
To: [Cortese, Dave](#); supervisor.chavez@bos.sccgov.org; [Supervisor Simitian](#); supervisor.wasserman@bos.sccgov.org; [Supervisor Yeager](#)
Cc: City.council@cityofpaloalto.org; [Girard, Kirk](#); [Rader, David](#); [BoardOperations](#); [James Keene](#)
Subject: Request extension of comment period for Stanford GUP (General Use Permit)
Date: Thursday, November 30, 2017 6:22:11 PM
Attachments: [EmbarcaderoWestbound.png](#)
[EmbarcaderoEastbound.png](#)

Honorable Santa Clara County Board of Supervisors,

My name is Nelson Ng and I am a 21 year resident of Palo Alto. I worked in the Stanford Research Park in the early 80's and again the last 2 years. During the last 34 years, I have seen traffic grow to epic proportions of gridlock in Palo Alto during commute hours on all of the major arteries such as Embarcadero and Page Mill. Here is a picture that was taken last year on Embarcadero by Alma during the morning commute hour traveling westbound on Embarcadero. Another photo was taken during the afternoon commute hour going eastbound on Embarcadero. This congestion occurs daily on Palo Alto's major roads and significantly and negatively impacts the quality of life for the residents of Palo Alto. Given that the traffic is already at gridlock level, we should be looking for solutions to reduce the traffic instead of considering expansion that will add to the problem. Let us implement measurably effective solutions before going forth with any plans for additional growth.

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The following is from section 5.15 Transportation and Traffic of the DEIR.

Significance after Mitigation: Significant and Unavoidable.

This mitigation would substantially reduce traffic congestion impacts to intersections; however, this is considered a significant and unavoidable impact because it is uncertain whether it would be feasible to improve some of the affected intersections if the No Net New Commute Trips standard is not achieved, if there are not sufficient additional funds to complete the intersection impacts, or if there are not sufficient off-campus projects available to reduce peak hour traffic. As discussed in further detail below, many of the intersections adversely affected under 2018 Baseline with Project conditions identified in Table 1, above, are located in other jurisdictions, and consequently, the improvements depend on the actions of those jurisdictions. In some cases, additional funding for intersection improvements may be required and is not yet identified, and consequently, it is not certain that these improvements would be implemented in a timely manner. For these reasons, the impact would remain significant and unavoidable.

2

It is not acceptable for the citizens of Palo Alto that the traffic impact could be Significant and Unavoidable even after the mitigation. Therefore, I am requesting the Board of Supervisors to grant a 60 days extension to allow the City of Palo Alto to provide more complete and in-depth comments on the DEIR to ensure there will be measurable goals and effective mitigation for traffic impacts.

3

Sincerely,

Nelson Ng



5.2.3.122 Responses to Comments from Nelson Ng

- I-Ng2-1 This comment is in regard to an existing traffic condition, not related to the environmental impacts of the proposed Project. The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- I-Ng2-2 The Draft EIR’s conclusions that certain traffic impacts are significant and unavoidable are supported by substantial evidence presented in the Draft EIR. The County Board of Supervisors may approve a project with one or more significant unavoidable impacts, if it concludes that the unavoidable environmental damage from the project is acceptable when balanced against the project’s benefits. In this case, the County Board of Supervisors would be required to adopt a statement of overriding considerations when it approves the project detailing why specific economic, legal, social, technological, or other benefits override the Project’s significant adverse impacts. (Public Resources Code Section 21081(b); CEQA Guidelines Section 15093).
- I-Ng2-3 The County elected to extend the public comment period on the Draft EIR to February 2, 2018.

Comment Letter I-Nosanchuk

From: [Seth Nosanchuk](#)
To: [Rader, David](#)
Subject: Workers need affordable housing
Date: Tuesday, January 30, 2018 4:21:44 PM

Dear David Rader, Mr.

I am a Stanford student in my second year. Since I have moved here, I have made friends with Stanford workers, people in the area, and students who all have struggled to find and maintain affordable housing. There are many workers at Stanford who have to commute extremely long distances, and more and more people are being pushed out. This is not okay with me and my fellow students who believe that corporate and big money interests should not push people out of their homes. I stand with the working people who need affordable housing and think it is a vital aspect to add to the General Use Permit.

1

Sincerely,

Seth Nosanchuk

5.2.3.123 Responses to Comments from Seth Nosanchuk

I-Nosanchuk-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Please also see Master Response 10: Affordable Housing.

Comment Letter I-Oberhelman

From: [Leslie Oberhelman](#)
To: [Rader, David](#)
Subject: no idea if this is EIR relevant
Date: Thursday, November 9, 2017 10:58:24 AM

Stanford should be required as part of this expansion to construct low income housing units targeted for homeless in north county.

1

In addition, they should be required to contribute singificantly to expansion of public transit systems to mitigate the traffic nightmare in the area.

2

Thank you.
Leslie Oberhelman

5.2.3.124 Responses to Comments from Leslie Oberhelman

- I-Oberhelman-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, 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 10: Affordable Housing.

- I-Oberhelman-2 Pursuant to CEQA Guidelines Section 15127.4(D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.

Mary O'Kicki

- Palo Alto, CA 94301

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

Re: Comments on Stanford GUP Draft EIR

Dear Mr. Rader,

Please find my comments on Stanford GUP's Draft EIR below. I am a resident of Palo Alto and a member-at-large of the Stanford GUP Community Resource Group (CRG). As a member of the CRG, I not only attended a majority of the public meetings, but I also spoke with neighbors and others throughout my community so that I could best understand, and then communicate, their concerns about the Draft EIR and the Stanford GUP proposal. My comments reflect the concerns most frequently voiced which are mostly around housing, traffic and open space. I've added my personal comments as well and have notated them as such.

Traffic

Residents have repeatedly voiced two concerns regarding the traffic impacts analysis during public meetings. The first is that they believe that data collection should be done all day and not just during "peak" hours to better reflect the impact of cars coming and going to Stanford because residents believe that 1) there doesn't seem to be a "down" or "low" time of traffic at any time of the day anymore, so there is no true "peak"; and 2) all day would better reflect the varying schedules of students, staff and faculty at Stanford.

The second comment that has been voiced about the traffic analysis by residents is that they believe it is incomplete because it does not look at traffic on the side streets just off of the main thoroughfares. The Draft EIR itself states the following about my neighborhood, Crescent Park:

The neighborhood lies along University Avenue, which is a major access route to regional roadways such as US 101 and SR 84 (Dumbarton

Mary O'Kicki, Draft EIR comments

February 2, 2018
Page 1 of 8.

Bridge). There is existing congestion on the corridor that includes ***spillover traffic to parallel roadways*** (emphasis added) such as Hamilton Avenue. (Draft EIR, Volume 2, pg. 5.15-13)

The congestion along these parallel roadways and the cross streets that connect the parallel roadways to the main throughways is so congested at times in the area close to 101 that some residents are unable to back out of their driveways because commuters are just stuck, blocking them in, on these side streets. As one resident said at the January 23rd Public Comment meeting in Palo Alto, this phenomena has been nicknamed by local residents as "car-mageddon." He did point out that he was not saying that Stanford traffic was the cause of this phenomena, but rather that "car-mageddon" is an example of just how congested the traffic is in this area and the need for a more detailed analysis that includes some side streets.

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Therefore, in support of my community's concerns, I would like to request that the County consider asking Stanford to expand their traffic analysis to 1) include data collected throughout the day and not just during peak hours, and 2) to include data collected on select side streets that are likely to have overflow traffic from Stanford - which may, or may not, include the area where "car-mageddon" occurs. If the County does not believe this additional analysis is needed, can it provide its rationale?

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No new net trips/CalTrain Concerns

Analysis of the no new net trips program elicited comments from many residents. Even though the Draft EIR notes that OPR's *Technical Advisory on Evaluation Transportation Impacts in CEQA* advises that, "Lead agencies generally should not treat the addition of new users [...on public transportation...] as an adverse impact." (Draft EIR, Volume 2, pg. 5.15-155), residents voiced that the analysis "was overly relying on people using CalTrain when it was already at capacity." (paraphrase).

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Several residents requested that Stanford pay for upgrades to the impacted CalTrain Stations which may have more riders including paying for grade separation. Though as stated in the Draft EIR, OPR's recommends that such an impact "may be addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit." (Draft EIR, Volume 2, pg 5.15-155).

The Draft EIR's analysis is based on various assumptions including CalTrain's capacity, total anticipated ridership growth during the peak hours, and others (Draft EIR, Volume 2, pg. 5.15-(155-159)). In light of the numerous concerns voiced by residents regarding the capacity of CalTrain, and despite the advice by OPR to not consider an increase in public ridership to be an adverse impact, can the County please review the assumptions used and their sources and their validity or invalidity? Also can the County please provide some discussion regarding the rationale behind OPR's advice that an increase in ridership is not an adverse impact? Such an explanation could help readers understand why the analysis determined the potential impact of this criteria is "less than significant."

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Open Space/Stanford Foothills

The following comment is not specific to the Draft EIR, but rather addresses a larger concern raised by the GUP proposal and Stanford development in general and for that reason it is included here. Enormous concern has been voiced by residents that the Stanford Foothills, though not proposed for development at this time, will be developed in the near future given the looming expiration in 2025 of the required four-fifths vote needed by the County Board of Supervisors to allow expansion of the Academic Growth Boundary. After 2025, a simple majority vote is needed to allow development.

I would like to submit for the record the comment that many residents have voiced that they would very much like to have the Stanford Foothills remain undeveloped and would also like the four-fifths vote requirement by the County Board of Supervisors to remain in effect well past 2025 – for at least another 25 years.

I would also like to state my support for maintaining the Stanford Foothills as a conservation and recreation area. I believe that leaving them undeveloped is supported by the policies outlined in The Stanford Community Plan as well as institutional goal number two of Stanford's Habitat Conservation Plan (HCP) which states: "maintain and enhance biological resources (i.e., native biodiversity) on University lands so that these resources can be utilized by future generations of students and faculty researchers." The Stanford Foothills have become a biologically diverse habitat and an important part of the ecosystem and I support all efforts to maintain the integrity of them.

6

On a personal note, I moved here in 1998. At that time dogs were allowed in the Stanford Foothills and there were no paved paths or security on site. Twenty years later, it is very gratifying to see all the wildlife - from red-tailed hawks to the occasional heron - who resides or rests there now. The Stanford Foothills is a favorite walking path for bird watchers and wildlife enthusiasts alike.

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cont.

Bird Safe Building Guidelines

One community member commented at the January 23rd meeting about the importance of developing and implementing bird safe building guidelines to help prevent birds from colliding with glass windows which results in injury and/or death. Such guidelines are supported by The Audubon Society and are in place in the cities of Oakland and Sunnyvale. Though the Draft EIR examines the project's potential impact on special-status and migratory birds (for which it found impacts could be "potentially significant."), it does not indicate that colliding with a glass window was considered. Even if special-status and migratory birds may not be at risk for colliding with glass windows, some native birds are. Therefore, I would like to state my support for Stanford developing and implementing bird safe building guidelines for all new building projects.

7

Monarch Butterflies and other Pollinators

I am personally involved –as are many others throughout Palo Alto, Menlo Park and other nearby communities– in efforts to save the monarch butterfly from extinction. The monarch butterfly is currently being considered by the USFWS for listing under the Endangered Species Act. See:

<https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=10W1>

Unfortunately, a report funded by USFWS indicates that the monarch butterflies are running out of time. The report found that, "current trends indicate an extinction risk of 72% in 20 years and 86% in 50 years." The decline is linked directly to human development. See:

<https://ecos.fws.gov/ecp0/profile/speciesProfile?spcode=10W1>

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Because the monarch butterfly is not currently protected by the ESA, Stanford's HCP does not require Stanford to take any actions to minimize or mitigate the potential impact of its activities on the monarch butterfly. However, because the butterfly's possible extinction is so near, I urge the County to ask Stanford to act before it is required to do so by the federal government and implement an action plan now to help revive the monarch butterfly population and save them from extinction. Not only would this action be in line with Stanford Community Plan's policies and goals and the Stanford HCP's stated goals and policies, it is an opportunity to join – or lead – community

efforts to save this important butterfly. Wildlife does not recognize political boundaries and working to save the monarch butterfly could be a wonderful community outreach and neighborhood building opportunity. Please request that the EIR look at the project's potential impact on the monarch butterfly.

Similarly, I would urge Stanford to consider banning the use of neonicotinoids and other pesticides that have been proven to be responsible for the decline of many of our insect pollinators. See: <https://xerces.org/neonicotinoids-and-bees/>

Housing

It's not possible to overstate the housing crisis not only here in Silicon Valley, but throughout the Bay Area and much of California. Many, many comments have already been submitted and voiced by residents from all the communities, including mine, potentially impacted by Stanford's proposed development. Therefore, I am going to only provide my own comments on this important topic.

Regarding the Draft EIR, I have two specific comments. The first is that although the EIR discusses the anticipated change in populations and how the housing needs of this additional population will be met, what it doesn't discuss is what is the current housing deficit? That is, what number of current graduate students, post-docs, and other affiliated populations are still in need of housing and how are these current needs going to be met? See Table 5.12-9 on page 5.12-15 of Volume 1 of the Draft EIR.

If currently, there are affiliated populations that are without housing, then these numbers need to be added to the analysis so that the reader can get a complete picture of the present and future housing situation.

Second, throughout the discussion of affiliated populations only seven categories are listed both in the discussion and in the tables. These populations include: undergraduate students, graduate students including PhDs, postdoctoral students, faculty, on-campus staff, non-matriculated students and other workers. Yet, on page 5.12-15 of Volume 1 of the Draft EIR, the last paragraph states, "The proposed 2018 General Use Permit would allow 3,150 net new housing units/beds, of which up to 550 units would be available for faculty, staff, postdoctoral scholars and **medical residents**" (emphasis added). It is the first time in the discussion that I saw medical residents mentioned. Are

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they a sub-group of one of the seven categories of affiliated populations or are they a separate category? If separate, what percent of the 550 units will be made available to them?

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Finally, I would like to state that I am supportive of Stanford providing housing for all of its undergraduate and graduate students just as I am supportive of Stanford expanding the number of students it educates. The university is an amazing resource and I support efforts to give as many students as possible the opportunity to benefit from it.

I also understand and support Stanford's desire to provide housing for its faculty. Between the need to conduct experiments at all hours, meet with students, teach classes and all the other duties that full-time faculty must perform, living on or close to campus, is for many professors, more than a convenience, it is necessary so that they can fully meet the demands of their careers as researchers, scholars, teachers and mentors.

However, I am not supportive of Stanford, or any other company – be it Facebook, Google or HP, providing housing for all of its employees because I do not support the development of company towns. The adverse impacts and societal problems that arise from these closed communities are well documented in history, economic and law texts.¹ What begins as a benefit becomes a necessity and it is the provider of the necessity that ends up holding all the power. I cannot imagine that Stanford would think that having all employees housed on its land is a benefit. A lack of options for prospective employees – at any pay grade – is a deterrent, not an inducement for employment.

11

At one time, when affordable housing was available in Palo Alto, living on campus was a choice that faculty could make. But, with the high cost of housing in the area which keeps getting driven higher and higher as income inequality continues to grow in this area, it has basically become a necessity for faculty to be provided with some sort of housing guaranty in order to recruit them to Stanford. And, this in turn has created an even greater demand on Stanford's housing. So great that Stanford has had to reduce one time assumed "benefits" of living on campus, such as a widow or widower of a faculty member being able to stay in the family home. One can only wonder at what point of the recruitment process potential faculty are informed that when they die, their surviving spouse (and

¹ I am stating that the adverse effects of a company town are well-documented without citing any articles because there are so many and this comment is not about proving or disproving whether company towns are "good" or "bad." However, a quick search on the internet will yield many sources such as this one – it was the first result when I just did a search. <http://www.pbs.org/tpt/slavery-by-another-name/themes/company-towns/>

children), if not also a Stanford affiliated employee with housing eligibility, must sell and vacate their home within two years.

And, of course, when one loses one's affiliation with Stanford, they lose their housing eligibility and must move. For a professor, that means finding another position at a university which is not likely to be within driving distance so moving to another locale would be required. But, imagine that an administrative assistant loses his or her job. They have not just lost their job, but they have lost their housing as well. Also, tying people's jobs to their employers' lands can be a real deterrent to changing jobs – even to a position that would lead to greater advancement and educational opportunities– because a new job would require moving out of your Stanford affiliated housing and probably moving your children to a different school. Therefore, tying employee's jobs to employers' lands can really limit job mobility.

My opinion on this matter is not just informed by my education in law and land use, but also by personal experience. I grew up in a small town in rural southwestern Pennsylvania, an area of the country known for its coal mines, steel mills and company towns and know full well the detrimental impacts that are created when not only people's income, but also their housing, is provided by their employer.

I have been surprised both at the public meetings and when talking to others that there has been no discussion on the potential downsides of having employers build and provide housing for their employees; the discussions are quite one sided. I find this "solution" to the housing crisis to be a short-term one that is not addressing the larger problems that face everybody in this area which are caused by the lack of affordable housing and accessible and efficient public transportation.

Public transportation does more than move people – it moves conversations, ideas and beliefs from one community to another. It enables a cross-pollination of thoughts and helps remove people from their own echo chambers. It helps to engage members across communities and unite people across causes. Many of the company towns all across the Appalachian mountains had guarded entrances. The companies argued it was for security. Really, it was to keep the unions and new ideas and new people out.

I support the development of affordable housing and public transportation throughout the Bay Area and I greatly support the municipalities working together and with the State to accomplish these

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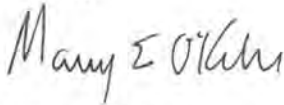
Comment Letter I-O'Kicki

tasks. In the late 1890's, two residents of what is now Professorville had the forethought and initiative to develop and form Palo Alto's city-owned utilities services which has enabled the City to not only keep utility prices at some of the lowest rates in California and maintain the City's infrastructure, but also to be a leader in creating a renewable energy portfolio. These two residents were Stanford professors. We need to all work together to address affordable housing, mass transportation, climate change and the numerous challenges ahead of all of us.

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cont.

Thank you for the opportunity to comment on the Draft EIR.

Sincerely,



Mary E. O'Kicki

Resident, Palo Alto

5.2.3.125 Responses to Comments from Mary O'Kicki

- I-O'Kicki-1 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.
- I-O'Kicki-2 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods
- I-O'Kicki-3 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.
- I-O'Kicki-4 Please see Response to Comment I-O'Kicki-2.
- I-O'Kicki-5 The comment is noted. However, crowding alone is not considered to be an environmental impact under CEQA, and Santa Clara County Department of Planning and Development has chosen to rely on guidance by OPR that increased transit ridership is not an adverse 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.
- I-O'Kicki-6 With respect to the comment supportive of having the Stanford Foothills remain undeveloped and the 4/5ths requirements by the County Board of Supervisors to remain in effect past 2025, this is a policy question for the County Board of Supervisors. Please see Master Response 5: Project Description, Topic 2: Scope of Project and Analysis.
- With respect to the comment supporting maintaining the Stanford Foothills as a conservation and recreation area, the comment is acknowledged, but does not address the adequacy of the Draft EIR.
- I-O'Kicki-7 The comment expresses support for Stanford developing and implementing bird-safe building guidelines for all new building projects.
- Please refer to Response to Comment O-SCAS-2.
- I-O'Kicki-8 This comment concerns the potential impact to monarch butterflies and the potential use of neonicotinoid pesticides on Stanford's campus.
- Monarch butterflies are not a sensitive species as defined by CEQA. At Stanford monarch butterflies are present on a seasonal basis, and can reproduce on Stanford lands (although Stanford's Conservation Biologist has never seen

monarch larvae on Stanford land within the Academic Growth Boundary). The nearest overwintering sites for adult butterflies are in Fremont, and there are more along the coast, from Santa Cruz south to central California. Monarch butterflies have declined significantly over the last few decades. Loss of overwintering sites, decline in the distribution and abundance of their larval host plants and plants providing nectar to the adults, and increased use of pesticides are likely the main causes of the decline.

Monarch butterflies lay their eggs on species of milkweed (genus *Asclepias*). Once the eggs hatch, the resulting larvae eat the milkweed leaves and eventually pupate, typically on the larval host plant (milkweed) or on something nearby which can provide support. After a few weeks (+/- depending on temperature), adult butterflies emerge from the pupae. The adults forage on flowers, and, depending on the time of year, they mate and lay eggs near where they originated from or they can migrate to overwintering sites. The migratory phase and their propensity to form large aggregations for overwintering tends to make them more at risk of extinction than most insects.

Most of Stanford's land within the Academic Growth Boundary does not support large numbers of milkweed. The unbuilt portions of the Stanford campus in the foothills and near Lagunita Reservoir, however, support large patches of milkweed, and Stanford (via the Conservation Program) has recently started tracking the distribution and abundance of milkweed near Lagunita and in conservation areas (foothills and near Matadero and Deer creeks). Milkweed response to some of Stanford's management activities in the conservation areas (mowing and weeding) is also beginning to be investigated. Preliminary results imply that the local milkweed does better when the competing non-native plants are either mowed or hand weeded – both actions which are conducted in the conservation areas.

The distribution and abundance of plants which can provide summer and fall nectar are fairly limited as decades of grazing has eliminated many of the late-flowering species. One of the goals of the Conservation Program, however, has been to re-establish many native plant species, including many which can provide late season resources to insects (and hummingbirds). To meet this goal, the Conservation Program has been planting a wide range of native forbs in the foothills, and recently worked with an undergraduate to seed an area near Lagunita with a variety of native flowers. Stanford has slowly increased the number of native, nectar-producing plants in the conservation areas.

In 2016, Stanford's Grounds department ceased use of neonicotinoid pesticides on Stanford's campus due to concern of impact to insect pollinators.

Monarch butterflies are not a sensitive species, and consequently, implementation of 2018 General Use Permit would not result in a significant

impact to this species. In addition, many of Stanford's management actions (e.g., conservation easements, weeding, planting of native species) conducted for the Conservation Program are directly improving conditions for monarch butterfly.

- I-O'Kicki-9 The Draft EIR Table 5.12-4 on page 5.12-7 shows the estimated number of existing Stanford students, faculty, and staff. Table 5.12-5 on the following page presents the proportion that currently reside on-campus. As can be determined by comparing these tables, a large portion of Stanford's existing population currently lives off-campus.

On June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed on the Stanford campus.

- I-O'Kicki-10 The percentage of the 550 housing units that would be available for faculty, staff, postdoctoral scholars, or medical residents will be determined by Stanford based on priority and need.

- I-O'Kicki-11 A number of personal opinions are expressed in this comment regarding housing, including affordable housing, and transportation. These comments do not specifically address the adequacy of the Draft EIR.

However, as discussed in Response to Comment I-O'Kicki-9, above, the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-Parke

From: [Bonny Parke](#)
To: [Rader, David](#)
Subject: Stanford should help pay to fix the railroad
Date: Wednesday, January 31, 2018 9:00:02 PM

Dear Mr. Radar,

Given the massive projected increase in non-residential square footage (5.7 million square feet) Stanford is envisioning over the next 15 years, I believe that they should contribute to the County's transportation infrastructure, namely with the cost of putting the railroad underground or otherwise dealing with it. We already have one of the highest jobs to residential housing ratios in the country. The resulting long commutes and the traffic are beginning to consume people's lives.

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Bonny Parke, Ph.D.
[REDACTED]
Palo Alto, CA 94306

5.2.3.126 Responses to Comments from Bonny Parke

I-Parke-1 Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.



Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.*

Name:

Richard Patrone

Organization (if any):

SEIU

Address (optional):

City, State, Zip:

E-mail:

[REDACTED]

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

*Affordable housing is a critical issue for
the vast majority of Stanford staff.
Stanford needs to provide affordable
housing for it's staff for environmental,
economic, diversity & justice reasons*

1

(More space on reverse side)

5.2.3.127 Responses to Comments from Richard Patrone

I-Patrone1-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Please also see Master Response 10: Affordable Housing.

Comment Letter I-Patrone2

From: [Richard Patrone](#)
To: [Rader, David](#)
Subject: Lack of Stanford Housing
Date: Tuesday, January 30, 2018 7:45:56 AM

Dear David Rader, Mr.

The vast majority of staff who work at Stanford face the everyday task of a very long and difficult commute (many well more than an hour each way) to their jobs working for Stanford University. This is primarily caused by the incredibly high cost of housing within 40 miles of the University. This causes an environmental and human cost that Stanford can and should solve by creating much more affordable housing on campus. It is a moral, environmental and economic imperative that Stanford include affordable housing for Staff in their GUP proposal.

1

Thank you.

Richard Patrone

Sincerely,

Richard Patrone

[REDACTED]
Woodside, CA 94062

[REDACTED]

5.2.3.128 Responses to Comments from Richard Patrone

I-Patrone2-1 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 the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Please also see Master Response 10: Affordable Housing.



Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **December 4, 2017**.*

Name: Richard Patrone

Organization (if any): SEIU 2007

Address (optional):

City, State, Zip:

E-mail: [REDACTED]

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

Stanford must provide housing for
staff for reasons of environmental impact
& economic justice

1

(More space on reverse side)

5.2.3.129 Responses to Comments from Richard Patrone

I-Patrone3-1 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 the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Please also see Master Response 10: Affordable Housing.

Comment Letter I-Peak1

From: [Tina Peak](#)
To: [Rader, David](#)
Subject: Stanford GUP letter
Date: Tuesday, January 23, 2018 5:35:50 PM

Tina Peak
[REDACTED]
Palo Alto, CA 94301

January 24, 2018

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

Dear Department of Planning and Development,

I would like to request that you deny the Stanford 2018 general use permit.

First I think that it is important to note that Stanford presents itself, but should not be treated, as only a university. In reality it is a massive research and development conglomerate, a huge real-estate investment and management corporation, an enormously oversized hospital and lastly a fairly middle sized university. And apparently they have so much endowment money that they just can't spend it fast enough trying to overdevelop the area around their campus.

1

A quick review of their growth (on campus) over the last 50 years shows that Stanford doubled in size from 4 million to more than 8 million square feet, between 1960 - 1985. In 1989 they requested and received another 2 million square feet of development. In 2000 they received another 4.8 million square feet of development (buildings and housing). And now they are back again asking for another 5 million square feet of development (buildings and housing). They are already over 15 million square feet and it needs to stop!

This time around they are trying to separate out housing from academic and research buildings, but development is development. It all has an impact on pollution levels, numbers of people and the surrounding environment. And it still totals 5 million square feet. Plus they are building on 35 acres in Redwood City, five miles from campus, and plan to have 1.5 million sq. feet there to move some offices off campus and free up even more space on campus.

2

Having been a student at Stanford over 30 years ago I know what the campus used to look and feel like. Today instead of being peaceful and filled with green lawns and open spaces with trees, it is a mass of building after building. All of this might be fine if Stanford existed in a bubble, but it doesn't. Stanford is the largest employer in this

3

Comment Letter I-Peak1

area and their irresponsible, exponential growth has been monumentally degrading to the surrounding community and our quality of life.

They haven't even finished all of the building from the last 5 million square feet of growth granted them with approval of the 2000 GUP. Plus they are building their massive hospital complex that will be close to 2 million square feet, although technically it is not part of the GUP. I believe it is time to take a respite and see how all of the growth affects this area before plunging back into the unending building cycle that has become the norm for Stanford. There should be no more building on campus for at least 10 years to give us a chance to see how all of the building from the 2000 GUP will impact the area.

3
cont.

Stanford's growth already has had negative effects throughout the area. They claim they don't add to traffic, but the reality is that if you look closely at all the exemptions to their traffic plan – they do. Plus if they aren't adding more traffic why are they building so many parking garages? They have excuses like off peak hour traffic and that they have to park the cars for their housing. But the reality is that their development brings more cars to the area.

4

They also drive up demand and therefore cost of local housing. They continue to add more faculty, students and staff than they provide housing for. Further their massive growth will require the local school system to add more classrooms when there is no addition to the tax base. Plus they will require more infrastructure (roads, policing, recreation) that the city will have to provide without any reimbursement.

5

Stanford seems to imagine that it is housed in a large metropolitan area like San Francisco or LA and wants accommodations sized to match. They managed to talk the Palo Alto City Council into approving a medical center that is larger than the one UCLA has in Los Angeles – a city of 4 million people. How much more of the fallout from Stanford's development are we supposed to endure as they try to build their way to a size to fit their imagined importance?

I would like the Santa Clara County Department of Planning and Development to protect Santa Clara County for the future, to ascertain what is the maximum size and population that Stanford seeks? (In fact this would be a good planning exercise for all cities in this area as well as the county). Greed has been driving the growth in this area for the past 20 years and it is time for good citizens and their representatives to tell the developers to stop. We will never return to the verdant farming region that we once were, but it is past time to shut down the urbanization monster that is gridlocking us all. That is not how we want to live. I believe that this area has already surpassed the population that can be ecologically sustained here. I'm referring to a quality of life that includes open space, the ability to travel freely, pollution levels that are not dangerous to health, likelihood that there will be sufficient water supplies and energy to support current residents and the infrastructure to provide these services.

6

The Department of Planning and Development should have a short one word response to Stanford's latest GUP – NO!

Sincerely,

Tina Peak

5.2.3.130 Responses to Comments from Tina Peak

I-Peak1-1 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-Peak1-2 A general comment is made concerning Project development impact on pollution levels, number of people and the surrounding environment. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

Regarding how the Stanford Redwood City campus was considered in the Draft EIR, 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.

I-Peak1-3 Comments regarding Project growth effects on quality of life do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-Peak1-4 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.

I-Peak1-5 The comment raised a number of tax-related issues, which are outside the scope of this Draft EIR. Please see Master Response 1: Non-CEQA Comments.

However, please also see Draft EIR, Section 5.12 Population and Housing, Section 5.13, Public Services, 5.14 Recreation, and Section 5.15 Transportation and Traffic which address all Project and contribution to cumulative impacts to population and housing, public school, parks and recreation, and traffic associated with the construction and operation of the proposed Project.

I-Peak1-6 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comments regarding Project effects on quality of life do 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 5.9 Hydrology and Water Quality, Section 5.14 Recreation, Section 5.15 Transportation and Traffic, and 5.16 Utilities and Service Systems which address all Project and contribution to cumulative impacts to air quality, water quality, parks and open space, traffic and water supply associated with the construction and operation of the proposed Project.

Tina Peak

Palo Alto, CA 94301

January 24, 2018

2018 JAN 29 PM 3:02

COUNTY OF SANTA CLARA

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

Dear Department of Planning and Development,

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First I think that it is important to note that Stanford presents itself, but should not be treated, as only a university. In reality it is a massive research and development conglomerate, a huge real-estate investment and management corporation, an enormously oversized hospital and lastly a fairly middle sized university. And apparently they have so much endowment money that they just can't spend it fast enough trying to overdevelop the area around their campus.

A quick review of their growth (on campus) over the last 50 years shows that Stanford doubled in size from 4 million to more than 8 million square feet, between 1960 - 1985. In 1989 they requested and received another 2 million square feet of development. In 2000 they received another 4.8 million square feet of development (buildings and housing). And now they are back again asking for another 5 million square feet of development (buildings and housing). They are already over 15 million square feet and it needs to stop!

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Having been a student at Stanford over 30 years ago I know what the campus used to look and feel like. Today instead of being peaceful and filled with green lawns and open spaces with trees, it is a mass of building after building. All of this might be fine if Stanford existed in a bubble, but it doesn't. Stanford is the largest employer in this area and their irresponsible, exponential growth has been monumentally degrading to the surrounding community and our quality of life.

They haven't even finished all of the building from the last 5 million square feet of growth granted them with approval of the 2000 GUP. Plus they are building their massive hospital complex that will be close to 2 million square feet, although technically it is not part of the GUP. I believe it is time to take a respite and see how all of the

Comment Letter I-Peak2

growth affects this area before plunging back into the unending building cycle that has become the norm for Stanford. There should be no more building on campus for at least 10 years to give us a chance to see how all of the building from the 2000 GUP will impact the area.

3
cont.

Stanford's growth already has had negative effects throughout the area. They claim they don't add to traffic, but the reality is that if you look closely at all the exemptions to their traffic plan – they do. Plus if they aren't adding more traffic why are they building so many parking garages? They have excuses like off peak hour traffic and that they have to park the cars for their housing. But the reality is that their development brings more cars to the area.

4

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5

Stanford seems to imagine that it is housed in a large metropolitan area like San Francisco or LA and wants accommodations sized to match. They managed to talk the Palo Alto City Council into approving a medical center that is larger than the one UCLA has in Los Angeles – a city of 4 million people. How much more of the fallout from Stanford's development are we supposed to endure as they try to build their way to a size to fit their imagined importance?

I would like the Santa Clara County Department of Planning and Development to protect Santa Clara County for the future, to ascertain what is the maximum size and population that Stanford seeks? (In fact this would be a good planning exercise for all cities in this area as well as the county). Greed has been driving the growth in this area for the past 20 years and it is time for good citizens and their representatives to tell the developers to stop. We will never return to the verdant farming region that we once were, but it is past time to shut down the urbanization monster that is gridlocking us all. That is not how we want to live. I believe that this area has already surpassed the population that can be ecologically sustained here. I'm referring to a quality of life that includes open space, the ability to travel freely, pollution levels that are not dangerous to health, likelihood that there will be sufficient water supplies and energy to support current residents and the infrastructure to provide these services.

6

The Department of Planning and Development should have a short one word response to Stanford's latest GUP – NO!

Sincerely,

Tina Peak



5.2.3.131 Responses to Comments from Tina Peak

- I-Peak2-1 See Response to Comment I-Peak1-1.
- I-Peak2-2 See Response to Comment I-Peak1-2.
- I-Peak2-3 See Response to Comment I-Peak1-3.
- I-Peak2-4 See Response to Comment I-Peak1-4.
- I-Peak2-5 See Response to Comment I-Peak1-5.
- I-Peak2-6 See Response to Comment I-Peak1-6.

Comment Letter I-Perkins

From: [Tim Perkins](#)
To: [Rader, David](#)
Subject: Stanford General Use Permit comments
Date: Thursday, February 1, 2018 9:05:37 AM

Dear Mr. Rader,

I was raised in Palo Alto and lived in the city for twenty one years before returning eleven years ago when I purchased my home on [REDACTED] in the wonderful historic Fairmeadow Eichler neighborhood. I am writing in response to Stanford's proposed General Use Permit (GUP). I do not believe the proposed Stanford GUP adequately addresses its growth, subsequent impacts, and mitigation efforts. While the below bullet points are derived from concerned citizens, I have read and agree with the arguments, and strongly request Stanford's GUP plan be modified to limit this unsustainable growth, which will negatively impact the quality of life of adjacent cities, environs, and residents.

1

Sincerely,

Tim Perkins

[REDACTED]
Palo Alto, CA 94306

-- The impacts on traffic and congestion will be unavoidable if the Stanford GUP is approved without major changes to the plan.

2

-- Stanford is not just adding non-residential space on their campus but on their surrounding properties as well--2.3 million square feet on the campus; 1.3 million square feet on the Stanford Medical Center area; 0.8 million square feet in the Stanford Research Park; and 1.3 million square feet on their new Redwood City Center. This means over the next 15 years increased commuters from a total of 5.7 million square feet on new non-residential square footage.

3

--The area around Stanford--including Palo Alto, Mountain View and Menlo Park--has one of the highest jobs to employed resident ratios of any area in the country and projected growth in the area over the next 20 years, including the new buildings on Stanford properties, will increase new jobs three times faster than new residences.

4

-- All this means more long distance commuting, an increasing amount by rail which is already at capacity.

-- Stanford should commit to pay their fair share of the needed improvements to our rail infrastructure, including grade separations, which are critical to move traffic and reduce congestion in Palo Alto.

5

-- Stanford has set a major goal of keeping all campus commute trips at the level measured in 2001 despite its growth in campus activities. The County is responsible for measuring such activity annually. But the GUP allows Stanford to offset any net new trips to the campus by earning credits through reducing the number of trips in the areas surrounding the

6

Comment Letter I-Perkins

campus (page 5.15-88). If the reductions don't lower the net new trips to zero, Stanford would then have to pay a fee (page 5.15-90). But it is hard to find concrete details on the cost and effectiveness of specific credits. For example, one source of credits is the Stanford Commute Club (GUP Trip Credits: Guideline 3 Commute Club Members). This club pays employees of Stanford Hospital and Clinics and Welch Road buildings (which are off-campus) for utilizing non SOV modes so the University can earn offset credits (page 3). But these employees are already earning credits for such non-SOV travel through the SUMC mitigation with the City of Palo Alto. Are these credits being double-counted? Another source of credits is to park automobiles on Stanford land outside the campus cordon and bus people to campus. This keeps cars from the campus but does not reduce traffic on the highway corridors. Detailed trip credit information and its impacts on surrounding corridors should be readily available for all interested parties.

6
cont.

5.2.3.132 Responses to Comments from Tim Perkins

- I-Perkins-1 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 responses to specific comments made below.
- As discussed in Master Response 1: Non-CEQA Comments, quality of life issues are socioeconomic issues outside the scope of CEQA.
- I-Perkins-2 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.
- I-Perkins-3 The comment summarizes square footage of development that would occur under the proposed 2018 General Use Permit, and other non-Project off-campus Stanford development, and mentions increased commuters associated with that development. This comment does not address the adequacy of the Draft EIR.
- I-Perkins-4 Please see Response to Comment A-PV-3.
- I-Perkins-5 See Response to Comment I-Keehn-4.
- I-Perkins-6 See Response to Comment I-Keehn-5.

Comment Letter I-Peterson

From: [Meg Peterson](#)
To: [Rader, David](#)
Subject: Stanford Growth
Date: Friday, February 2, 2018 2:04:03 PM

Stanford growth it out of control. I live in Stanford Weekend Acres and traffic congestion in that area is already untenable. We cannot sustain more of Stanford University's uncontrolled growth. You must step up to the plate and do something to stop this. Quality of life in our area is seriously being diminished by this out of control building, population, and traffic growth.
Meg Peterson

1

5.2.3.133 Responses to Comments from Meg Peterson

I-Peterson-1 Comments regarding Project effects on quality of life do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

However, regarding the effects on traffic congestion, please also see Draft EIR Section 5.15 Transportation and Traffic that addresses all Project impacts and the Project's contribution to cumulative impacts to traffic associated with the construction and operation of the proposed Project on study area roadways.

Comment Letter I-PhanC

From: [Cheryl Phan](#)
To: [Rader, David](#)
Subject: Stanford 2018 GUP Application and draft EIR: Public Comment from Unincorporated Menlo Park Resident
Date: Friday, February 2, 2018 4:59:25 PM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
[70 West Hedding Street, San Jose, CA 95110](#)
Phone: [\(408\) 299-5779](#)
Email: David.Rader@pln.sccgov.org

February 2, 2018

Dear Mr. Rader,

I am a resident of the University Park neighborhood of unincorporated Menlo Park (San Mateo County). I write in reply to your office's request for public comment regarding Stanford's 2018 GUP Application and draft EIR.

Our Corridor (Alpine Rd/Santa Cruz Ave/Alameda) is already heavily traveled by vehicles with frequent collisions and there is great difficulty for pedestrians including children walking to nearby schools and bus stops to travel safely. This impact significantly worsened when Sand Hill Road was widened in 2004 by Stanford. No effort to mitigate traffic or address safety along our main Corridor was provided and traffic has only worsened since that time.

While the 2018 Stanford GUP pertains to development in Santa Clara County, it should be acknowledged that the impact is regional and residents of San Mateo County, especially those living along the Alpine Rd/Santa Cruz Ave/Alameda Corridor will be significantly impacted.

My concerns include:

1) No New Net Trips. Traffic could significantly worsen for 22 other hours of the day and no mitigation funds would be provided. The significant impact during non-peak hours that is likely needs to be addressed with appropriate mitigation provided. **What is the monitoring system that will be used? A detailed explanation is warranted and more extended monitoring periods of the day to trigger mitigation funds is imperative.**

Hospital visits and employees have been excluded from the Trip Count Data. **These trips should count as should the impact of all other Stanford Hospital and Stanford University development plans.**

If mitigation funds are to be paid, the EIR should guarantee that funds for transportation mitigation is not given exclusively to distant transit hubs, rather funds

should be directed to projects that benefit the affected neighborhoods/geographic area. **How will affected neighborhoods benefit from mitigation funds? Descriptions of methods for mitigation need to be detailed.**

4
cont.

2) Trip Credits. Stanford may be successful in reducing trips through its Trip Credits efforts. However, unless an effort to reduce trips through the Alpine/Santa Cruz/Alameda Corridor is made, I am concerned that West Menlo Park will not benefit. In fact, congestion could worsen yet not trigger any mitigation efforts as currently outlined. **How are credits determined? A more detailed explanation is needed.**

5

3) Vehicle Miles Traveled (VMT). The VMT analysis performed by Stanford is flawed in that it includes undergraduates who traditionally have limited access to vehicles and limited impact to traffic in surrounding jurisdictions. The analysis does not provide a true representation of nearby residents traveling along congested roadways. Moreover, San Mateo County does not have a VMT model at the present time. If reduction in VMT is achieved through developing improved public transportation for commuters that live far away and/or travel via other routes outside of West Menlo Park, significant traffic congestion may still occur within our neighborhood, yet no mitigation would be provided. **How will Stanford ensure that mitigation will be provided to benefit the Alpine/Santa Cruz/Alameda Corridor if congestion significantly increases along these roadways related to the GUP? What process will be used to coordinate the construction of improvements with local jurisdictions and transportation agencies? A detailed explanation is warranted.**

6

4) Cut Through Traffic. A detailed analysis of impacts to neighboring communities needs to be provided. **How will this be done and how will mitigation be addressed?**

7

5) Bicyclists. The EIR should identify West Menlo Park roadways as bicycle routes that currently have inadequate integration of bicycle facilities and determine the needed improvements to facilitate the No Net New Commute Trips standard. This includes an evaluation of Stanford population's use of West Menlo Park roadways and their impact on the need for improvements. There is limited space on the roadway for which bicycling facilities do not currently fit along the entire Corridor. Significant funds and are needed to study how to reconfigure the roadway to provide for this and/or to study alternative bicycle routes within a framework of allowing safe transportation along our Corridor for all modes of users. **How will Stanford engage with San Mateo County and City of Menlo Park to address these needs?**

8

6) Lack of Public Transportation including Marguerite. There are no details about expanded transit services in West Menlo Park where Stanford students, faculty, employees, and affiliates reside. **How will this be addressed to reduce roadway congestion?**

9

7) Construction Impact. Routes need to be designated with input from San Mateo County not just Cities of Palo Alto and Menlo Park. Also, the impact to pedestrian

10

and bicycle safety should be addressed. Construction traffic along Alpine/Santa Cruz/Alameda should be restricted to minimize noise and traffic to residents. **What measures are being taken to ensure that these impacts are being addressed?**

↑
10
cont.

8) Hidden Vehicle Trips. Stanford employees park in our neighborhood and walk/bike to Stanford. **How will Stanford evaluate the extent to which Stanford employees/visitors will park in adjacent neighborhoods to avoid parking fees, creating “hidden” vehicle trips and parking problems within the neighborhood?**

11

Impact on Schools. The DEIR should study the impacts of the 2018 GUP on West Menlo Park schools including La Entrada Middle School and Las Lomitas Elementary School which are one block and directly adjacent respectively to the minor arterial roadway of Alameda de las Pulgas which undoubtedly carries a significant amount of commuter traffic to/from Stanford and for which safety of children getting to/from school due to vehicular traffic has been raised as a significant community concern. Stanford has collaborated with PAUSD to address student safety to/from schools. **How will Stanford work with neighboring jurisdictions to improve student safety along roadways feeding directly onto campus?**

12

Moreover, these schools are community-funded. Stanford provides school impact fees to PAUSD. Many Stanford faculty and employees enroll students, often for a short-term stay only, in the Las Lomitas School District and the MPCSD. **How will Stanford monitor impact to surrounding school districts and provide appropriate impact fees?**

13

HOUSING: The Stanford GUP creates a further imbalance between employment growth and housing availability. I am highly concerned that no process has been created to share mitigation funds with neighboring jurisdictions. These funds should not remain within Santa Clara County alone. There needs to be a guarantee that funds be given to SMC for affordable housing and transportation mitigation and not given to more distant transit hubs, rather than to affected neighborhoods/geographic area. The \$20/sq ft of new campus facilities mitigation fee is too low and not consistent with impact fees paid for other development projects. **What process will be developed to ensure that funds will be shared with neighboring jurisdictions? What requirement will be made to determine an adequate per sq ft mitigation fee?**

14

Enforcement. According to the Stanford Community Plan, there is a Community Resource Group (CRG) that monitors compliance. There is a lack of transparency as to who is in this group and what work has been done.

15

SCP-C 12

Consult with jurisdictions surrounding the campus regarding the potential non-com- mute traffic impacts of new development and activities at Stanford, and work with the jurisdictions to reduce potential effects on neighborhoods surrounding the campus.

SCP-C 13

Identify opportunities to improve access and circulation for pedestrians, transit and bicycles instead of or in addition to system expansions that accommodate automobiles.

Comment Letter I-PhanC

There is no evidence that the CRG has consulted or collaborated with the County of San Mateo. **How will this be addressed in the future?** A transparent, coordinated process for ensuring that the above mandates are met must be developed. 16

In closing, the draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the impact of the proposed GUP will be felt elsewhere and remains to be addressed. 17

Respectfully,

Cheryl Phan
resident of Unincorporated Menlo Park

5.2.3.134 Responses to Comments from Cheryl Phan

I-PhanC-1 This comment is, for the most part, referencing 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. In terms of the extent to which the proposed Project would impact this existing condition, please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for detail on how the Draft EIR addressed potential impacts to neighborhood streets.

I-PhanC-2 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-PhanC-3 Stanford University Medical Center (SUMC) and other Stanford facilities located outside the boundaries of the proposed 2018 General Use Permit are not included in the no net new commute trip count data. Please refer to 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, and Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary.

Please also refer to 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.

I-PhanC-4 Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such

improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.

I-PhanC-5 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion of the trip credit methodology, boundaries, and the fair-share impact fees that would apply if the no net new commuter trips standard is not met.

I-PhanC-6 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 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, their VMT for “non-work” trips are 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.

The VMT analysis concludes that the Project would not result in a significant transportation impact. Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. Please refer to Master Response 13: Transportation and Traffic, Topic 10: Vehicle Miles Traveled for additional detail on the VMT analysis, and Topic 8: Neighborhood Street Impacts for a discussion of how neighborhood streets were assessed for potential impacts due to traffic growth associated with the proposed Project.

I-PhanC-7 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for a discussion of how neighborhood streets were assessed for potential impacts due to cut-through traffic associated with the proposed Project

I-PhanC-8 Please see Chapter 8 of the Draft EIR, commencing on page 8-1, for information regarding the four sets of bicycle facility improvements that Stanford has offered to fund. Stanford proposes to fund four sets of off-site bicycle facility improvements in communities surrounding Stanford, including the cities of East Palo Alto, Palo Alto, and Menlo Park; and unincorporated San Mateo County. These improvements are subject to approval by each jurisdiction in which they are located. The proposed funding for off-site bicycle facility improvements is intended to reduce the potential for local vehicle congestion effects by

encouraging use of alternative modes of transportation. Stanford's funding proposal is independent of achieving the no net new commute trips standard.

If Stanford does not achieve the no net new commute trips standard, Santa Clara County would use trip fees collected by Stanford to fund intersection improvements identified in the Draft EIR. If the use of funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area, which may include additional bicycle facility improvements in neighboring cities.

Please also refer to Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for additional discussion of bicycle infrastructure improvements.

I-PhanC-9 The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to fund expanded transit capacity in West Menlo Park. The Draft EIR explains on page 5.15-155 that the Governor's Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

With respect to the Marguerite shuttles, as a privately operated shuttle, the shuttles can be expanded and contracted to meet the demands on the system at any point in time.

Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for additional discussion of how increased transit use is evaluated in the Draft EIR.

I-PhanC-10 The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual 2018 General Use Permit projects.

The 2018 General Use Permit EIR is a program-level evaluation, and does not specifically consider individual projects. As such, construction impacts are addressed at a programmatic level. Project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at the time they

are proposed to determine whether the environmental effects of the specific project were adequately disclosed in the 2018 General Use Permit Program EIR. Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

- I-PhanC-11 Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of Stanford affiliates parking off-campus.
- I-PhanC-12 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. Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.
- Also, as discussed in the Draft EIR, Chapter 8, Special Considerations, Stanford proposes to contribute funding towards off-site bicycle improvements, including along Alameda de Las Pulgas/Santa Cruz Avenue west of Sand Hill Road, which would increase connectivity and safety along these roadways for bicyclists.
- I-PhanC-13 As discussed in Draft EIR, Section 5.13 Public Services, the Project site is located within the Palo Alto Unified School District (PAUSD) service area. The PAUSD collects school impact fees on new residential and commercial development within the PAUSD's boundaries, including that developed by Stanford. Neighboring school districts similarly collect school impacts fees from new residential and commercial development that occurs within their own service areas.
- I-PhanC-14 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. Please also see pages 5.15-88 through 5.15-90 of the Draft EIR and Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation, for a discussion of how transportation mitigation measures would be paid for and administered.
- I-PhanC-15 The Stanford Community Resource Group (CRG) members are selected by the County Planning Office in consultation with the County Supervisor for the Fifth Supervisorial District. As a general guideline, the role of the Community Resource Group is to provide a mechanism for exchange of information and perspectives on Stanford development issues. The CRG is not an advisory or approving body.³⁷

³⁷ Additional information on the Stanford CRG, including CRG administrative policies and terms of service, meeting calendar and other information is located on the Santa Clara County website here: <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/StanfordCRG.aspx>.

- I-PhanC-16 The County Board of Supervisors will consider the composition of CRG at the time of approval and conditioning of the 2018 General Use Permit
- I-PhanC-17 The comment consists of opinions, and a general statement about impacts of the Project in San Mateo County. Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics.

Comment Letter I-PhanS

From: [Samson Phan](#)
To: [Rader, David](#)
Subject: Stop Stanford"s endless expansion
Date: Thursday, February 1, 2018 8:12:25 PM

Dear Mr. Rader,

I'm a proud Stanford Alum, but I worry that there is no thought to maximum build-out. We as a community give Stanford a lot of leeway, and they have protected the hills for the public to use. It was mentioned that this latest round of construction, one that will develop pristine land. No assurances of open space protection should mean no deal on this expansion. Rather, have Stanford consider infilling. There are many areas on campus that are underutilized.

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Samson Phan

5.2.3.135 Responses to Comments from Samson Phan

I-PhanS-1 With respect to a maximum buildout for Stanford, please refer to 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.

No changes to the existing Academic Growth Boundary (AGB) location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.

Please also see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comment Letter I-Porter

From: [Karen Porter](#)
To: [Rader, David](#)
Subject: Comments on Stanford Draft EIR
Date: Friday, February 2, 2018 11:59:18 PM
Attachments: [image.png](#)

Dear Mr. Rader, I have serious reservations about the nature and scope of Stanford's development proposal but in the interest of time will limit my comments to the increased demand on Palo Alto's wastewater and collection infrastructure. The below excerpt indicates that this presents a potentially significant impact:

The scope of this EIR includes environmental issues that have the potential to be significant impacts, as determined through preparation of the NOP, responses to the NOP, scoping meeting, and discussions among the public, consulting staff, other agencies, and the County of Santa Clara. This process identified potentially significant impacts associated with the construction and/or operation of the proposed Project in the following issue areas:

- Visual and Scenic Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy Conservation
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise and Vibration
- Population and Housing
- Public Services (Police Protection, Fire Protection and Emergency Services, and Public Schools)
- Recreation
- Transportation and Traffic
- Utilities and Service Systems (Water Supply, [Wastewater](#) Collection and Treatment, and Solid Waste Disposal)

However, I was not able to find any discussion regarding what Stanford was proposing to do about this. As you may know, the City is constructing a new sludge facility in the Baylands -- what is Stanford contributing? And this is just an interim solution; the best and most environmentally sound would be construction of an anaerobic facility, but I believe the City is delaying this due to cost. I strongly believe Stanford should provide the necessary assistance so Palo Alto does not have to bear a disproportionate amount of these costs.

Thank you,
Karen Porter
Palo Alto

5.2.3.136 Responses to Comments from Karen Porter

I-Porter-1 Please see Draft EIR Section 5.16 Utilities and Service Systems which addresses all Project and contribution to cumulative impacts to the public wastewater collection and treatment system from the Project. The anaerobic-digestion plant proposed by the City in the Baylands that the comment refers to is still in the planning stage. Stanford and other partners of the Regional Water Quality Control Plant would reimburse the city for their fair-share for the cost this facility.

Comment Letter I-Pyszka

From: [Gloria Pyszka](#)
To: [Rader, David](#)
Subject: SCC: Have some backbone when dealing with Stanford
Date: Thursday, December 21, 2017 12:20:37 PM

This whole subject about Stanford's march to greatness through uncontrolled growth is abominable. Have some balls, people. Do not let them run all over you.

Just sign me "a sweet little old lady who is a 1962 grad of SU as well as a SU retiree and a long-time resident of Palo Alto." I've see them "at it" for years.

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Gloria Pyszka

[REDACTED]

Palo Alto

5.2.3.137 Responses to Comments from Gloria Pyszka

I-Pyszka-1 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.



Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.*

Name:

Johannes Raatz

Organization (if any):

SEIU 2007

Address (optional):

City, State, Zip:

Stanford, CA

E-mail:

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

Members of SEIU, workers who help allow Stanford function - without us, the university would shutter - are a central component of both the Stanford and Palo Alto/Santa Clara County communities. As such, Stanford is accountable to workers' needs. Priority number one is housing. A crisis already exists, therefore the GOP must provide a significant number of new units for service workers. →

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(More space on reverse side)



The few million dollars Stanford provides to
Palo Alto and for affordable housing is negligible.
The University must - and can - be held
to a higher standard.

↑
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cont.

Thank you,
John Raatz

Send comments to:

David Rader, Senior Planner
County Government Center, East Wing, 7th Floor
70 W. Hedding Street, San Jose 95110
david.rader@pln.sccgov.org

5.2.3.138 Responses to Comments from Johannes Raatz

I-Raatz1-1 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Please also see Master Response 10: Affordable Housing.

Comment Letter I-Raatz2

From: [Johannes Raatz](#)
To: [Rader, David](#)
Subject: Please Hold Stanford to a Higher Standard
Date: Monday, January 29, 2018 4:10:37 PM

Dear David Rader, Mr.

Stanford is a remarkable institution, if even only for its vast wealth. Unfortunately, support of community - both the University campus community - and the surrounding areas and the county, has not been a priority.

As housing and transportation crises deepen, we see this as a watershed opportunity for the County to hold Stanford to a higher standard. Stanford should (and can) provide much more resources to the community by providing housing to its workers and giving much much more to the county's affordable housing fund.

If the institution's properties were taxed, the cost to Stanford would be many times more than what they contribute in reality. It's time to close that gap.

Stanford might not see its priority as contributing to the surrounding community, but it is ours. Raising the standard from the status quo will also be good for Stanford. When workers no longer have to commute daily from as far away as Tracy, Stockton, and even Sacramento - they will be happier, healthier, and more productive. When vehicle miles drop, and smog is reduced, the whole campus will benefit. When Stanford starts acknowledging community in a broader sense, we will all benefit.

Please hold Stanford accountable to the contributions it should be making for housing, transportation, etc.

Thank you,
Johannes Raatz
SEIU 2007

Sincerely,

Johannes Raatz

[REDACTED]
San Jose, CA 95112

[REDACTED]

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5.2.3.139 Responses to Comments from Johannes Raatz

I-Raatz2-1 Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

Please also note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-RichardsonG

From: [Greg Richardson](#)
To: [Rader, David](#)
Subject: Alpine Road Work
Date: Wednesday, November 22, 2017 12:06:44 PM

David,

We're residents in the Stanford Weekend Acres neighborhood and are highly supportive of Stanford's proposed improvements to the trail and the road. Unlike our neighbors who are concerned about disruption, we want improvements to the long term infrastructure of the road and the trail.

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Thanks,

Greg Richardson
41 Sneckner Court
Menlo Park, CA

5.2.3.140 Responses to Comments from Greg Richardson

I-RichardsonG-1 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-RichardsonS

From: [Susie Richardson](#)
To: [Rader, David](#)
Cc: [joe simitian](#)
Subject: Stanford plan
Date: Thursday, February 1, 2018 8:20:35 PM

I am very concerned about Stanford's planned growth. Although I think a permanent cap on development is very desirable, I would highly recommend limiting development to housing for the next 5 years and having a moratorium on academic development until the effects of the most recent development including two huge hospital expansions can be determined. We need to determine if efforts to reduce car trips are successful BEFORE we permit further growth.

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I am concerned that we are very close to gridlock for increasing hours of each the day.

-We don't know the effect of the huge hospital expansion on traffic

-We don't know the effect of approved expansion in Menlo Park.

-We don't understand the possible increase in car trips between the campus and built or planned expansion in other communities (ie. the new medical buildings in Redwood City).

-We don't know the effect of increase in the number of students and employees.

I am concerned Stanford's numbers are misleading. For example, a reduction in the percentage of people traveling solo that Stanford is touting doesn't illuminate the total increase in the number of car trips due to the increase in the number of employees.

I am concerned that we don't understand the number of people accommodated on a per square foot average basis as compared to past usage.

I am concerned that there needs to be more cooperation between the University and the School District to provide needed facilities and funding.

I commend Stanford for its plans to build housing, but don't think that housing should be viewed as a trading chit. We need to ground our decisions in the reality of sustainability and quality of life for the entire community.

Thank you.
Susie Richardson
[REDACTED]
Palo Alto 94301
[REDACTED]

5.2.3.141 Responses to Comments from Susie Richardson

I-RichardsonS-1 The comments requesting permanent cap on development and limiting development to housing for the next five years do not address the adequacy of the Draft EIR.

Regarding the hospital expansion, see below.

I-RichardsonS-2 to I-RichardsonS-3

With respect to how the Draft EIR treats non-Project, off-site development projects in either the baseline or cumulative context, please 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.

I-RichardsonS-4 The environmental impacts associated with the increase in Stanford population, including students and employees, are fully addressed in the Draft EIR.

I-RichardsonS-5 Please refer to 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 in the future.

I-RichardsonS-6 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-RichardsonS-7 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-RichardsonS-8 The comment does not address the adequacy of the Draft EIR, please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Robinson

From: [Pat Robinson](#)
To: [Rader, David](#)
Subject: Stanford Environmental Impact Map
Date: Tuesday, October 10, 2017 1:18:10 PM

Dear David,

I have lived on the corner of [REDACTED] St. for Over 50 years. When I looked at the map that came today I wondered if the map maker realized that the land across the street from California Ave is Stanford land, although not marked as such.

College Terrace is the spit of land between Stanford Ave. and California Ave. This area is part of Palo Alto history. There are many people who believe that Stanford is buying up the housing as it becomes available. I doubt that this concern is valued, but the commission should keep it on their radar if it, indeed, is valued.

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Cheers! and thanks for inviting our comments.

Sincerely, Pat Robinson

[REDACTED]
Palo Alto, California

5.2.3.142 Responses to Comments from Pat Robinson

I-Robinson-1 The comment does not address the adequacy of the Draft EIR, please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Rocha

From: [Frank Rocha](#)
To: [Rader, David](#)
Subject: Affordable housing or decent living wage
Date: Tuesday, January 30, 2018 7:56:31 AM

Dear David Rader, Mr.

Having worked at Lockheed Martin for 30 years which were primarily in management, I am generally pro management but in this situation at Stanford, I strongly side with the front line workers who are pushed beyond our limits. I have suffered a hernia and rotator cuff surgery repair due to unsafe work conditions and excessive work loads. Stanford preaches their mission is to make the world a better place. They need to step up to the plate and lead the efforts in social justice. Stanford's vast land holdings and income could easily double our wages or develop low cost housing for us poverty classified employees. As San Jose is making Google accountable for exceduse of affordable housing so should Palo Alto hold Stanford accountable. Thank you for hearing my concerns.

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Sincerely,

Frank Rocha

[REDACTED]

San Jose, CA 95117

[REDACTED]

5.2.3.143 Responses to Comments from Frank Rocha

- I-Rocha-1 The comment does not address the adequacy of the Draft EIR, please see Master Response 1: Non-CEQA Comments.
- I-Rocha-2 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 on campus.

City of East Palo Alto City Council Meeting of 11/9/2017.

<https://vimeo.com/242616308>

Councilmember Romero: Yeah, I will actually get comments into the record.

So, let's start with your jobs-housing linkage fee, which I'll call it a commercial linkage fee. That's probably what it is really. I think it's \$20; is that right? What you're at? So, Mountain View has a commercial linkage fee that's closer to \$25, \$26. Why wouldn't Stanford be at that same amount? Our linkage fees here are anywhere from \$18 to \$24, \$25, I think. I think Stanford, in this case, is probably low balling it and unless this is set by ordinance through the County, I think that Stanford should just step up and say, yes, we will be as large a contributor on trying to mitigate the affordable housing impacts of our project by moving from \$20 to \$25 because, certainly, other cities are doing it, and, certainly your endowment, which is significantly large enough, could probably afford a few more million dollars into this fund. So, I would certainly urge you to consider that.

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In terms of a redefinition of where those funds could be spent, now, it sounds like it's a County fund which would mean that you couldn't do the cross-county subsidization. If you can, that would be great, but, if-- I am concerned if you redefine the 6-mile radius, which you were using previously, to a half-mile around a transit corridor, that if your definition of a transit corridor has to be a certain number of passengers being carried per day on public transit, then we may, indeed, be left out because we are on the tail end of bus service in San Mateo County so that we probably would not be getting as high a number as if we, let's say, were on El Camino Real or on Hillsdale or something like that. So, clearly, that would be an important consideration when redefining what a transit corridor is, or, possibly, you may want to go back to the 6-mile radius.

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I will commend you all for the work you've done on travel demand management. I think it gets mentioned in many places including nationally when I go around and talk about urban planning, urban design issues, and, certainly, I think your campus probably has a very high utilization of bikes because you happen to have a lot of class one trails. As a matter of fact, amazing that you have class one trails right alongside of El Camino Real. To the extent that you may be able to create some sort of fund that would allow neighboring cities to indeed develop class one trails that lead to the University, we could indeed increase the number of folks who

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utilize bikes going to the University. As you probably know, we, certainly in East Palo Alto, have a number of low income folks, some of whom I work with in various walks of my life, who do work as contract employees to the University, and some of them ride bikes, and some of them actually take public transit, and some of them actually have to drive. Again, to the extent we can have those multi moto connections fully developed between neighboring cities that provide a lot of your service sector workers, I think it would be beneficial to us all.

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cont.

I am a little concerned about the way you all are analyzing traffic impacts. You know, we go through this all the time. You tend to be focusing on peak hours, and we understand you want to control peak hours, but we wind up being affected by any traffic that cuts through our city, whether it's through Willow, which is congenital, but never-the-less we use it, or University. And, so again, that analysis is solely focusing on controlling those peak hour numbers, I think is of concern to me and I would certainly like to understand better through the EIR what those off-peak hours are like and what the impact is to this community.

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So, I'll also commend you and, then at the same time, dis you. Commend you on the fact that you are building housing. You built housing under the last GUP. You're continuing to build housing under this propose GUP. I would say that you need to build more housing, but I would also say that you need to, and it's my understanding that you are not building affordable housing for your non-academic, non-student, constituents, or whatever you want to call them, and I think it is vitally important that you're—whether it's your janitors, whether it's members of SEIU who certainly wind up cleaning your—who end up doing the gardening work for you guys, or doing the maintenance work, many of them do live in this community. Others live across the bay. Others double and triple up in houses. And, so to the extent that you can provide some of that housing on campus, which up to this point is my understanding that you will not be, I think it's the socially just thing to do and probably from an urban planning perspective a smart thing to do so indeed you can cut down on those trips.

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I don't quite understand exactly-- So you have a-- I think you have a remaining, now, I'm quoting from our staff report, Utilization of the remaining-- one of the things that you, utilization of the parking rise GUP 1480 spaces, and, then, I guess you're banking, or you're proposing another 2,000 net new parking spaces under this GUP. Isn't that counter productive, or, actually it's counter intuitive, actually to be doing this if what you're trying to do is not have any net new trips, so could someone explain why the additional parking, in this case, almost 3,500 additional parking spaces.

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STANFORD: So, in 2000 we were authorized to build 2300 parking spaces, and kink of to date, we have not built any of them. We've replaced. We've taken aware service parking and built underground, but we are essentially where we were in 2000. We're adding two new structures as we speak are that are being proposed. One is about 750 spaces for the new EV graduate residences. Both the parking structures essentially restore for the cars of the residents. Not really associated with peak hour trips. And, then, we have-- We're finally have a need for some of our academic spaces, so those are being proposed for the west side of the campus. So, of our 2300 allocation originally, we think there should be about 1400 left over when we're done with this department. So, we're saying we will live with the authorization that we were granted in 2000 which would allow another 1400 spaces. And a lot of our spaces aren't necessarily (inaudible). Like I said, we have student housing as the students bring their cars in (inaudible). So, what we said is, if you look at what we've proposed, I'm sorry. Is that me. So, if you take the academic square feet that we've proposed, and the housing units and you say, look at the parking usage today. If you projected that out, that would be 3500 spaces. So, we're saying we hope to keep that down to 1400, but if something happens and we find out that we need to ask the Planning Commission for the ability to build part of that 2000, then we would have that disclose that at the beginning. There are certain conditions that have to be met. For example, if something happened to Caltrain and all of the sudden it was inoperable for 6 months, and we needed to get our people to campus, we could ask permission to build some of those units, or if we find out we're still maintaining our peak hour congestion, but we've got a lot more visitors, and so we're going to ask to build that. It's not an automatic, but we have the ability to request it.

Councilmember Romero: So, that's where the 2000 comes from. I would-- this I would say to the County, certainly if those 2000 parking spaces are needed in the future, shouldn't there be some sort of compensatory cost that the University would pay, even though they have the right to build up to those 2000, there would be some cost associated with bringing those on that might go to a bike fund, go to some other mitigation fund so that it would be a disincentive for the University to actually use those. Although, I'm sure if you charged a \$1,000 a parking spot, the University would still build it, if it had to, because it would certainly come up with the money. But, thank you for clarifying the parking piece.

You know, as someone who actually uses the facilities, you know, the libraries of law. You know, I teach at Berkley, and there is (inaudible) I actually get to use those libraries, and as someone who bikes there I'd say at least a couple of times a

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week, I mean, it's pretty clear, that your parking facilities seem to be, at least those that I'm going through biking, seem to be utilized fairly significantly so I am concerned that adding the other, what is it 2.6 square feet of academic square feet; is that right? 2.275 is indeed going to increase that use. And, I'll also say in terms of students, and Stanford student bike a whole lot more than Berkley students because Berkley students are up on a hill, but in terms of student cars, I would hope that the University would aggressively go after car share whether that means zip car, your own student run co-op, it would be a wonderful way to reduce and subsidize a form of zip car even where your ASB fees might even go to subsidize that. You could certainly significantly reduce the number of cars that folks might bring on the campus, not to mention, I don't suppose parents would like this, but you could actually have a fee if you actually bring your car onto the campus because clearly there was an environmental impact.

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cont.

I think I will stop there and if I have anything else to add, I guess I can always write it. Thank you very much.

5.2.3.144 Responses to Comments from Carlos Romero

- I-Romero-1 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.
- I-Romero-2 Please see Master Response 10: Affordable Housing, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.
- I-Romero-3 Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.
- I-Romero-4 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).
- Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.
- I-Romero-5 Please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

I-Romero-6 The comment regarding parking is noted, but does not address the adequacy of the Draft EIR. Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of how additional parking supply would still allow Stanford to meet the no net new commuter trip standard, and the strict conditions for which parking would be expanded beyond the limit approved in the 2000 General Use Permit.

I-Romero-7 As stated in Chapter 3, Introduction, the EIR has been prepared in compliance with CEQA (California Public Resources Code (PRC), Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15000 et seq.). The EIR properly discloses the physical environmental effects of the proposed project, and identifies mitigation to reduce or avoid its potentially significant impacts to the extent feasible.

It should be noted that parking supply is not considered to be part of the physical environment as defined by CEQA, and parking deficits are considered to be social effects. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Consequently, no mitigation is required for these effects.

Comment Letter I-RosenthalA

From: [Anne Rosenthal](#)
To: [Rader, David](#)
Cc: [Loquist, Kristina](#)
Subject: Stanford Draft EIR
Date: Sunday, December 3, 2017 10:46:16 PM

Comments on the Significant Environmental Effects of the Stanford University 2018 General Use Permit

1. Construction as described in the Stanford project would be extensive and would require a large temporary workforce. With housing in short supply, especially on a temporary basis, a number of construction workers involved with Stanford and Palo Alto projects have been living in RVs parked along El Camino and elsewhere in Palo Alto.

1

I recommend that Stanford consider temporarily allocating land for use of construction-related RV parking or otherwise provide temporary housing for the extensive construction workforce that will be required.

2. Similarly, many patients requiring medical treatment over a period of time – for example, radiation treatment for cancer – are unable to find temporary affordable housing in the area for themselves and / or family. Area hotels have become very expensive for families of hospital patients. I recommend that Stanford consider integrating temporary housing for patients and their families into the hospital / medical complex, in order to keep their regional cancer and medical center accessible to patients from outside the immediate area. Some of the out-of-town patients are also using RVs and need RV parking.

2

Anne M. Rosenthal

5.2.3.145 Responses to Comments from Anne Rosenthal

- I-RosenthalA-1 As shown in Table 5.12-8 on page 5.12-13 of the Draft EIR, the number of construction workers on the campus is expected to remain unchanged during the 2018 General Use Permit period. The number of construction workers is expected to stay constant in keeping with the trend exhibited during the 2000 General Use Permit, and construction is expected to continue at historic rates under the 2018 General Use Permit. Stanford does not currently provide temporary construction worker housing or RV parking and does not propose to include such housing as part of the 2018 General Use Permit.
- I-RosenthalA-2 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-RosenthalB

From: [Beth Bondel](#)
To: [Rader, David](#)
Subject: Re: Stanford GUP
Date: Wednesday, January 31, 2018 2:19:00 PM

> On Jan 31, 2018, at 11:44 AM, Beth Bondel <bondel585@gmail.com> wrote:

>

>

>> On Jan 30, 2018, at 7:25 PM, Dr. Beth Rosenthal <bondel585@gmail.com> wrote:

>>

>> Dear Mr. Rader:

>>

>> I am writing to share with you my concerns about the Stanford GUP as it currently stands. I am a 45+ year resident of Palo Alto. I live on a narrow street that accesses the University Ave. entrance to 101. Because of increased traffic, it can take 20 minutes to traverse the one block to get to the freeway. This is the current state of affairs even before the proposed Stanford expansion.

>>

>> I ask that Stanford take into account the community in which it resides as it considers what it wishes to do in terms of expansion. To this effect, Stanford should find a way to insure that its expansion plans do not make traffic in the surrounding communities worse. Encouragement and facilitation of rail travel for employees would help traffic congestion. In this regard, Stanford should commit to paying its fair share of improvements to rail infrastructure including funding for grade separations. Employee housing should be located on campus, not in surrounding communities. The increase in the number of employees means that additional students will be added to schools that are already operating at capacity. PAUSD has asked that Stanford include as part of its expansion plan the construction of an elementary school on the campus to address the educational needs of employee children. It has also requested that employee homes in surrounding communities do not receive property tax exemptions. Tax exempt status reduces the operating budget for local schools who depend on property tax revenue to fund their programs.

>

> In deciding how to respond to the Stanford GUP, I hope the Supervisors will consider the impact on the surrounding communities as well as the wishes of the University.

>

> Sincerely,

>

> Beth Rosenthal, PhD

>

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3

5.2.3.146 Responses to Comments from Beth Rosenthal

- I-RosenthalB-1 Existing traffic conditions at the University Avenue entrance to Highway 101 are noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

- I-RosenthalB-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.

Please see also Master Response 12: Public Schools, Topic 2: Additional School Site.

- I-RosenthalB-3 The comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-RosenthalP

From: [peter.rosenthal](#)
To: [Rader, David](#)
Cc: [Supervisor Simitian](#)
Subject: Stanford GUP and Environmental Impact Report
Date: Monday, January 29, 2018 9:25:54 PM

Dear Mr. Rader:

As a 45 year resident of Palo Alto and former research scientist at Stanford, I would like to offer my comments on Stanford's GUP.

I believe we are all aware of the current problems with traffic congestion, parking and quality of life in the communities surrounding Stanford. We are all beneficiaries of many wonderful things that Stanford has brought to our community in the way of cultural opportunities, a vibrant intellectual environment and a highly evolved and and productive economic milieu.

These contributions do not mitigate the potential damage that Stanford's continued expansion is likely to do to our community. In this vein, I would like to urge you to push back on the current GUP so that we do not permit unrestrained growth while accepting unproven, and potentially unvetted promises of traffic control, congestion mitigation and unresponsiveness to the broader community impacts of the proposed expansion.

Specifically, I would like you to require that Stanford fund a significant and proportionate share of the cost of impacts on our community that their proposal will impose, including funding for caltrain capacity improvement, grade separation expenses, public school expansion needs, fire and police force enhancement and improvements to feeder routes around and to the campus.

There has also been considerable concern that the metrics used to measure increased vehicle utilization and various mitigation methods are inadequate and unscientific with regard to true measures on the impact this GUP will have on our communities.

Sincerely,

Peter N. Rosenthal, Ph.D.
Crescent Park
Palo Alto, CA

5.2.3.147 Responses to Comments from Peter Rosenthal

I-RosenthalP-1 General comments are made about existing traffic congestion, parking and quality of life; and continued expansion effects on traffic control, congestion mitigation and community impacts. Due to lack of specificity in these comments, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

I-RosenthalP-2 The Draft EIR Section 5.13 Public Services, Section 5.15 Transportation and Traffic addresses all Project and contribution to cumulative public school, fire police protection, and traffic impacts associated with the construction and operation of the proposed Project, and identifies mitigation that reduces significant impacts to the extent feasible.

The methodology measuring achievement of the no net new commute trips standard, including the annual cordon counts is explained in the County's annual traffic monitoring report and was developed by the County and its consultants in 2001.³⁸⁻³⁹ The methods for measuring the effectiveness of Stanford's off-campus trip reduction programs is described in the trip credit guidelines approved by the County Planning Office in consultation with the Community Resource Group.⁴⁰ Mitigation Measure 5.15-2, as presented in the Draft EIR, expands on the 2001 no net new commute trips monitoring methodology that was formulated in the 2000 General Use Permit EIR, in that it incorporates the ability to upgrade for technology advances and allows the County to collect fair-share impact fees in the event that the standard is not met that would be used for intersection improvements outlined in the Draft EIR, or if funding of such improvements is infeasible, for other trip reduction programs in the local impact area. 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.

³⁸ See <https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Archive.aspx>.

³⁹ See https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU_2018_Traffic.pdf.

⁴⁰ Stanford Traffic Cordon Count Credit Guidelines, October 2015.

We live in Redwood City, and what Stanford is doing here is unbelievable!

They only care about themselves - (and their athletes.).

Why don't they offer to share mental health care for children instead of studying deceased criminal brains? What good will that do for current and future children?

Please, please don't encourage their egotistical behavior, and growth plans.

Thank you

5.2.3.148 Responses to Comments from Unnamed

I-RWCResident-1 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Saadati

From: [Sheriene Saadati](#)
To: [Rader, David](#)
Cc: [mcallagy@smcgov.org](#); [city.council@menlopark.org](#); [dshu@smcgov.org](#); [bwood@almanacnews.com](#); [Dave Price](#); [plngbldg@smcgov.org](#)
Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Saturday, November 25, 2017 8:46:06 PM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
70 West Hedding Street, San Jose, CA 95110
Phone: (408) 299-5779

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

1

The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2

2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

3

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

4

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

5

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

6

Comment Letter I-Saadati

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

7

Sincerely,
Sheriene Saadati
San Mateo County Resident

5.2.3.149 Responses to Comments from Sheriene Saadati

- I-Saadati-1 Please see Response to Comment I-Appel-1.
- I-Saadati-2 Please see Response to Comment I-Appel-2.
- I-Saadati-3 Please see Response to Comment I-Appel-3.
- I-Saadati-4 Please see Response to Comment I-Appel-4.
- I-Saadati-5 Please see Response to Comment I-Appel-5.
- I-Saadati-6 Please see Response to Comment I-Appel-6.
- I-Saadati-7 Please see Response to Comment I-Appel-7.

Comment Letter I-Schiano

From: Diane Schiano
To: Rader, David
Subject: Fwd: Delivery Status Notification (Failure)
Date: Monday, January 29, 2018 6:56:25 PM
Attachments: icon.png

Forwarded conversation

Subject: **Objections to Stanford's GUP; implications for SWA and Alpine Road x Piers Lane traffic, congestion, parking**

From: Diane Schiano [REDACTED]
Date: Tue, Jan 23, 2018 at 11:18 AM
To: Michael Callagy <mcallagy@smcgov.org>, Don Horsley <dhorsley@smcgov.org>, Steve Monowitz <smonowitz@smcgov.org>, Diana Shu <dshu@smcgov.org>, Joe Lo Coco <jlococo@smcgov.org>, Warren Slocum <wslocum@smcgov.org>, Raymond Mueller <rdmueller@menlopark.org>, Kirsten Keith <kkeith@menlopark.org>, "potahki@menlopark.org" <potahki@menlopark.org>, Catherine Carlton <cat.carlton@me.com>, "R. CLINE" <rcline@menlopark.org>, supervisor.simitian@bos.sccgov.org, city.council@cityofpalto.org

Hello,

I am writing for myself, my husband, Rick Voreck, and my son, Christopher Voreck (age 19). We live at [REDACTED], which is located directly at the [REDACTED] intersection in unincorporated San Mateo County. We are part of the neighborhood known as Stanford Weekend Acres. We experience intense traffic congestion and speeding problems (depending on the time of day and day of week) every day, just trying to get out of our driveway. The "informal parking" of so many cars right above our property (as part of an easement, in fact) so that people can walk in the Stanford Open Space magnifies the problem, adding congestion and chaos. There are times when a left turn--and sometimes even a right turn--from Piers onto Alpine will take 10 minutes!

We have read summaries and reviews of the proposed Stanford GUP and are extremely concerned about its impact on us, on our neighborhood, and on other neighborhoods in the area surrounding Stanford.

We are discouraged by Stanford's inclusion of **2.275 million square of feet of academic and academic support space and 3,150 housing units, translating to a population expansion of over 9,600 people in this area.**

The traffic situation on Alpine Road after 280 and up to Junipero Serra is already nearly untenable, and this will only make it worse. We have complained and asked for mitigations in various ways and to various agencies...when we were notified (which has not always been the case). Our concern is especially great after Stanford's previous GUP, which was supposed to have no net increase in traffic. BULLSHIT! And the misleading way in which mitigation clauses were interpreted so as to push for expansion of public roads near the Stanford Open Space--in San Mateo as well as Santa Clara counties--rather than the "paths" in the Open Space, which was clearly the intent. BULLSHIT ON TOP OF BULLSHIT!

More generally, we agree with Peter Dreke that **Stanford should be required to specify a maximum build-out, which should be debated by the public.**

We agree with the Objections to the GUP that have been presented by many before us, including, most notably, Janet Davis, also of Stanford Weekend Acres. I've pasted some of her messages, including a very compelling video of what goes on at our intersection regularly, below. I've also attached some photos I've taken, but unfortunately, the congestion that makes turning so difficult is hard to photograph, especially now that "Keep Open" notices have been painted on the street. (These are somewhat helpful, but not enough). But the fact that cars are stacked up onto 280 at our exit, which is common knowledge, should be compelling enough.

The untenable parking and congestion problems we experience are directly due to Stanford. Parking should not be permitted, or should be highly regulated, at this intersection. We'd love to have a stop light or stop sign, and have requested this many times. Anything else that could be done to mitigate these problems would be appreciated.

...

Janet Davis [REDACTED]

Re: Alpine Road problems by Piers Lane

Jan 18 (5 days ago)

.

to Diana, Michael, Don, Rick, me, Dave, John, Christina, Jim, Rebecca, Robert, Susie



Gunter took some pictures of the problems caused by parking for the Dish back entrance last weekend (Piers and Ansel Lanes). My observation has been that this happens in the early mornings and is especially bad when the weather is good. What you do not see in his pictures (see below) are all the cars parked on Ansel Lane, the occupants of which also race across the road. Note all the cyclists that have to venture out into the vehicle lanes and the (one of many) cars doing a U-turn from the Dish to head back towards I-280. I think that it would be safer if there were to be NO PARKING zone along the Webb Ranch side of Alpine, and (if possible) some means to prevent U-turns across traffic from Piers Lane. Diana Shu suggested that I ask Stanford to initiate a NO PARKING request which I will do. It would be helpful to get input from cyclists since this problem is just before the I-280 on and off ramps where a cyclist was killed a couple of years ago, and where the traffic headed towards Menlo Park is often going at freeway speed - despite the 35 mph limit! It would also be helpful if the CHP and Sheriff could focus on this area periodically.

[Produce1.mp4](#)

Comment Letter I-Schiano

Produce1.mp4

MP4 File

>>>>>>>>

Janet Davis

Jan 13 (10 days ago)

to David, Don, Michael, Warren, Christina, Diana, Peter, Kirsten, Raymond, Catherine, CLINE, Jim, supervisor.sim.



STANFORD UNIVERSITY GUP FURTHER OBJECTION TO TRAFFIC IMPACT ON ALPINE AND NEARBY ROADS

Recent Events:

Stanford Weekend Acres [SWA] is an old subdivision in San Mateo County, adjacent to Stanford University and squeezed between San Francisquito Creek and Alpine Road; home to several hundred people. These residents have been desperately trying to get some improvements with respect to the traffic congestion and dangers caused largely by Stanford commuters and suppliers. The same is true for the many people residing along Santa Cruz Ave, Alameda and side streets, both within San Mateo county jurisdiction and the City of Menlo Park. The data presented by the GUP as to traffic and *purported* public transportation is inaccurate and completely misrepresents the situation.

What the County and City Have Been Doing:

Santa Cruz/Alameda: A task force has been set up that meets to discuss potential mitigations. This involves considerable manpower by the agencies concerned as well as community effort. There is a combined Enforcement Unit for the Alameda/Santa Cruz Area which adds to the person power burden. The sheriff and the CHP installed portable radar trackers. The speed limit was reduced to 25 mph to reduce accidents, and this also involves extra person power to monitor. There have been several "near misses" with respect to children on the route to La Entrada. The senior residents of Menlo Commons have experienced multiple incidents of vehicles bound for Stanford using the middle access lane outside their building as an additional means of making a left turn to get to the Hospitals. To resolve this it is going to take engineering time and equipment to mitigate. The senior citizens are also experiencing dangers with respect to their crosswalk in front of the Menlo Commons because of all the traffic going to and from the hospitals. The only way this can be remedied is by a pedestrian activated crossing light and restriping, which will be expensive.

Alpine Road: Residents of SWA are virtual prisoners in their homes at various times of the day owing to Stanford commuters and suppliers. Traffic ignores the STOP signs for the school buses and drivers overtake in the oncoming lane in their haste to get to Stanford. Cars have been using the bike lane and the pedestrian path as a secondary vehicular lane, and parents are in fear of their lives when walking their kids to the school bus stop. There have been several accidents in the vicinity of Wildwood Lane and at least a few of those were caused by documented SU employees.

What the county has done recently to help with the traffic situation along Alpine:

There have been several county sponsored community meetings

The STOP signs were replaced with larger ones at I-280 and "Botts'-dots" added to reduce speed

Engineering studies were undertaken of Alpine traffic

The speed limit was reduced to 35 mph

They have deployed extra sheriff patrols (assisted by the CHP) involving several vehicles and motor cycle units on overtime

Solar powered radar equipment has been installed

Solar powered speed checking devices have also been installed along the road

Extra white lines have been installed to delineate the bike and pedestrian lanes

"Bots" have been installed to emphasize bike lanes

Some plastic "Stanchions" have been installed (in lieu of steel barricades) to better mark the bike lanes in places. More are needed especially near Wildwood, and a better solution is needed to protect cars going in and out of the frontage road.

Traffic chaos recently occurred at Webb Ranch (a Stanford lessee) because of their Christmas Tree lot and the county Code Enforcement unit issued a violation because there was no permit, and traffic was making a U-turn across Alpine by the 280 off ramp.

The bizarre parking at the Dish back entrance at Piers Lane requires both traffic enforcement and sheriff monitoring because of the proliferation of thefts from those parked vehicles.

FINANCIAL IMPACT OF THE ABOVE ON SAN MATEO COUNTY TAX PAYERS:

All of the above costs money that could be used by the county for other improvements. Obviously Stanford is not the only generator of traffic, but in this area of San Mateo it is the dominant cause of problems for San Mateo county residents. Just the constant flow of large trucks must have a significant detrimental impact on Alpine road, which is just not suitable for the amount and type of traffic to and from Stanford facilities.

Attached are a few pictures of the engineering improvements that San Mateo County Public works has financed. Alpine Road cannot support any additional traffic to and from Stanford facilities, and given the **complete dearth of public transportation** in this area apart from school buses, the "No New Net Trips" mantra is totally meaningless with respect to San Mateo County roads. In addition to the above, there are huge problems within the City of Menlo Park's jurisdiction along Alpine, Santa Cruz, Sand Hill, and Alameda: all of which are presently, and will in the future, cost that City a lot of money to remedy.

CONCLUSION:

The massive expansion planned by the GUP is unwarranted and cannot be supported by the present infrastructure of San Mateo County and the City of Menlo Park. Even with a more moderate rate of growth, some large infusions of cash and engineering talent are needed to make any quality of life sustainable for local residents.



6 Attachments

>>>>>

Comment Letter I-Schiano

From: Janet Davis [REDACTED]
To: David Rader <david.rader@pln.sccgov.org>
Sent: Saturday, November 18, 2017 1:04 PM
Subject: OPPOSITION TO STANFORD'S 2018 GUP

MY PERSONAL EXPERIENCE RELATED TO STANFORD DEVELOPMENTS RELATIVE TO ITS PROPOSED 2018 GUP

BASIC PROBLEMS WITH THE GUP:

It only deals with the specifically and **narrowly defined core academic boundary**, totally ignoring the **cumulative impact on the entire surrounding area**, of Stanford build out and proposed projects at, for example:

- The massive Hospitals rebuilding,
- Ronald McDonald expanded housing,
- The Shopping Center additions,
- The Page Mill industrial park rebuilding,
- The developments along El Camino Real in Menlo Park,
- The athletic facilities that attract thousands of fans,
- The Golf Course and its catering operation,
- [2131 Sand Hill](#) and other leasehold facilities along Sand Hill (including the Rosewood Hotel),
- The Quarry Road project,
- The huge developments in the Arastradero/Coyote Hills area,
- The various satellite functions such as the Eye Center on Embarcadero East, the Imaging Center on Sherman Ave,
- The huge Redwood City Campus, or
- The expansion at SLAC (including the Guest House).

All but two of the above are either in San Mateo county and/or require I-280 or San Mateo Road access.

This GUP **also focuses almost exclusively on Santa Clara County impact**, ignoring the consequences in Menlo Park, Ladera, Portola Valley, Atherton, and Redwood City: all in San Mateo County, which is going to bear the brunt of the consequences from the proposed development.

This defeats the entire purpose of CEQA under Section 15064.3 which seeks to examine the **cumulative effect** of a project and its impact on the **surrounding communities**. The GUP is also flawed in that it uses the discredited **"No New Net Trips"** figures that do not deal with issues area by area. For example, a commute credit may be assessed in one area, leading to added traffic in another. The fact that under the GUP **Stanford is proposing to build 2000 parking spots in the core academic boundary belies the university's assertion that there will be no new net trips!** Mr. Girard of the Santa Clara Planning Dept. at the Menlo Park meeting on November 15 attempted to explain this away by saying that the parking spaces might be used for storage. This is just not credible. To plan for 2,275,000 extra sq. ft. of facilities and at least 10,577 additional workers, adding that there will be more vendors, deliveries, conferences and tours only adds to the lack of credibility of the assertion. An early summary of the GUP stated that the core campus currently has around 500,000 visitors annually.

The traffic data is also tabulated via the **VMT method [Vehicle Miles traveled] (rather than the locally applied LOS method)** to avoid the patently obvious fact that traffic in the vicinity of the university is over-capacity. This is largely due to the university's constant expansion, and the fact that the **housing/jobs imbalance** (also accentuated by the university's constant construction) is causing many of its lower income employees and other local workers who cannot afford local housing prices, to commute long distances, adding to the traffic woes.

Santa Clara County is not going to get much in the way of property taxes from all this development and San Mateo County is going to bear the brunt of much of the resulting impact.

BASIS FOR MY OBSERVATIONS:

I have lived at [REDACTED], Menlo Park, for 50+ years (before the 280 freeway was built, before Sand Hill was widened, and before the right turn lane was added to the Alpine/Junipero Serra intersection). I drive back and forth along Santa Cruz and Alameda several times a day and often drive down Junipero Serra to Los Altos, as well as down Alpine to Ladera and Portola Valley. I also frequently drive up and down Sand Hill Road and many of the streets that cross Santa Cruz and Alameda, and along Avy and Monte Rosa to Sand Hill. Therefore I have **extensive personal knowledge**, over many years, of the traffic conditions that have existed, and presently exist in the entire area around West Menlo Park, into Redwood City and south to Los Altos. I am also part of a County of San Mateo Task Force that is addressing the safety aspects of all modes of traffic (cars/bikes/pedestrian/public transportation) in the vicinity of the Sand Hill/Santa Cruz intersection. Considerable research has been done by local residents and the county in this area and it can be viewed at: <https://publicworks.smcgov.org/santa-cruz-avenue-corridor-study>. Particular attention should be paid to the **resident-drafted** documents at [Univ.park.org](#) which list the problems and potential mitigations for the drastically increased traffic being experienced in the area of the Sand Hill intersection. That site contains several photographs and documents 21 accidents in the last year. There have been multiple meetings with County and City officials, the Sheriff, MPPD, CHP and the Fire District in the search for solutions.

However, the basic problem is that **all** the roads surrounding the Stanford Campus are overloaded to beyond saturation point and the fact that there is virtually no public transportation apart from school day bus service for the local high school. Also, I have followed traffic at various times of day and know that the vast majority of it goes to, or comes from, Stanford facilities.

WHAT HAS HAPPENED TO TRAFFIC, PARTICULARLY SINCE 2000:

Alpine Road background:

Alpine Road is a narrow, two lane road with several blind curves that has speed limit of 35 mph. **Back in 2000** it was estimated that it carried over **20,000 vehicles/day**. This number has increased very significantly. It is bounded on the west side by very steep hills subject to erosion. On the east side, below the level of the road is the Stanford Weekend subdivision with around 150 homes bordering the San Francisquito Creek, which frequently floods. Also, late in the evening and at night, deer frequently cross Alpine from Stanford lands on the east to SLAC on the west side. On the West side (owned by Stanford) there are grazing fields, an equine hospital and a horse barn. These facilities frequently have slow moving agricultural vehicles such as tractors, or trailers with 12-16 horses coming and going. There are no traffic lights.

On the East side there are several *cul de sacs* as well as individual driveways exiting directly onto Alpine. Currently there is substantial remedial bank construction to fix drastic subsidence of the banks endangering major gas and water lines. In the past there have been several accidents involving vehicles going over the creek embankment. There is no drainage system in this area and water flows off the westerly hills towards the creek making winter driving especially hazardous during inclement weather. Other factors include the back entrance to the Stanford dish which attracts numerous vehicles that park (legally and illegally) on both sides of the road, the back entrance to the Hewlett Foundation and the back entrance to SLAC: all of which cause significant safety problems.

Comment Letter I-Schiano

Law enforcement along Alpine is virtually nonexistent because it is the responsibility of the understaffed CHP. Because of this lack of enforcement and nonexistence of traffic lights, commercial vehicles especially, opt for Alpine over Sand Hill, even sometimes when their destination is Sand Hill Road. During Stanford's recent hospital construction neighbors counted double semi dump trucks at the rate of one every 17 seconds for a period of time.

There are **no traffic lights that would allow vehicles to platoon** along Alpine, affording residents an opportunity egress/ingress to and from their property. The traffic into Piers and Ansel Lanes (Stanford lands) is sufficient to fit the State's warrant requirements for a light, but absent costly reconfiguration of the 280 on/off ramps, this would be counterproductive for throughput.

When Alpine is not gridlocked, it is a speedway, despite law enforcement's best efforts. San Mateo County has recently spent money installing KEEP CLEAR signs and radar speed signs to try and control the traffic, which has had a less than stellar result.

Changes in Traffic Patterns Near Campus and Results Thereof:

My observation has been that in the last 10-17 years, the volume of vehicles has probably doubled between 280 and Junipero Serra, and that there has been a significant increase in construction and service vehicles such as flatbeds, double semi dump trucks, concrete trucks, delivery vans, etc., much of which comes and goes to University sites.

Morning Problems on Alpine/Sand Hill/Santa Cruz Heading Towards Stanford :

(I know that the majority of vehicles in the morning head towards Campus Drive West, the Golf Course, or the Hospital, because I have frequently followed them and, with respect to construction vehicles, have even taken some of their license no's and forwarded them to Stanford.) Alpine never used to be a truck route and was not so indicated on Stanford's website. Around the time of the Sand Hill widening it was so designated, despite the fact that the entire length of Junipero Serra (even between Alpine and Campus Drive West) is signed, banning all trucks over 7 tons.

In the morning the vehicular onslaught on Alpine now starts around 5 a.m. By around 7:15 a.m. cars are bumper to bumper backed up along the freeway from both the north and south, and this gridlock continues all the way down Alpine, thence down Junipero Serra to Campus Drive West and beyond, and down Sand Hill to the Hospital. Motorcyclists, trying to avoid the back-up, frequently use the bike lane. Some drivers even try to overtake in the bike lane and, sometimes, even on the path.

The two far right lanes at the Alpine/Junipero Serra intersection stretch back the full length of the turn lane, and traffic, which is bumper to bumper, goes all the way back to 280. I have great difficulty getting out of my driveway to turn right until around 10:30 a.m. A left turn is almost impossible, requiring me to drive to Sand Hill to make a U-turn. Because of this back up, drivers on Alpine wishing to go to Santa Cruz or Alameda opt for the left hand lane to get through the Alpine light (otherwise one has to wait up to 6 iterations to go through this light).

Once in the **area between the Alpine and the Sand Hill lights**, the entire right hand lane and bike lane is frequently blocked by vehicles trying to get to the hospital. This has a number of consequences:

- The bike lane is totally blocked, so many cyclists from Alpine heading towards Santa Cruz Ave, race down the trail under the cantilevered section making it too dangerous for pedestrians and less proficient cyclists. There have been several accidents here. It has become too dangerous for Stanford Weekend Acres (SWA) children to walk to La Entrada school, so their parents drive them, creating more traffic.
- Other cyclists heading towards Santa Cruz, Alameda or upper Sand Hill weave in and out of the lanes of traffic jockeying for position, resulting in many near misses
- Cars waiting at the Sand Hill intersection to make a right turn towards the hospital, block cyclists coming from upper Sand Hill road because they are parked over the entrance to the trail going along the golf course **and** the actual bike lane on the roadway
- Vehicles coming north from Junipero Serra hoping to cross the two lanes of traffic between the two intersections and make a left turn towards SLAC, are totally blocked by the queueing vehicles in the right hand lane, and traffic backs up along Junipero Serra
- When the light is RED at Sand Hill, those drivers wanting to make a right turn from the area between the intersections, towards the hospital, rarely stop which has resulted in many near misses. (The same is true with respect to the red light at the opposite corner of Santa Cruz and Sand Hill where drivers going from Santa Cruz to upper Sand Hill, breeze through the red light)
- Drivers aiming for Downtown Menlo Park after crossing Sand Hill then have to change lanes within the one block between Sand Hill and the juncture of Santa Cruz and Alameda. I have seen as many as 7 lane changes in that one block. This is highly dangerous (especially for cyclists because there is no bike lane) since the east side of that block of Santa Cruz is lined with multiple driveways, many of which are well below street level. In the past year there have been 21 accidents in the immediate vicinity
- Since there are no Stanford signs indicating the route to the hospitals, many drivers are confused and end up in the left hand lanes instead of the right hand lanes. Many of them subsequently veer across all the lanes to make the right turn lane, creating yet more hazards.
- The vehicle lane changes in the first block of Santa Cruz after the Sand Hill intersection, make it virtually impossible for homeowners along that block to exit or enter their driveways.
- Another problem with the jammed Sand Hill intersection is that many commuters try to avoid it by cutting through Palo Alto Way which is a very narrow residential street.

In the early morning, because of the increase in traffic, it sometimes takes me 45-50 mins. to get to the Menlo Park Burgess City Center instead of the 10 mins it should take me. If I try to come home before 10:30 a.m., I am stuck in the middle of Alpine with vehicles careening around me to the right, until some kindly soul allows me to make a left turn into my driveway. This is the same for every other SWA resident along Alpine.

Vehicles Heading South towards Campus Drive West from Sand Hill or from Alameda:

In the morning there is heavy traffic. There is a problem with the merge lane immediately south of the Sand Hill/Santa Cruz intersection in that vehicles try to overtake on the inside because of congestion. This occurs mornings and evenings.

Morning Problems with Alameda

Because of the access problems with respect to 280, Alameda becomes jammed with traffic, much of which is trying to get to Stanford. This creates a major problem for example, for those 174 residents of Menlo Commons trying to exit or enter their condominium development or for other University Park residents to access Alameda/Santa Cruz. Traffic is often so heavy that some drivers intent on getting to the hospital use the middle turn lane to overtake traffic on the inside to get ahead in the line to turn left to go to the hospital. This endangers residents of Menlo Commons trying to make a left turn to get to downtown Menlo Park.

Evening Problems with Alameda

Because it is so difficult to access I-280, traffic (mostly from Stanford facilities) jams Alameda from Sand Hill, through Atherton, to Woodside Road in Redwood City.

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cont.

Comment Letter I-Schiano

Evening Problems on Alpine/Santa Cruz/Sand Hill

"Rush Hour" now starts around 3:15 p.m. which seems to coincide with some kind of shift change at the hospital since vehicles start pouring out of Pasteur Drive and head towards Sand Hill or Alpine. Sand Hill becomes a virtual parking lot from Pasteur to 280. Alpine Road is also jammed from the Sand Hill/Alpine intersections to 280. This makes it almost impossible for SWA residents to make a **left** turn onto Alpine. Another problem involves vehicles exiting the back entrance of the Hewlett Foundation and making a highly perilous and illegal left U-turn to get to Junipero Serra. Some of these vehicles have the Stanford logo on their side.

Alameda is the location of a MPFD station. They are the first responders to any emergency in the West MP area, SWA and for accidents on 280. The fire engine and ambulances are often blocked by the traffic jamming the intersections and the roadways from Alameda to 280. Sometimes they have to use the residential Avy, Monte Rosa and Sharon Park roads to get better access to I-280.

Morning Problems on Junipero Serra

Traffic is usually solidly blocked from Alpine to Campus Drive West and heavy all the way to Page Mill.

Evening Problems on Junipero Serra

Traffic heading south to the Page Mill 280 entrance is very heavy from Campus Drive West and is virtually a parking lot from Stanford Ave to Page Mill. Traffic heading north to the Alpine 280 entrance or towards Alameda, is also frequently a virtual parking lot from Campus Drive East.

Problems on Avy/Monte Rosa

This has become a cut through route to and from 280 for traffic trying to avoid some of the back-up problems. This traffic is often exceptionally fast and is a danger to local residents and to students at Philipps Brooks School.

Traffic on ECR in San Mateo County

In the morning it is bumper to bumper from Woodside road to the university. In the evening, the reverse is true.

Cyclist/Pedestrian Problems Coming or going to Stanford

There is no pedestrian crossing on Junipero Serra or at the Alpine intersection. This means that people walking to and from Campus Drive West have no safe way to cross Junipero Serra to get to SWA because of traffic. If they want to go from Junipero Serra to Menlo Park they have to walk in the bike lane over the creek, which is often blocked by cars. If cyclist commuters want to bike from Campus Drive West to SWA homes there is no safe way to cross Alpine Road because of the increased traffic causing many high speed bikers to use the footpath along SWA which is extremely perilous for residents.

The brick surface surrounding the Buck Estate is blocked by metal rails for pedestrian travel, yet this is used by people coming out of the Hewlett Foundation trying to walk around the corner to Safeway on Sand Hill road. If there were a pedestrian crossing at the Alpine/Junipero Serra intersection this would mean that this path could be used by local residents to avoid the dangers of the eroding and non ADA compliant "trail" under the cantilevered section between the two intersections.

HOUSING ISSUES IN THE VICINITY OF THE UNIVERSITY:

Housing affordability is an issue throughout the State. However, in the vicinity of the university this is particularly evident. There are many visiting scholars requiring short term rentals and postgraduates seeking leased accommodations. Demand has driven up rents, increased the number of "doubled up" lessees, and created a burgeoning AirBnB industry which will only add to traffic woes in the future. It has altered the character of SWA from an almost exclusively owner occupied residential neighborhood to a more profitable rental market.

HOW THE UNIVERSITY'S GROWTH AFFECTS MY & OTHER RESIDENTS' QUALITY OF LIFE

I appreciate the great medical facilities and the increased diversity in my neighborhood, but it has come at the expense of some aspects of the quality of life, especially related to traffic issues, a summary of which entails:

- Inability to get in and out of my driveway because of traffic, most of which is Stanford based
- Danger on the road because of traffic congestion and constant fear of an accident
- The neighborhood path in SWA has become too dangerous to use because of cars veering onto it, and because cyclists use it in both directions
- The "trail" put in by Stanford that runs under the cantilevered section of Junipero Serra/Santa Cruz is non ADA compliant, and that together with the excessive use by high speed cyclists has made it too dangerous for safe pedestrian travel.
- Closing down of Webb Ranch Fruit Stand because of dangerous traffic means that fresh produce is no longer so easily available
- Removal of bus stop from Alpine because it was too dangerous to use because of added traffic
- Failure of traffic to stop for school bus at Stowe and Bishop which means that commuters cross the yellow line into oncoming traffic to get to their destination. This also happens on Garbage days, which is extremely perilous for local residents and commuters. When cars **do** stop for these vehicles they back up and block the KEEP CLEAR zones making it impossible to get into or out of my driveway
- Necessity of traveling out of my way to make a safe U-turn at Sand Hill in order to drive to Portola Valley
- Enormous amount of noise from the increased traffic most of which is destined for Stanford
- Oily storm water residue from excessive number of vehicles on Alpine, most going to or from Stanford
- Heavy odor of diesel from the many construction trucks going to and from Stanford and other locations
- Increase in number of student renters who often are very noisy compared to average families
- Increase in amount of time it takes to get anywhere because of traffic in West Menlo Park
- Increase in number of accidents and the associated noise from sirens
- Massive increase in construction trucks, many going to Stanford
- Difficulty in negotiating route to the hospital, especially to the ER when it has become necessary because of lack of signs and traff

...

[Message clipped]

From: Mail Delivery Subsystem <mailer-daemon@googlemail.com>
Date: Tue, Jan 23, 2018 at 11:19 AM
To: [REDACTED]

Comment Letter I-Schiano



Address not found

Your message wasn't delivered to potahki@menlopark.org because the address couldn't be found, or is unable to receive mail.

The response was:

550 No such user (potahki@menlopark.org)

Final-Recipient: rfc822; potahki@menlopark.org

Action: failed

Status: 5.0.0

Remote-MTA: dns; smtp.menlopark.org. (149.20.89.8, the server for the domain menlopark.org.)

Diagnostic-Code: smtp; 550 No such user (potahki@menlopark.org)

Last-Attempt-Date: Tue, 23 Jan 2018 11:19:00 -0800 (PST)

----- Forwarded message -----

From: Diane Schiano

To: Michael Callagy <mcallagy@smcgov.org>, Don Horsley <dhorsley@smcgov.org>, Steve Monowitz <smonowitz@smcgov.org>, Diana Shu <dshu@smcgov.org>, Joe Lo Coco <jlococo@smcgov.org>, Warren Slocum <wslocum@smcgov.org>, Raymond Mueller <rdmueller@menlopark.org>, Kirsten Keith <kkeith@menlopark.org>, "potahki@menlopark.org" <potahki@menlopark.org>, Catherine Carlton <cat.carlton@me.com>, "R. CLINE" <rcline@menlopark.org>, supervisor.simitian@bos.sccgov.org, city.council@cityofpaloalto.org

Cc:

Bcc:

Date: Tue, 23 Jan 2018 11:18:25 -0800

Subject: Objections to Stanford's GUP; implications for SWA and Alpine Road x Piers Lane traffic, congestion, parking

Hello,

I am writing for myself, my husband, Rick Voreck, and my son, Christopher Voreck (age 19). We live at [REDACTED], which is located directly at the [REDACTED] intersection in unincorporated San Mateo County. We are part of the neighborhood known as Stanford Weekend Acres. We experience intense traffic congestion and speeding problems (depending on the time of day and day of week) every day, just trying to get out of our driveway. The "informal parking" of so many cars right above our property (as part of an easement, in fact) so that people can walk in the Stanford Open Space magnifies the problem, adding congestion and chaos. There are times when a left turn--and sometimes even a right turn--from Piers onto Alpine will take 10 minutes!

We have read summaries and reviews of the proposed Stanford GUP and are extremely concerned about its impact on us, on our neighborhood, and on other neighborhoods in the area surrounding Stanford.

We are discouraged by Stanford's inclusion of 2.275 million square of feet of academic and academic support space and 3,150 housing units, translating to a population expansion of over 9,600 people in this area.

The traffic situation on Alpine Road after 280 and up to Junipero Serra is already nearly untenable, and this will only make it worse. We have complained and asked for mitigations in various ways and to various agencies...when we were notified (which has not always been the case). Our concern is especially great after Stanford's previous GUP, which was supposed to have no net increase in traffic. BULLSHIT! And the misleading way in which mitigation clauses were interpreted so as to push for expansion of public roads near the Stanford Open Space--in San Mateo as well as Santa Clara counties--rather than the "paths" in the Open Space, which was clearly the intent. BULLSHIT ON TOP OF BULLSHIT!

More generally, we agree with Peter Drekmeier that *Stanford should be required to specify a maximum build-out, which should be debated by the public.*

We agree with the Objections to the GUP that have been presented by many before us, including, most notably, Janet Davis, also of Stanford Weekend Acres./

I've pasted some of her messages, including a very compelling video of what goes on at our intersection regularly, below. I've also attached some photos I've taken, but unfortunately, the congestion that makes turning so difficult is hard to photograph, especially now that "Keep Open" notices have been painted on the street. (These are somewhat helpful, but not

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Comment Letter I-Schiano

enough). But the fact that cars are stacked up onto 280 at our exit, which is common knowledge, should be compelling enough.

The untenable parking and congestion problems we experience are directly due to Stanford. Parking should not be permitted, or should be highly regulated, at this intersection. We'd love to have a stop light or stop sign, and have requested this many times. Anything else that could be done to mitigate these problems would be appreciated.

↑
14
cont.

...Janet Davis [REDACTED]
Re: Alpine Road problems by Piers Lane
Jan 18 (5 days ago)
.

to Diana, Michael, Don, Rick, me, Dave, John, Christina, Jim, Rebecca, Robert, Susie

Gunter took some pictures of the problems caused by parking for the Dish back entrance last weekend (Piers and Ansel Lanes). My observation has been that this happens in the early mornings and is especially bad when the weather is good. What you do not see in his pictures (see below) are all the cars parked on Ansel Lane, the occupants of which also race across the road. Note all the cyclists that have to venture out into the vehicle lanes and the (one of many) cars doing a U-turn from the Dish to head back towards I-280. I think that it
----- Message truncated -----

↑
15

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Diane J. Schiano
<https://sites.google.com/site/dianejschiano/>

5.2.3.150 Responses to Comments from Diane Schiano

- I-Schiano-1 Existing traffic congestion on Alpine Road is noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, and Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.
- I-Schiano-2 With respect to specifying a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Schiano-3 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.
- I-Schiano-4 Please see Response to Comment I-DavisJ2-1.
- I-Schiano-5 Please see Response to Comment I-DavisJ2-2.
- I-Schiano-6 Please see Response to Comment I-DavisJ2-3.
- I-Schiano-7 Please see Response to Comment I-DavisJ4-1.
- I-Schiano-8 Please see Response to Comment I-DavisJ4-2.
- I-Schiano-9 Please see Response to Comment I-DavisJ4-3.
- I-Schiano-10 Please see Response to Comment I-DavisJ4-4.
- I-Schiano-11 Please see Response to Comment I-DavisJ4-5.
- I-Schiano-12 Please see Response to Comment I-DavisJ4-6.
- I-Schiano-13 Please see Response to Comment I-DavisJ2-1.
- I-Schiano-14 Please see Response to Comment I-Schiano-1, above.
- I-Schiano-15 Please see Response to Comment I-Schiano-2, above.

County of Santa Clara
 Department of Planning and Development
 Att: David Rader
 County Government Center
 San Jose CA 95110
 Re: Stanford University 2018 General Use Permit

January 29, 2018

STANFORD'S IMPACT ON LOCAL CONGESTION:
 IS IT ADEQUATELY MEASURED?

Under Stanford's 2018 General Use Permit, the projected growth of the University campus (2018-2035) has a number of traffic impacts on local intersections and freeways that even after suggested mitigations remain 'Significant and Unavoidable'.

1

A key issue is whether the EIR sufficiently addresses the full range of congestion and traffic issues raised by the 2018 General Use Permit application and adequately assesses the realistic options available. Let us look at five specific issues that may require special attention:

1. Geography. Stanford lies within a fairly narrow band of intense development on the San Francisco Peninsula. Stanford and the surrounding communities of Palo Alto, Menlo Park and Mountain View are located in a fairly narrow five mile strip of land geographically bounded by the San Francisco Bay immediately to the east and the heavily protected open space lands of the Santa Cruz Mountain foothills to the west. This restricts the vast majority of inbound commute traffic to the Dumbarton Bridge and five north-south highway corridors where access ramps and intersections are already experiencing significant delays.

2

2. The underlying expansion of jobs over housing. With the limited developable land, the growth of Silicon Valley (with Stanford's unique role in the center of that growth) and the underlying business dynamic that thrives on small and large firms in close proximity means that new non-residential office and meeting space has been expanding much faster than new housing. The current situation in and around Stanford involves a very high ratio of jobs to employed residents and a subsequent dependence on a very high and growing commute base. In fact, Palo Alto has a current ratio of three jobs in the city to every employed resident, one of the highest in the country among cities of over fifty thousand. The Stanford campus has a similar ratio of close to three student/faculty/workers for every on-campus resident (*Stanford GUP*, Tables 5.12-4-6). The recent expansion of the global headquarters campus of Facebook in Menlo Park and Google in Mountain View will exacerbate that ratio. The Transportation Analysis Appendix forecasts rapid unbalanced growth in the surrounding communities: over the years 2016-2040 it forecasts that the ratio of new jobs will grow four times as fast as new households in Palo Alto and 3.5 times as fast in Menlo Park (*Stanford GUP, Transportation Impact Analysis Part 2, Forecasting Report, Tables 4-4 and 5.3*).

3

3. Stanford's role. Stanford will have a major role in this growing regional imbalance of jobs to employed residents. Only thirty percent of new off-campus Stanford household increases will be

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accounted for in Palo Alto, Mountain View and Menlo Park. This will lead to substantial longer distance commuting (*Stanford 2018 GUP*, page 5.12-17 and Table 5.12-11). Further, between 2018 and 2035, Stanford will be adding approximately 5.7 million square feet of non-residential square footage on the campus and on other nearby lands controlled by Stanford. That includes the 2.3 million expansion of non-residential space on campus included in the GUP, 1.3 million in the Stanford University Medical Center (already under construction and due to come online over the next few years), 0.8 million new square feet of targeted expansion in the adjacent Stanford Research Park, and the 1.3 million square feet new campus business center in Redwood City just five miles from campus. With under 4000 new housing units planned on Stanford lands in these areas that is sure to raise the already high jobs to employed resident ratio dramatically in and around the campus and lead to longer commutes.

4
cont.

4. Rail as the answer: With so many cars on the highways bringing commuters from ever lengthening distances (and slow buses using the same routes), rail is identified as the potential solution. The EIR states that “the CEQA Guidelines include a presumption that development projects that are located within one-half mile of an existing major transit stop will not cause a significant transportation impact” (*Stanford GUP*, page 5.15-37). In fact, the EIR proposes that the Stanford TDM solution would be to switch drive alone commuters in single occupancy vehicles (SOV) to Caltrain ridership (page 5.15-156). But this ignores current Caltrain limitations. The rail line runs through a portion of a narrow land corridor in which jobs radically outnumber residences with many stations close to job centers surrounded by built out suburban landscapes. Further, the current rail system is at capacity and expanding the frequency of trains and the numbers of cars will mean extensive blocking of the critical east-west corridors that bring cars, shuttles and bicyclists from commute corridors to job centers. Expensive grade crossings and rebuilding of platforms are needed to make this work. The EIR does not address the obvious need for funding for upgrading the Caltrain infrastructure.

5

5. No Net New Commuter Trips: Stanford has set a major goal of keeping all campus commute trips at the level measured in 2001 despite its growth in campus activities. The County is responsible for measuring such activity annually. But the GUP allows Stanford to offset any net new trips to the campus by earning credits through reducing the number of trips in the areas surrounding the campus (page 5.15-88). If the reductions don’t lower the net new trips to zero, Stanford would then have to pay a fee (page 5.15-90). But it is hard to find concrete details on the cost and effectiveness of specific credits. For example, one source of credits is the Stanford Commute Club (*GUP Trip Credits: Guideline 3 Commute Club Members*). This club pays employees of Stanford Hospital and Clinics and Welch Road buildings (which are off-campus) for utilizing non SOV modes so the University can earn offset credits (page 3). But these employees are already earning credits for such non-SOV travel through the SUMC mitigation with the City of Palo Alto. Are these credits being double-counted? Another source of credits are to park automobiles on Stanford land outside the campus cordon and bus people to campus. This keeps cars from the campus but does not reduce traffic on the highway corridors. Detailed trip credit information and it impacts on surrounding corridors should be readily available for all interested parties.

6

The County’s examination of the EIR should include a broad look at the geographical context of the proposal, at Stanford’s interest in parcels that happen to be subject to other jurisdictions

7

review, and to the longer-term impacts of costs and quality of life in surrounding communities where existing and future congestion is already a critical issue. Stanford should be willing to pace the growth of all their key parcels inside this area to get reasonable and balanced growth that would support their own priorities and contribute to the health in the overall community that they will continue to live and thrive in. Stanford should be willing to contribute a fair share contribution to essential rail infrastructure.

The County has a responsibility to discuss the wider implications of Stanford's growth across multiple jurisdictions. The County should take into account the needed new rail infrastructure. Lacking substantial Stanford contributions to County Property tax or a fair share contribution for that needed infrastructure, the County must identify who will pay. The County must recognize explicitly in their approval for a greater reliance on rail that the most regressive of local taxes—the sales tax—is not an adequate answer to non-residential growth in an already unbalanced community.

7
cont.

Gregory Schmid

[REDACTED]

Palo Alto CA 94303

[REDACTED]

5.2.3.151 Responses to Comments from Gregory Schmid

- I-Schmid-1 General comments are raised regarding traffic congestion, and effects on the transportation system. 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.
- I-Schmid-2 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.
- I-Schmid-3 Please see Response to Comment A-PV-3.
- I-Schmid-4 Please see Response to Comment A-PV-3.
- I-Schmid-5 The Draft EIR presents information regarding the capacity of the public transit system to accommodate growth in ridership resulting from the proposed Project, but this topic is not treated as an adverse impact. The Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity.
- The Draft EIR explains on page 5.15-155 that the Governor’s Office of Planning and Research (OPR) recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.
- Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for additional detail on Caltrain capacity.
- I-Schmid-6 See Response to Comment I-Holzemer-6.
- I-Schmid-7 Regarding the comment made concerning consideration of Stanford developments in other jurisdictions, 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.
- Regarding the comment made concerning costs and quality of life in surrounding neighborhoods, socioeconomic issues, and other comments that do not address the adequacy of the Draft EIR, please see Master Response 1: Non-CEQA Comments.

February 1, 2018

To: David Rader, Senior Planner, Santa Clara County
From Kathy Schmidt - Planning Commissioner

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

1. Stanford Build-out

a. Please have Stanford complete a maximum build-out report as required by the 2000 GUP. The Sustainable Development Study of 2008 offers alternative scenarios, but does not define maximum build-out. The maximum build-out report should be completed before any new square footage can be built under the 2018 GUP.

1

b. Please have Stanford provide a map that shows what has been built under the Stanford 2000 General Use Permit, and what is anticipated to complete the build-out of the 2000 GUP.

2

c. Please also have Stanford provide a map that shows what build-out of the 2018 GUP might be after the 2000 GUP has been completed - the 2.275 million square feet of additional academic and support space. I understand that Stanford does not know the specific projects at this time, but Stanford showed this type of map in the Sustainable Development Study of 2008.

3

2. Academic Growth Boundary

p. 3-5, note 4. The 2018 GUP leaves the 2000 GUP Academic Growth Boundary (AGB), which was described in the Stanford Community Plan, in place until and after 2025, and it requires any changes to the AGB to be made by a vote of 4/5's of the Supervisors. Stanford needs to address and provide specific extension of duration for the AGB either permanently or for the very long term without the possibility of modification by 4/5's of the Supervisors. Many others have expressed concerns about this.

4

3. Traffic and Transit

Existing and additional traffic is a major concern. Stanford is working hard to try to reduce traffic to and from the campus. However:

a. Stanford only counts one hour in the busiest 2-hour commute time in the morning and evening (p.3-24, Note 15) for traffic count analysis. Since the commute is more spread out and traffic is challenging much of the day, is this methodology still good?

5

- b. The formula for No Net New Commute Trips allows Stanford to have credits for added bus routes, etc. Are these buses filled? Is this formula reasonable? Stanford also proposes to amend the trip credit policy to include those riding into the cordon area, even if they do not go into the traffic count area on campus (p.3-25). While this could help reduce some overall car traffic, I think the trip credits currently allowed to Stanford are very generous and this change should not be made. Also it seems that the title “No Net New Commute Trips” is misleading because the formula allows for credits against real commute trips as noted above. 6
- c. Is the traffic analysis area broad enough? There are many new and proposed projects on the Peninsula. A number of neighboring residents have asked this question. 7
- d. Many auxiliary functions have moved off campus - e.g., to Redwood City and to Hanover Street in the Research Park. Is the daily traffic between the main campus and these off-site locations included? If so, how? 8
- e. Is the Stanford population notified of the cordon counts and encouraged at these times to drive as little as possible? If so could this be distorting the cordon count? 9
- f. Where do Stanford commuters live? Although it’s great to improve accommodation for bicycles for all, how much does it help to improve bicycle routes and facilities, if most commuters are too distant? 10
- g. Stanford is relying heavily on CalTrain to support future commute population growth at Stanford. It is not a given that CalTrain (which is currently at capacity during commute hours) will be able to support many additional riders. Should the analysis consider this and look at other solutions? 11
- h. Stanford mentions working with adjacent municipalities for intersection improvements or commute alternatives, if necessary. Stanford could be proactive and work regionally and creatively within the Bay Area and make regional improvements that will benefit all. And working with others takes more time and effort, so it could be slow going. 12
- i. Are adequate electric car charging stations provided or planned for throughout campus for the growing number of electric vehicles in use today? 13

4. Alternatives:

Stanford is working hard to provide more housing, primarily for students, and this is important. But can additional housing be provided for various levels of staff both on and off-campus, e.g. East Palo Alto? Please provide alternatives that evaluate:

a. Half the academic space growth (1.1375 million s.f.) but the full amount of housing both on and off-campus for students, professors and staff (3,150 units/beds).

b. Full proposed academic space growth (2.275 million s.f.) but more housing both on and off-campus for students, professors and staff (more than 3,150 units/beds - e.g. add 35% more).

14

5. Affordable Housing p.5-12-20:

a. Stanford proposes to change the location of where affordable housing fees can be used to fund affordable housing projects. The 2000 GUP requires use of the fees in a 6-mile radius around Stanford, but Stanford wants to change that to ½ mile from transit hubs or corridors. Please maintain the 6-mile radius. It includes parts of many communities - Redwood City, Menlo Park, East Palo Alto, Mountain View, Palo Alto, etc. In any case, affordable housing must always be built near transportation to receive funding, so that concept always will be maintained.

15

b. Stanford proposes to continue to pay the same affordable housing development fees to Santa Clara County - \$20/academic gross square foot added - that it paid with the 2000 GUP. These fees must be increased to reflect real cost increases. Housing, including affordable housing, is very expensive to build and construction costs have sky-rocketed since 2000. Palo Alto charges developers \$35/sf for new commercial and research building construction to go to their affordable housing fund. Palo Alto considered \$60/sf. Since construction costs are in the hundreds of thousands of dollars per unit, Stanford should be required to pay more than \$20/sf. It should be \$35 or more per sf.

16

5.2.3.152 Responses to Comments from Kathy Schmidt

I-Schmidt-1 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study.

I-Schmidt-2 With respect to development built under the existing General Use Permit, please refer to the 2000 General Use Permit Annual Report 17 which identifies location of cumulative development activity built to date under the existing General Use Permit.⁴¹

No map can be provided for what is anticipated to be built under the 2018 General Use Permit. As discussed in the Draft EIR Project Description on page 3-19, no site-specific projects and locations have been identified for development under the proposed 2018 General Use Permit. Draft EIR Figure 3-8 on page 3-21 presents the development districts and the distribution of development within the campus under the proposed 2018 General Use Permit.

Please also see Master Response 5: Project Description, Topic 1: Level of Specificity.

I-Schmidt-3 As discussed in Response to Comment I-Schmidt-2, above, no map can be provided for what is anticipated to be built under the 2018 General Use Permit.

I-Schmidt-4 No changes to the existing Academic Growth Boundary (AGB) location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit, and this is a policy matter that the County Board of Supervisors may consider.

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

I-Schmidt-5 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Schmidt-6 Community Plan Policy SCP-C8 establishes a policy to “Credit participation in off-campus trip reduction efforts that benefit the streets surrounding the campus towards Stanford’s achievement of the ‘no net new commute trips’ standard.” In 2003, Stanford, the County Planning Office and the County’s transportation consultant discussed potential methodologies for providing credits to Stanford. The County developed a set of draft guidelines, which were reviewed by the Community Resource Group, and the Planning Office approved the final guidelines on October 9, 2003. These guidelines are presented in the “Stanford Traffic Cordon Count Credit Guidelines” dated October 28, 2003. The County

⁴¹ Located at <https://www.sccgov.org/sites/dpd/programs/stanford/pages/docs.aspx>.

Planning Office provided a revision to the guidelines to the Community Resource Group for review in April 2015, and the Planning Office approved the final revisions to the guidelines in October 2015.

Under the County-approved methodologies, the forms of trip reductions outside the cordon that are currently counted include: 1) Marguerite shuttle riders outside the cordon who are not traveling to a campus destination; 2) Hospital employees in the Commute Club; and 3) Hospital employees on the Stanford-subsidized East Bay bus service. Credits are submitted to the County for review as part of the annual traffic monitoring process and are reviewed by the Community Resource Group.

During implementation of the 2018 General Use Permit, Stanford can request that the Planning Office revise the credit guidelines if Stanford proposes new or different trip reduction credits. The process for revising the guidelines would be similar to the process followed during implementation of the 2000 General Use Permit. Mitigation Measure 5.15-2(5) explains that the County Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate, and the County Planning Office will require that Stanford provide evidence of its participation in the program in a manner that can be independently verified. Similarly, any proposal for credits associated with funding of off-campus circulation infrastructure improvements will be reviewed by the County to determine how and to what extent the infrastructure project would remove vehicular trips from the local impact area. 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.

In sum, the trip credits are for actual trips removed from the roads within the area that would be affected by trips to and from the campus. They are equivalent to removing a trip to or from the campus.

The change that Stanford proposes would recognize that as long as one end of the trip is within the impact area, the trip has been removed from the impact area. For example, if a new bus route funded by Stanford were to start in East Palo Alto outside the impact area and end at the University Avenue Caltrain Station inside the impact area, the trip would have been removed from the impact area.

Please also see Master Response 8: EIR Alternatives, Topic 1: CEQA Requirements for Alternatives and Alternatives Evaluated in the EIR, and Topic 2: Additional Detail on Potential Alternatives.

- I-Schmidt-7 Please refer to 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; and Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for information on how regional projects are reflected in the Draft EIR traffic analysis.
- I-Schmidt-8 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 for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).
- I-Schmidt-9 Stanford does not notify the cordon counts dates to its general population, but Stanford does let Public Safety and Grounds Crews know that the cordon count is in process. The cordon count happens for 8 weeks during the peak of the academic year. It would not be reasonable to expect that people would alter their commute patterns for such a long period of time. Stanford does encourage, through its TDM program for commuters to campus to take an alternative mode to campus all year long in order to meet the cordon counts, as envisioned Community Plan Policy SCP-C 1.
- I-Schmidt-10 Stanford conducts a travel survey annually, which includes information on the place of residence of Stanford commuters. Please see Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution for information on how the survey results inform the Draft EIR analysis.
- I-Schmidt-11 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB's input.
- I-Schmidt-12 The comment is noted but does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.
- I-Schmidt-13 The commenter does not provide a specific standard for what would be considered adequate electric car charging stations. The Draft EIR does not identify a significant impact on the environment that would be reduced by a requirement that Stanford provide electric vehicle charging stations. Electric vehicle charging is required by County Ordinance (A5.106.5.3 Electric Vehicle Charging), which states that at least five percent of the parking spaces of nonresidential structures

should be capable of supporting future electric vehicle supply equipment. Stanford has nearly 80 electric charging stations as of Fall 2018.

I-Schmidt-14 Please see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

I-Schmidt-15 The distribution of affordable housing funds are socioeconomic issues not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please see Master Response 10: Affordable Housing, Topic 5: Geographical Distribution of Affordable Housing Funds.

I-Schmidt-16 The amount of affordable housing fees are socioeconomic issues not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

From: David Shen, Palo Alto resident

Good evening Supervisors.

Stanford's General Use Permit application proposes to grow their campus significantly. As everyone knows this will have significant impact on Palo Alto both positive and negative. I am all for seeing the admirable institution grow and prosper. However, the current structure under which their growth is proposed to occur puts an unfair cost burden on the surrounding areas.

1

Their plans, if executed to the fullest, will introduce an incredible number of families, employees, and thus traffic into Palo Alto. I would urge that the Supervisors take the following into consideration when evaluating the Stanford GUP:

1. With the introduction of so many families into Palo Alto, it is likely we would see a surge of school age children into the area. I would urge that Stanford provide resources and funding to create room for their education, either expanding existing schools or creating new schools.
2. With the introduction of more people and employees into Palo Alto, the existing transportation infrastructure will be stretched to the maximum. I urge that Stanford should contribute to the infrastructure improvements necessary to support the proposed influx of new residents so that the cost burden is not placed solely on the residents of the Palo Alto community.
3. My understanding is that Stanford's research into the traffic impacts does not include traffic flows into the surrounding neighborhoods especially through North Old Palo Alto where I live. I also urge that Stanford include these traffic flows in its research and impact studies.

2

3

4

As you may know, it is not unprecedented that universities contribute some level of lost tax to their surrounding communities. For example, it is my understanding that Harvard/MIT and Boston University have long term agreements with their City to contribute 12-12.5% of lost tax. The Santa Clara county assessor has noted that Stanford has a tax exemption on over \$11.6B in property value. Think of what we could do with a portion of that lost tax revenue and the benefits we could realize here in Palo Alto.

5

I would urge the Supervisors to place these requirements – among others – on Stanford and gain their agreement, before accepting their new GUP application.

6

Thank you.

5.2.3.153 Responses to Comments from Dave Shen

- I-Shen1-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics. See also individual responses to comments, below, that follow.
- I-Shen1-2 Please see Master Response 12: Public Schools, Topic 2: Additional School Site.
- I-Shen1-3 The Draft EIR Section 5.15 Transportation and Traffic addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project, and identifies mitigation that reduces significant impacts to the extent feasible.
- I-Shen1-4 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods.
- I-Shen1-5 Issues related to taxes are outside the scope of this Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Shen1-6 This comment does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Shen2

From: [Dave Shen](#)
To: [Supervisor Simitian](#); supervisor.wasserman@bos.sccgov.org; supervisor.chavez@bos.sccgov.org; [Supervisor Yeager](#); city.council@cityofpaloalto.org; planning.commission@cityofpaloalto.org; [Cortese, Dave](#); [Rader, David](#)
Cc: [David Shen](#)
Subject: Comments on the Stanford 2018 GUP from Palo Alto Resident
Date: Wednesday, January 24, 2018 12:49:54 PM
Attachments: [Stanford GUP Comments David Shen 1-23-18.pdf](#)

Dear County Supervisors and Staff,

Thank you again for the opportunity to present my views on the Stanford GUP last night. The short 3 min talk I gave is attached in text form. 3 minutes is not enough time to go into all the issues. Please read below for some more comments regarding the Stanford GUP.

While the community recognizes the University's great intellectual and cultural contribution to the *broader S.F. Bay Area community*, our small city (Palo Alto) can not be expected to endure the impact and costs of the dramatic infrastructure requirements that would be required to sustain the proposed growth at acceptable traffic, environment and safety levels. Stanford must pay for the requisite infrastructure improvements prior to the approval of the 2018 GUP. The institution is growing well beyond our means. I urge you to stop all further development by Stanford until infrastructure and impact analysis is completed and requirements are placed upon Stanford to fund the necessary infrastructure improvements that would make their GUP proposals truly "**no net impact**" to our community.

Specifically, I find the following concerns with the 2018 GUP:

- Stanford's proposal should not be considered in isolation of the **significant existing transportation and traffic congestion problems** that the City of Palo Alto is already experiencing given the large imbalance between local jobs vs. locally employed residents. This ratio is one of the highest in the country, and contributes to an already existing traffic dilemma in our small residential community. 1
- University growth should not be considered in isolation given that it is tied to the Stanford University Medical Center (SUMC), the Stanford Research Park (SRP), Stanford Shopping Mall, SLAC, including the development proposed for [500 El Camino Real](#) in Menlo Park (429,000 SF of office, retail and housing). Looking at each site in isolation does not provide a full picture of the cumulative impacts to Palo Alto. 2
- The GUP claim of "No Net New Commuter Trips" is naive given the millions of square feet of development proposed. [Many reports detail the naive and poorly formed aspects of these claims.] 3
- The GUP claims that Caltrain usage will offset growth in daily employee road commuting are naive given that Caltrain is already at full capacity and can only practically address a fraction of total employee commuters. 4
- The GUP totally disregards the looming and alarming transportation and traffic congestion problems that will be created by imminent Caltrain electrification, increased traffic stops, and the likelihood of grade separation construction at various intersections, which will only add to the City's financial and traffic burdens. 5
- The GUP is absent any rigorous traffic impact analysis along the impacted main and secondary impacted corridors already strained by Stanford-bound traffic, including Embarcadero and University, as well as Churchill and Kellogg avenues. 6

We need to stop giving Stanford *carte blanche* rights to development in our community without making them carry the fair share of the financial burden needed to fund Palo Alto's transportation infrastructure that their growth requires. I propose that the County require Stanford to fund the following specific projects to offset their impact **prior to the approval** of the Stanford 2018 GUP:

1. Stanford should be required to work with the City on mutually agreeable traffic mitigation solutions.
2. Stanford should be required to fund Caltrain grade separation projects at the Churchill and Embarcadero intersections with Alma given that they're already at capacity and will become unmanageable with the proposed Stanford expansions.
3. Stanford should be required to fund the construction of pedestrian underpasses at Embarcadero Rd and Palo Alto H.S. given the already precarious danger facing students by Stanford-bound traffic, as well as the traffic congestion caused by the existing light.
4. Stanford should be required to fund the expansion from 3-lanes to 4-lanes on the 300 yard stretch of the Embarcadero Road underpass, which already causes gridlock at rush hour and will only be further exacerbated with more traffic flowing inbound/outbound of Stanford.
5. Stanford should be required to pay for the addition of left-turn traffic signals at the intersection of the Embarcadero Road Underpass and Alma road to facilitate the safe onramp/offramp of inbound/outbound traffic to Stanford along the Alma corridor.

Please hold Stanford accountable for these significant infrastructure investments prior to any approval consideration for the 2018 GUP. The City and County can not endure the proposed growth without holding firm to that requirement.

Thank you for your time,

David Shen
Palo Alto Resident

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I wrote a book about Yahoo!: Takeover! The Inside Story of the Yahoo! Ad Revolution. Buy it on Amazon: <http://amzn.to/2vIOpu4>. Sign up now for updates: <http://www.yahootakeoverbook.com>.

5.2.3.154 Responses to Comments from Dave Shen

- I-Shen2-1 Please see Response to Comment I-Hung-1.
- I-Shen2-2 Please see Response to Comment I-Hung-2.
- I-Shen2-3 Please see Response to Comment I-Hung-3.
- I-Shen2-4 Please see Response to Comment I-Hung-4.
- I-Shen2-5 Please see Response to Comment I-Hung-5.
- I-Shen2-6 Please see Response to Comment I-Hung-6.
- I-Shen2-7 Please see Response to Comment I-Hung-7.

Comment Letter I-Sloan1

Sandy Sloan

Menlo Park, CA 94025

January 27, 2018

Kirk Girard, Planning Director (kirk.girard@pln.sccgov.org)
David Rader, Senior Planner (david.rader@pln.sccgov.org)
Kavitha Kumar, Senior Planner (kavitha.kumar@pln.sccgov.org)
Joe Simitian, Supervisor (supervisor.simitian@bos.sccgov.org)

Re: Comments on the DEIR for Stanford's 2018 GUP Proposal

Dear County Planners and Supervisor Simitian:

My Comments are focused on Stanford's lands outside the Academic Growth Boundary ("AGB"). The Biological Resources Section of the DEIR in Section 5.3.2 states that [although Stanford is currently not proposing academic buildings outside the AGB], some infrastructure improvements and habitat improvements could occur outside the AGB. This begs the question: What infrastructure improvements? Roads? Parking lots? Large water tanks? This comment opens the door for all sorts of development outside the AGB.

1

Furthermore, the Biological Resources Section of the DEIR goes on to address construction OUTSIDE the AGB in Section 5.3-3 on the dusky-footed woodrat, in Section 5.3-4 on special status plant species, in Section 5.3-6 on steelhead trout, and in Section 5.3-7 on riparian habitat, concluding that construction outside the AGB could significantly affect these areas and then suggesting possible mitigations for the effects.

2

It is disingenuous of Stanford to state in its application for the 2018 GUP, and also in its summary documents presented to the public and in the DEIR, that "development authorized by the [proposed] GUP will be sited within the developed portion of the campus inside the Academic Growth Boundary" and then have the DEIR discuss possible effects of development outside the AGB.

3

As it stands, the DEIR is essentially conducting environmental review for actions that are not currently proposed. Such ambiguity could lead to Stanford later claiming that environmental review for development outside the AGB has already been completed.

I previously wrote on November 21, 2017 that since Stanford is currently proposing for development to remain inside the AGB, now is the time for the County to require that Stanford dedicate a permanent conservation easement over the Foothills

4

Comment Letter I-Sloan1

District in order to mitigate for the huge increase in density within the AGB. A copy of my previous letter is attached. Stanford currently has two permanent conservation easements and one conditionally permanent conservation easement adjacent to the Carnegie Foundation's campus and two fifty year no build zones in the foothills (See DEIR figures 5.3-2 and 5.3-3), but all of these are small in size. With the 3.5 million square feet of development now proposed to add to existing campus development, now is the time for Stanford to dedicate a permanent conservation easement over all of the Foothills District.

↑
4
cont.
↓

Thank you for your consideration.

Sandy Sloan

Attachment: November 21, 2017 letter

5.2.3.155 Responses to Comments from Sandy Sloan

I-Sloan1-1 through I-Sloan1-3

The Draft EIR Project Description Section 3.8.1 acknowledges some infrastructure improvements could occur outside the Academic Growth Boundary (AGB) within the Foothills Development District, such as underground pipelines, electrical transmission lines, water supply improvements, roadways and pathways and habitat improvements. Accordingly, the Draft EIR analyzes the impacts associated with development of infrastructure improvements outside the AGB, and identifies feasible mitigation to reduce all biological resource impacts to a less-than-significant level.

Please also see Response to Comments O-SCAS-5 through O-SCAS-7.

I-Sloan1-4

No changes to the existing AGB location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.

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

Comment Letter I-Sloan2

Sandy Sloan

Menlo Park, CA 94025

November 21, 2017

Kirk Girard, Planning Director
David Rader, Senior Planner
Kavitha Kumar, Senior Planner
Joe Simitian, Supervisor

RE: Comments on the Stanford 2018 GUP Proposal and the DEIR

Dear County Planners and Supervisor Simitian:

As a close neighbor of Stanford's, a graduate of Stanford Law School (1979), and a former land use and municipal attorney, I have many thoughts about Stanford's proposed 2018 General Use Permit ("GUP"). However, I'd like to focus on what I consider the most important issue: preservation of the Stanford foothills in their natural state.

As Stanford has developed over the 46 years I have lived nearby, the open space buffering the campus from its neighbors has greatly diminished. Housing on the hills adjacent to Page Mill Road was developed, Stanford West apartments replaced an open field, the hospital and science buildings have expanded to the West and housing has been erected along El Camino and Stanford Avenue in Palo Alto.

With the past density increases and the additional 3.5 million square feet proposed under the 2018 GUP, it is time for the County to require a permanent conservation easement over the foothills in return for so much new development in the flatlands. Requiring a conservation easement in return for a huge increase in development is a reasonable request. 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.

I realize that Stanford is not proposing in the 2018 GUP that development take place outside the Academic Growth boundary, but this is not enough assurance that the foothills will not be developed in the future. 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

1

Comment Letter I-Sloan2

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.

The value of the open space of the foothills to the community and Stanford itself is evidenced by the fact that the Stanford published booklet on the 2018 GUP labeled “Draft Environmental Impact Report/ Overview & Summary” shows—on both sides of its front cover—the campus framed by the foothills. I urge you to ensure that the now undeveloped foothill areas be permanently protected in return for allowing the intense development on the campus.

1
cont.

Thank you for your consideration.

Sandy Sloan

5.2.3.156 Responses to Comments from Sandy Sloan

I-Sloan2-1 With respect to holding capacity, please refer to 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.

With respect to permanent open space protection, no changes to the existing AGB location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit.

The County Board of Supervisors may consider extending the 4/5ths vote requirement beyond 2025 during consideration of the Project. Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.

Comment Letter I-Smedberg

From: [Virginia Smedberg](#)
To: [Rader, David](#)
Subject: about the Stanford expansion project
Date: Sunday, January 14, 2018 10:14:04 PM

Dear David: I have not read the EIRs, so I only want to make a few general comments, as a neighbor (both as a Palo Alto resident AND as an Earth inhabitant).

- 1) any added housing must include arrangements for parking the now-a-days minimum of 2 vehicles per family, plus parking for visitors.

1
- 2) any added buildings must have as much permeable surface as possible: buildings and roads usually block water from getting into the ground, and we need all the water that comes down from the clouds to go into the ground at or near where it lands, NOT to run off eventually to the Bay (which runoff generally collects pollutants). Suggestions include: rooftop gardens; permeable surface on all roadways and parking areas whose usual traffic is not too heavy for that; permeable surface on ALL non-road areas - sidewalks, walkways to buildings, patios etc.

2
- 3) all irrigation systems must be as efficient as possible, again to keep water in the ground in the immediate areas of application, not running off.

3
- 4) as much should be left as "open space" as possible - field and forest - build up, not out - one of the pleasures of Stanford's campus (and one of the reasons my parents moved to Palo Alto from San Francisco in the 1940s) is Stanford's open spaces - they liked to take walks in natural areas.

4

Sincerely,
Virginia Smedberg

PA 94301

5.2.3.157 Responses to Comments from Virginia Smedberg

- I-Smedberg-1 Please refer to Section 5.15.8: On-campus Parking Supply and Off-Campus Parking Restrictions beginning on page 5.15-170 of the Draft EIR for a discussion of how parking demand is calculated for Stanford land uses, including student/faculty housing. Based on existing parking rates, Graduate student housing is estimated to generate a demand of 0.55 parking spaces per bed, while undergraduate student housing is estimated to generate a demand of 0.23 spaces per bed.
- I-Smedberg-2 The Draft EIR Section 5.9 Hydrology and Water Quality Impact 5.9-4 (pages 5.9-25-5.9-27) states that under the proposed 2018 General Use Permit, new development would be required to include on-site drainage plans designed to retain, capture and convey increased runoff in accordance with the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) design standards and the Municipal Regional Separate Storm Sewer System (MS4) National Pollutant Discharge Elimination System (NPDES) permit requirements that include Provision C.3 site control features. These requirements generally require the use of Low Impact Development (LID) features such as vegetated swales, permeable paving, use of landscaping for infiltration, and other measures that would retain runoff as much as possible and allow for onsite infiltration. As a result, new development associated with the Project would be required to minimize the amount of stormwater discharge offsite. Stanford's on-site detention facilities also encourage groundwater recharge.
- In addition, as discussed in Impact 5.9-4, as a condition of the 2000 General Use Permit, Stanford implemented a campus-wide plan for groundwater recharge to mitigate the loss of recharge areas from development that occurs within the Unconfined Zone. As identified in Mitigation Measure 5.9-4 continued implementation of this groundwater recharge plan with annual reporting to the County would ensure that future development that would occur in the Unconfined Zone under the 2018 General Use Permit would not result in adverse effects to underlying groundwater levels.
- I-Smedberg-3 As discussed in Section 5.9 Hydrology and Water Quality, Stanford developed a Water Conservation, Reuse and Recycling Master Plan in 2001, and is currently developing a Sustainable Water Management Plan to guide its long-term water supply development, water conservation, wastewater and storm-water management, and habitat conservation programs.
- During drought periods, Stanford has modified irrigation practices to avoid waste and cut back on watering of non-functional turf areas.
- I-Smedberg-4 No changes to the existing Academic Growth Boundary (AGB) location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit.

Comment Letter I-Smith

From: [ANDREA B SMITH](#)
To: [Rader, David](#)
Subject: Stanford University
Date: Saturday, February 3, 2018 12:59:23 PM

Hello David Rader -

I am writing to express my dissatisfaction over Stanford's aggressive growth plan.

Palo Alto was never meant to be a city, however, Stanford is trying to make it such.

I 1

With all the increased new square footage for academic, housing, childcare, parking facilities, new employees (10-12k) the gross rate for traffic would be even more congested than already exist

I 2

Stanford does not take care of educating the children expected to be added to PAUSD, policing, fire, and infrastructure; Palo Alto has been deemed to do that.

I 3

Please vote against this aggressive growth.

Andrea Smith

[REDACTED]

Palo Alto

5.2.3.158 Responses to Comments from Andrea Smith

- I-Smith-1 This opinion does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Smith-2 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.
- I-Smith-3 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, Draft EIR Section 5.13, Public Services, Section 5.15 Transportation and Traffic, and Section 5.16 Utilities and Service Systems addresses all Project and contribution to cumulative public schools, police and fire protection, and traffic impacts associated with the construction and operation of the proposed Project, and identifies mitigation that reduces significant impacts to the extent feasible.

Ron Snow

Menlo Park, CA 94025



Friday, February 2, 2018

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

RE: Stanford 2018 Draft General Use Permit

Dear: Mr. Rader and Santa Clara Planning Department

After reviewing the Stanford GUP DEIA documents, attending several of the public discussions on GUP, researching the various aspects of impact, and discussing with neighbors, I request that Santa Clara deny the General Use Permit and instead require Stanford to seek individual permits for each project they propose.

I think it is commendable that Stanford is sharing their long range planning and have put effort into the identification of the many issues that such a large expansion incurs; however, I feel much of their impact analysis is flawed and lacks the thoroughness and details relating to the impact on the surrounding communities, roadways, and infrastructure.

1

Increased Traffic - Lack of effective mitigation:

For example, much effort was put into the DEIR mitigation of traffic that is based on the misguided objective to “increase maximum road capacity” and to “increase capacity” of these limited roadways (Alpine, Sand Hill, Page Mill, University, Marsh, Willow, Embarcadero, El Camino Real, etc).

Yet a goal to increase traffic capacity and increase traffic overall is not the goal of the community that I live in. We feel the roads are already at capacity and the safety of our community has suffered. Our standard of living has already been negatively impacted by the noise, pollution, and sheer amount of traffic and all of the safety and issues that traffic volume represents.

2

I could not find mitigation in the DEIR that would actually reduce traffic volumes, nor did I see that as a goal. In comparing traffic solutions and mitigation proposed by Stanford to other high traffic points of interests like SFO airport and Disneyland, Stanford is severely lacking in ideas and solutions. These other sites have alternative transportation to greatly reduce the vehicle traffic to their sites. These include out of area parking garages that hold thousands of cars, automated transit systems to move people from the parking locations to various site locations and transportation hubs. They provide people easy and convenient access to various alternative transportation capabilities to access site locations, all without the need for individual cars.

3

It seems to me that Stanford has not introduced any ideas or plans that would reduce traffic or provide new east-west transit systems that would significantly address the projected demands on the community roads. Nor has Stanford identified a new means for carless travel to Stanford from 101 and 280 access points. We are well into the 21st century and we have a 17 year plan from Stanford rooted in the 20th.

Lack of Analysis that includes other Development:

Stanford has major projects that are not included in the GUP as they exclude the compounded impact analysis of their other major developments by their other commercial, research, medical, and non-academic projects. Yet these other projects are also adding thousands upon thousands of new trips on our community roadways. This means thousands of additional visitors, clients, and employees coming to the campus and nearby communities for those Stanford interests. Additionally there is the further impact of the related peripheral business growth and community support infrastructure that results from that expanded growth and housing demands. These other interests alone (not including the GUP), are cause for concern. Our roadways, housing, and utility structure are already at critical points and these ‘outside’ GUP development projects will severely impact our community.

4

The GUP does not provide a true picture of impact when they ignore the other Stanford development in the local area and exclude the major development by 3rd parties in response to Stanford expansion (Hotels, new Commercial buildings, expanded medical and research facilities).

Again this is why providing a permit to this 17 year plan that does not include the the global overall impact of 17 years of other development is a major problem and should not be permitted. While a master plan is good to have, the permitting process needs to be on a project by project basis in order to address the then point in time environment and conditions that that project will have on the local communities.

Problem with Stanford putting weight on No New Net Commute Trips:

For the GUP and for any project proposed by Stanford, there should be prerequisite requirements to demonstrate effective mitigation. While Stanford promotes their no new net commute trips as a plus, I think Disneyland could also toot a similar horn. Disneyland has reduced the car traffic at their theme park significantly over the years with the virtual elimination of vehicles that drive onto the park and stay for more than 15 minutes. They have built outside area parking facilities, they have dedicated freeway off ramps to those parking areas. They claim that most people take shuttles, monorails, or walk to the theme park. But taking those statistics alone, that ‘no new net commute trips’ paradigm, is a very mickey mouse play against the true impact on the community.

5

For the local community around Disneyland it is a nightmare of traffic and congestion, of noise, and pollution. Fortunately Disneyland is not tooting a No Net Commute Trips horn and recognizes the severe and significant impact on the community.

Stanford needs to also recognize the impact on the local communities and roadways in a meaningful and effective manner. Stanford’s GUP should have done a far far better job in addressing the community impact, maybe with the same goal of no new net trips at a community level, and with the same enthusiasm as their limited inner campus context. If that were the case, we might have meaningful and effective solutions for the community and a more responsible plan for Stanford.

6

I recognize that a 17 year plan is complex and there are many unforeseen factors that need to be accounted for. I don’t think it is in the best interest of the local communities to provide a permit for such a plan that is complex and does not, can not, incorporate and address the issues that will exist in the near future.

Please deny the permit, thank Stanford for the master planning, but require each project to go through the permitting process at the point in time of the project.

Sincerely,


Ronald G. Snow

cc: San Mateo County Planning, Menlo Park City Council, local community

5.2.3.159 Responses to Comments from Ronald Snow

- I-Snow-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics. Please also see individual responses to comments that follow, below.
- I-Snow-2 The main driver for Stanford’s extensive Travel Demand Management (TDM) programs is to reduce vehicle trips. Please refer to Master Response 13: Transportation and Traffic, Topic 6, No Net New Commute Trips Standard for a discussion of the effectiveness of the no net new commute trips standard and the Project commitment to achieving the standard.
- I-Snow-3 Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.
- I-Snow-4 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.
- I-Snow-5 Stanford does not park people offsite and bus them to campus. The only off-site parking that Stanford uses for bus commuters is in the East Bay. Buses from the East Bay are removing regional trips from the road.
- I-Snow-6 The comment expresses personal opinions. The comment is noted, but does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Steinhart

Peter Steinhart

Palo Alto, CA 94301

November 16, 2017

Dept of Planning & Development

David Rader

County Government Center

70 West Hedding Street, San Jose, CA 95110

Dear Mr. Rader:

I submit the following comment on the Draft Environmental Impact Statement for the Stanford University 2018 General Use Permit.

I wish to suggest that measuring only peak hour commuter trips, two hours in the morning and two hours in the afternoon overlooks very considerable impacts this permit would have on Palo Alto, Menlo Park, Mountain View and East Palo Alto. The EIS estimates that under the terms of this permit, Stanford's resident population will grow by 6,326. That alone means the number of people driving to and from schools, grocery stores, restaurants, etc. in Palo Alto will grow by nearly 10% under the terms of this permit. The proposed development will add 8.4% growth in the number of households in Menlo Park, 3.5% in East Palo Alto, 3% of Menlo Park's and a large number of additional households in San Jose, and those numbers will have additional impacts on traffic and parking in the City of Palo Alto. The development envisioned by this permit is certain to put strains on roadways that are already heavily trafficked at other times of the day than the four peak hours being considered in this Environmental Impact Statement. Middlefield Road, University Avenue, Alma Street and Embarcadero Roads, for example, are already congested beyond the peak commute hours. A fair appraisal of the effects of the proposed developments should examine effects on traffic beyond those peak hours, and I urge that a revised Environmental Impact Statement do so.

Peter Steinhart

Peter Steinhart

OFFICE OF SANTA CLARA

2017 NOV 21 PM 2:22

5.2.3.160 Responses to Comments from Peter Steinhert

I-Steinhart-1 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 periods to represent the worst-case condition within the peak period, and includes all traffic in and out of the intersection, including those vehicles traveling 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 prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

Comment Letter I-Sterling

From: [Marcia Sterling](#)
To: [Rader, David](#); [Girard, Kirk](#); [Kumar, Kavitha](#); [Supervisor Simitian](#)
Subject: Stanford 2018 GUP EIR and Dish Parking
Date: Saturday, January 27, 2018 11:26:47 AM

Dear SC County Planners and Supervisor Simitian:

As you are working through Stanford's 2018 GUP, I hope you will keep in mind how important access to the foothills is to the residents of Santa Clara County and how much worse the Dish Parking situation will become after this proposed expansion. Your supervision of Stanford's right to build out the campus is the only leverage we citizens have to convince the university to act beyond its own self-interest and in the interest of the surrounding communities, which it impacts so profoundly.

Several years ago, Stanford justified its elimination of parking spaces on Stanford Avenue by claiming Coyote Hill parking (a 20-minute walk from the gate) would more than compensate. As anybody who uses this trail knows, there are never entrants to the Dish who come in from that direction, except a few bikers. Meanwhile, parking on nearby streets continues to close down. The last couple of remaining streets which permit overflow from Stanford Avenue are overly congested with Dish parkers and I expect they too will soon vote to close their street to non-Stanford parking. Stanford has moved the first available parking on Raimundo around the corner in the direction of Peter Coutts, making that limited space for overflow from Stanford Avenue unavailable.

I encourage you to act in the interest of Santa Clara County residents and ask Stanford to make addition parking available for Dish walkers and runners.

Thank you for considering this,

Marcia Kemp Sterling

mks@sonic.net

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5.2.3.161 Responses to Comments from Marcia Sterling

I-Sterling-1 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.

Comment Letter I-Struve

From: [Kirsten Struve](#)
To: [Rader, David](#)
Subject: Comments on CEQA Review of Stanford University GUP
Date: Thursday, February 1, 2018 7:32:41 PM

Dear Mr. Rader,

Thank you for the opportunity to comment on the CEQA review for Stanford's GUP. I am concerned about impacts on traffic and congestion, as well as impacts on housing and homelessness. Stanford is planning to add significant non-residential spaces, which will require workers to operate and maintain. Given that the existing rail service is near capacity, Stanford's plan should include paying a share of needed improvements, including grade separation. In addition, the credit system to ensure no increased trips is not clear in the EIR. Detailed trip credit information and its impacts on surrounding corridors should be readily available to interested parties.

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On the issue of homelessness, news reports indicate that many of the residents of campers parked along El Camino Real work at Stanford facilities. The EIR should analyze the impacts of additional workers who may not be able to afford housing in the Bay Area. Stanford should include a plan to provide housing that its workers can afford, or at a minimum enable employees using campers to park on a designated parking lot that includes vital services such as bathrooms, laundry facilities, and garbage collection.

4

Thank you very much for considering these comments.

Kirsten Struve


Palo Alto

5.2.3.162 Responses to Comments from Kirsten Struve

- I-Struve-1 A general statement is made about traffic and congestion, and housing and homelessness. Please see responses to individual comments related to these issues, below.
- I-Struve-2 The City of Palo Alto is studying multiple scenarios related to grade separation and is not expected to have a preferred scenario until early-2019, which would then trigger a need to commence environmental review in 2019. Pursuant to CEQA Guidelines Section 15127.4 (D)(3), mitigation measures are not required for effects which are not found to be significant. If Stanford achieves the no net new commute trips standard, the proposed Project would not increase peak hour, peak direction vehicle trips. If Stanford does not achieve the no net new commute trips standard, the Santa Clara County Planning Office would fund one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area.
- I-Struve-3 Please see Response to Comment I-Schmidt-6.
- I-Struve-4 Please see Master Response 6: Affordable Housing. On June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

Comment Letter I-Thompson

From: [Gail Thompson](#)
To: [Rader, David](#)
Subject: Stanford 2018 GUP Comment
Date: Thursday, February 1, 2018 2:29:55 PM

I am a long-time resident of Palo alto and I attended both of the meetings in Palo Alto regarding the GUP and share my fellow citizens concerns about increased traffic, housing, an need for an additional school/schools, funding sources, train crossings and the environment. I won't elaborate about the traffic and housing as much has been stated about this.

1

Stanford has enriched our community and is a global educational resource. I would like Stanford to be a model of good use of renewable resources including the use of renewable energy sources such as solar and wind sources. Also I would like to see electric vehicle chargers installed at the housing sites. I recommend bike parking garages such as those in Amsterdam. I have concerned about the health effects of continue use of fossil fuels in internal combustion engines and have had to go indoors because of grid locked traffic emitting pollutants. I believe a thorough study needs to be done regarding modes of transportation currently being used by those working and living on the Stanford campus.

2

I believe bigger doesn't necessarily mean better and would like a maximum boundary plan that includes no future development in the Stanford foothills. The proposed expansion affects the Bay Area, not just Palo Alto and Menlo Park, which border Stanford.

3

Sincerely,
Gail Thompson
Palo Alto resident

5.2.3.163 Responses to Comments from Gail Thompson

- I-Thompson-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- I-Thompson-2 The comment is noted, but does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Thompson-3 No changes to the existing AGB location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit.

Comment Letter I-Toor

From: [John Toor](#)
To: [Rader, David](#)
Subject: Stanford General Use Permit DEIR
Date: Tuesday, October 31, 2017 10:16:26 AM

I'm writing to express my desire that the Stanford EIR be as thorough as possible, with clear details and mitigations on traffic, congestion, and quality-of-life impacts.

The quantity of increased development that they are proposing is staggering to me, especially coming on the heels of their current expansion of the medical school corridor. I cannot imagine it can be dismissed with the sort of "no new trips" hand-waving that Stanford has advocated thus far.

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—John Toor

5.2.3.164 Responses to Comments from John Toor

I-Toor-1 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics. Please note also that quality of life issues are not within the scope of this Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-TovoMa

Full Name / Nombre Completo: MARION TAO Date / Fecha: 1/28/18

Email Address (optional) / Correo Electrónico (opcional):
[REDACTED]

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

East Palo Alto

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

My thoughts of ~~the new~~ ^{the new} development of Stanford campus is against it, because people now are having trouble with finding ~~or~~ housing already today. And if they were to build more buildings & Academic buildings, where are all these students going to stay if we don't already have issues with housing. They need to find a solution for the problem now, then to jumping into a new development that will add more problems. Thank you.

1

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☐ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuándo determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
- ☐ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
- ☐ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☐ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

5.2.3.165 Responses to Comments from Marian Tovo

- I-TovoMa-1 Due to the lack of specificity, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- I-TovoMa-2 Please refer to Response to Comment O-SCOPE-15.
- I-TovoMa-3 Please refer to Response to Comment O-SCOPE-10.
- I-TovoMa-4 Please refer to Response to Comment O-SCOPE-3.
- I-TovoMa-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. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and on September 25, 2018 adopted of an impact fee (of \$68.50 effective July 1, 2020) for any Stanford academic development.⁴² On September 25, 2018, the County Board of Supervisors voted to increase the affordable housing fee within the Stanford Community Plan area to \$68.50 per square foot effective July 1, 2020.
- Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- I-TovoMa-6 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

⁴² Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Comment Letter I-TovoMe

Full Name / Nombre Completo: MELE TOVO Date / Fecha: 1/28/18

Email Address (optional) / Correo Electrónico (opcional):

MELEMETOA @ GMAIL.COM

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

N/A #TEAMLISA

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

My concern would be bringing much more traffic into my community East of Menlo Park. We are already struggling to commute since the arrival of Facebook & Amazon. IF the DEVELOPMENT DOES PASS & APPROVE THERE shall be more housing NEAR IT where workers can live & not have to drive around the congestive traffic here in our community. ALSO it should at least aim to hire & contract more people from our community. Pay a wage to assist families that are under privileged treat them equally as you would software developers. As they say Custodian & the CEO shall both be respected the same. Equal benefits & perks!!

5.2.3.166 Responses to Comments from Mele Tovo

I-TovoMe-1 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

I-TovoMe-2 The personal opinion expressed is noted, but does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Villarreal

Full Name / Nombre Completo: Jesús Villarreal Date / Fecha: 28-01-2018

Email Address (optional) / Correo Electrónico (opcional):
[REDACTED]

Groups or Communities I am a Member of / Grupos o Comunidades de las que soy miembro:

ARVIS

Comments on the Stanford GUP DEIR / Comentarios sobre el informe ambiental para la solicitud de Stanford:

Las corporaciones
tienen que dar
el dinero a las
viviendas.

1

I-Villarreal

Spanish to English translation of letter:

The corporations need to give money for housing.

In addition, we as members of the group SCoPE 2035 have analyzed the reports prepared by the County and have found several errors and questionable assumptions. If you would like, you can indicate here if you would like to add these points to your comments.

Además, como miembros del grupo SCoPE 2035 hemos analizado los informes preparados por el Condado y hemos encontrado algunos errores y suposiciones cuestionables. Si lo desea, puede indicar aquí si desea añadir estos puntos a sus comentarios.

- ☒ The County miscounts the number of students and workers when determining the future greenhouse gas impacts of the university. The service population should be 44,398, rather than 68,781. With this, Stanford's development will exceed state climate targets.
El Condado presenta una cifra incorrecta para el número de estudiantes y trabajadores cuando determina los impactos futuros de los gases de efecto invernadero causados por la universidad. Específicamente, la población de servicio debería ser 44,398, en lugar de 68,781. Con esto, el desarrollo propuesto excederá los objetivos del estado.
- ☒ The VMT transportation impact analysis counts both students and employed workers as "workers," which makes it seem like Stanford's employees travel much less than they actually do.
El análisis de los impactos del transporte cuenta ambos los estudiantes y los empleados en la categoría de trabajadores. Como resultado, esto hace parecer que los empleados de Stanford viajan menos que en realidad.
- ☒ Stanford continues to rely on a "linkage ratio" of housing to construction area of 605 housing units per 500,000 square feet. This number does not reflect actual housing needs of 1.3 jobs per housing units and should be updated.
Stanford continúa usar una proporción entre la vivienda y la construcción de 605 unidades de vivienda por cada 500,000 pies cuadrados de construcción. Esta cifra no refleja las necesidades reales de vivienda.
- ☒ The DEIR considers the \$20 per square foot of construction paid by Stanford as a significant contribution, despite the Nexus Study prepared by Palo Alto showing that the actual impact for office/medical/R&D development to be \$264 per square foot.
El informe considera que el cargo de \$20 por pie cuadrado de construcción pagado por Stanford es una contribución significativa, a pesar del informe preparado por Palo Alto que muestra un impacto real de \$264 por pie cuadrado para el tipo de construcción de Stanford.
- ☒ The County does not analyze the increased housing demand by housing type, as it is required to do. Local communities should fully know what housing impacts Stanford will have.
El Condado no analiza la demanda incrementada de vivienda separada por tipo de vivienda, como requerido por la ley. La gente debe conocer completamente los impactos de la vivienda propuestos por Stanford.

5.2.3.167 Responses to Comments from Jesus Villareal

I-Villarreal-1 This comment does not address the adequacy of the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

I-Villarreal-2 Please refer to Response to Comment O-SCOPE-15.

I-Villarreal-3 Please refer to Response to Comment O-SCOPE-10.

I-Villarreal-4 Please refer to Response to Comment O-SCOPE-3.

I-Villarreal-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. 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 also note the County published an Affordable Housing Fee Nexus Study on April 5, 2018 to analyze the appropriate fee to be imposed and on September 25, 2018 adopted of an impact fee (of \$68.50 effective July 1, 2020) for any Stanford academic development.⁴³

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

I-Villarreal-6 The projected housing demand is described in detail in this Program EIR (see pages 5.12-17 through 5.12-21 of the Draft EIR) to allow indirect physical impacts of meeting housing demand to be adequately disclosed. To the extent the comment may relate to affordable housing, impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

⁴³ Available at <https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Pages/Nexus-Study-Documents.aspx>.

Thomas C. Vlasic

Palo Alto, California 94306

November 8, 2017

MEMORANDUM

To : Santa Clara County Planning Office (*Transmitted by e-mail*)
Atten: Kirk Girard, Planning Director
David Rader, Senior Planner
Kavitha Kumar, Senior Planner

From : Tom Vlasic, Member Stanford CRG, Southgate Resident, Palo Alto

Subject : Comments on Stanford 2018 GUP Proposal Draft EIR (DEIR)

First, I want to apologize for not being able to attend the November 16, 2017 CRG meeting. I tried to keep the rescheduled date open, but was unable to do so and have to travel out of the state. Thus, I've prepared the following comments that I wanted County CRG staff to have for the 11/16 meeting, hopefully to share with other committee members. Also, herewith, I'm transmitting my comments to Mr. Rader as formal input on subject DEIR.

1. **Holding Capacity/maximum University build out.** At the October 19th Palo Alto public meeting on the DEIR, Supervisor Simitian outlined the history of the adopted 2000 GUP provisions requiring preparation of a holding capacity analysis intended to set the maximum build out limits for the Stanford lands governed by the GUP, with particular attention to the foothills. As Mr. Simitian explained, this was not specifically accomplished and he advised that he would push for this requirement to be fulfilled as a condition of any action on the 2018 GUP application. Setting the holding capacity limits and the key parameters for such limits is essential to coming to grips with a number of the key development proposals in the subject GUP application.

I believe that Stanford should prepare a holding capacity analysis that can be fully evaluated in the final EIR and this analysis needs to define and set the limits for acceptable holding capacity and maximum campus build out. It should be more than a "planning exercise" as the 2008 "*Sustainable Development Study*" was labeled by Stanford. Without this base, campus growth is essentially unrestricted. Further, there needs to be a clear definition of holding capacity by campus area so that, in particular, provisions for protection of the foothills open space can be crafted and implemented. Without an acceptable analysis and holding capacity base, the County will need to consider other actions to ensure that specific, now undeveloped sensitive areas, like the foothills are protected. This could include, for example, open space/conservation easements granted to the benefit of the County or another appropriate public agency.

To be clear, I wish I had understood the background on this matter as explained by Mr. Simitian at the 10/19 meeting earlier, as I would have raised the issue during the DEIR scoping process.

2. **Traffic/Transportation.** While I acknowledge that the DEIR analysis is comprehensive and extensive, it is also difficult to wade through and determine the specific actions that will be implemented to ensure the *No Net Commute Trips* goal is actually being achieved, or any

other specific information on areas of concern. The **first** comment is that the final EIR must include a detailed table of contents for at least the traffic and transportation section to help the reader find what they are searching for. As is currently structured, it is a fishing process and a particularly frustrating experience if you do this on line.

2
cont.

Second, the questions raised in my Southgate neighborhood's February 16, 2017 letter submitted during the scoping process and included in the public comments received section of the County web site, are still valid and not specifically addressed in the DEIR analysis. The approach relative to mitigations appears to still focus on counting of trips in the cordon area and trip credits. Further, remedies for exceeding significance thresholds continue to rely on after-the-fact dollar contributions to the County for intersection improvements and/or other transit related improvements to be made at the discretion of the County. As others have argued, based on review of the comments received, there should be an approach implemented to halt pursuit of growth under the GUP if significance thresholds are crossed. This should remain in place until the impacts have been remedied to less than significant levels. Further, any mitigation measure dollar expenditures for remedies should include involvement of the specific jurisdiction(s) involved, particularly Palo Alto, and this should be clearly stated, not just implied, in the mitigation measures.

3

3. **Foothills open space protection guarantees.** While the current proposals, as well as the adopted Stanford Community plan, call for only open space and field research uses in the foothills areas, they, as well as the Sustainable Development Study, keep the options open for a general plan amendment to permit more intense uses in the foothills like those permitted within the academic growth area, albeit with certain limitations. These provisions need to be revisited based on the holding capacity analysis discussed above and a determination made as to what changes are needed to ensure that the more intense development desired by Stanford is offset by permanent provisions for protection of the open space character of the foothills. At this point, the protection of the foothills, which are critical open space resources for the County and the entire Region, is left open to the future wishes of the University and decision-makers. If the academic core is to grow as the University now desires, there needs to be provisions for ensuring that foothills open space is protected in perpetuity to off set the now proposed growth and implied desired flexibility for consideration of future growth beyond 2035.

4

4. **Visual Impacts within the El Camino Real Corridor.** The DEIR relies on the 2007 approved *Plan for El Camino Real Frontage* to reach a conclusion that any potential visual impacts along the frontage are less than significant. This is an inadequate analysis and conclusion relative to the proposed 200,000 sf of new growth proposed for the DAPER Administrative Zone and the significant growth requested for Quarry North. The Frontage plan only requires a 20 foot building setback from the street frontage and a 50 foot height limit. This is not adequate to protect the historic visual resources that exist along Stanford's El Camino Real frontage. The close-in views as well as the long distance views across the campus from critical points along El Camino would be lost and these are what help to make Stanford growth and development at least partially acceptable to its neighbors. The open views also are unique resources along El Camino in the County and beyond and need to be so recognized and protected. Some photos follow that show critical views, particularly across the play fields, that need to be protected with more land use restrictions than what is set forth in the 2007 plan or analyzed in the DEIR. While it is recognized that in the 2007 plan, Stanford says it will go through a more specific process for review and approval of any land use proposal for the play fields along El Camino, experience has shown that this is a "fine tuning" process of Stanford's proposal and not any guarantee that the critical, and historic, open spaces and associated view vistas will in fact be protected.

5

Views 1&2. From Churchill-El Camino Intersection to fields, Hoover Tower and foothills.



View 3. From Play frontage to fields, stadium and foothills.



View 4. View across fields to tree backdrop and foothills.



View 5. *View From Town & Country Village to Arboretum.*



View 6. View of Oak Grove, Stadium Frontage.



The 2007 El Camino Real frontage plan and its analyses attempt to evaluate the character of the Stanford frontage, and set standards for it, based on the existing conditions and zone provisions for the Palo Alto side of El Camino. This is a flawed approach as the ownership patterns and historic uses are far different than on the Stanford side. The Palo Alto parcels are much smaller, have numerous owners and represent a far different pattern of use. Often these uses have been reflective of and supportive to Stanford, including public schools, residential neighborhoods and commercial uses providing services to Stanford and the greater Palo Alto community.

Stanford has the ability to adjust its uses to protect the open space resources and should do so when seeking the type of growth now proposed. The historic visual conditions along El Camino are special, set the unique visual character for the area, and need to be far better recognized and protected than what is now provided for in the 2007 plan, especially in light of the proposed growth in the DAPER and Administrative and Quarry North areas. As an overall visual impact mitigation, at a minimum, the *Campus Open Space* designation should be extended south from the Stadium frontage at least to the East Campus Area and should include the play fields visible from El Camino Real.

5. **Off Campus Parking impacts.** The DEIR does a creditable job in evaluating the overall parking, including off campus parking, impacts. For now the conclusions appear generally acceptable. However, special event parking, particularly the well attended football games and non-Stanford events like major league soccer at the Stadium, all mostly on weekends and evenings when the RPP programs are not in effect, will continue to impact parking in adjacent neighborhoods. This is the case even with the game day temporary barricades that are used. As a neighbor, I see this as an acceptable situation given the overall campus benefits to the community. However, if the non-Stanford use of the Stadium increases in a significant way, where regularly adjacent neighborhoods are impacted by parking of non-University uses, limits on such uses should be considered. I was not able to identify any current or proposed limits on such outside uses, and may have just missed them, but this is something County staff and officials may want to review and be clear on as final action on the EIR and GUP are considered.

Also, as an observation, the RPP programs in Palo Alto will likely increase. The intrusive parking problems are being shifted to other neighborhoods where RPP programs are not in place. This will result in more RPP requests and likely approvals. Ultimately, there will likely be a very significant parking problem in the community as Stanford affiliates and other heavy parking demand use employees seek parking spaces.

Summary

As discussed above, I do have concerns with the GUP proposal and the DEIR, and I know that the City of Palo Alto, other jurisdictions, and the neighboring public interests will also have concerns, particularly with the traffic and development intensity. At the same time, I commend Stanford for its efforts to minimize the impacts of its recent growth and future proposals. The University has likely done more in traffic management and overall sustainable development than any other private entity or institution in the Bay Area. Further, it provides numerous and "priceless" tangible and intangible benefits to the local and greater community that significantly enhance the quality of life. Nonetheless, we all can do better to protect that quality and there is still room for Stanford to refine its plans and proposals to that end.

Comment Letter I-Vlasic

As a CRG member and neighbor to the University I appreciate the opportunity to review the GUP proposal and DEIR and offer the above comments on them.

T. Vlasic

cc. Joe Simitian, Santa Clara County Supervisor
Southgate Neighborhood Committee
Palo Alto City Council

5.2.3.168 Responses to Comments from Thomas Vlastic

- I-Vlastic-1 Regarding the comment about a holding capacity and maximum buildout, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-Vlastic-2 The Draft EIR Transportation Section, while comparatively longer than other technical sections, is generally in a consistent format as the other Draft EIR technical sections. The Transportation and Traffic subsections includes an Introduction (5.15.1), Existing Environmental Setting (5.15.2), 2018 Baseline Environmental Setting (5.15.3), and Regulatory Setting (5.15.4). The Impacts and Mitigation Measures (Other than VMT) subsection (5.15.5) includes subsections for Significance Criteria, Approach to Analysis, and Impact Evaluation. Three additional subsections provide additional information on Vehicle Miles Traveled Impacts (5.15.6), Transit and Bicycle Facility Capacity (5.15.7), and On-Campus Parking Supply and Off-Campus Parking Restrictions (5.15.8). Lastly, the References are included (5.15.9). The on-line version of the Draft EIR on the County website⁴⁴ is easily searchable for information.
- I-Vlastic-3 If the no net new commute trips standard is achieved through Stanford’s transportation demand management programs and off-campus vehicle trip reduction credits, then no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.
- I-Vlastic-4 Please refer to 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.
- I-Vlastic-5 On page 5.1-13, the Draft EIR recognizes: “Development on the existing athletic fields or the open area known as Masters Grove would diminish the relatively open quality of this district, and would be especially noticeable from off-site public vantage points if buildings are constructed in the fields adjacent to or nearby El Camino Real.” However, the fact that a view will change does not mean the impact to visual resources is significant. Views of the Stanford frontage are not protected under any adopted County policy. The Stanford Community Plan designates the Campus Open Space areas in which new structures cannot be

⁴⁴ Located here: https://www.sccgov.org/sites/dpd/programs/stanford/pages/gup2018_ceqa.aspx.

constructed. As a matter of policy, the other areas of the campus are available for development. The El Camino Real Frontage Plan recognizes this by describing setbacks and height limits for the portions of the campus that are within 100 feet of El Camino Real. Please see Response to Comment A-PA-19 for additional information regarding the visual quality and character of land within the DAPER and Administrative Development District.

I-Vlasic-6 Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions for a discussion of on-site parking and Stanford affiliates parking off-campus.

Stanford has no plans to expand its athletic and cultural facilities in a manner that would substantially change the number of visitors to the campus. As noted on Draft EIR Appendix VMT page 44, for athletic and cultural (performances) events, no growth was anticipated for the 2018 Stanford General Use Permit because these programs and their venues already exist on the campus and are not expected to expand. Further, parking is free in the evenings and weekends when events take place, and there is signage to direct visitors to ample parking. Only football and basketball games charge for parking on-campus. As such, increased parking in the neighborhood due to events at Stanford is not expected to occur.

I-Vlasic-7 Please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Voreck1

From: [Voreck, Rick](#)
To: [Rader, David](#)
Subject: Comments on Stanford GUP 2018 DEIR
Date: Thursday, February 1, 2018 10:46:16 AM

Hi Dave

I am a former student and pleased and proud of all the education, research, amenities, and considerations that Stanford provides to the community.

However, I live at [REDACTED], at the intersection of Piers Lane, ~ ¼ mile north of I280. I live on a major artery supporting Stanford commute traffic.

I see all the traffic going in and out of Stanford every day as I try to get on and off Alpine Rd. Most mornings, North bound traffic to Stanford is gridlocked all the way from Piers Lane to Junipero Serra Blvd, about 1.5 miles away.

The Alpine Rd traffic is already very intense. I cannot imagine how adding millions of square feet of additional space to Stanford would not make this situation worse.

The “No New Net Commute Trips” expansion criteria is a nice idea, unfortunately, it does not include construction traffic, Stanford hospital traffic, and failing to meet that criteria simply means that Stanford is obliged to expand the roads and intersections.

We have proven over and over that expanding road capacity instead of clearing up traffic congestion simply brings more traffic, and then we have larger congested roads.

The increasing draw of perpetually expanding Stanford facilities creates the perpetually expanding traffic demand.

We need to have Stanford declare a maximum buildout limit. Otherwise this cycle continues until all area roads are continuously gridlocked at all times.

Thanks,
Rick Voreck

[REDACTED]
Portola Valley, CA

This message (including any attachments) may contain confidential information intended for a specific individual and purpose. If you are not the intended recipient, you should delete this message and any attachments.

5.2.3.169 Responses to Comments from Rick Voreck

I-Voreck1-1 Existing traffic congestion on Alpine Road is noted. As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard, and Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

I-Voreck1-2 The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual 2018 General Use Permit projects.

The 2018 General Use Permit EIR is a program-level evaluation, and does not specifically consider individual projects. As such, construction impacts are addressed at a programmatic level. Project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at the time they are proposed to determine whether the environmental effects of the specific project were adequately disclosed in the 2018 General Use Permit Program EIR. Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

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 for detail on why off-campus Stanford land uses and affiliates like the Stanford University Medical Center (SUMC) are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).

I-Voreck1-3 The comment is noted but does not address the adequacy of the Draft EIR.

I-Voreck1-4 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.



County of Santa Clara
Department of Planning and Development

Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **December 4, 2017.***

Name: RICK VORECK

Organization (if any): _____

Address (optional): _____

City, State, Zip: PORRATA VLY, CA 94028

E-mail: _____

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

THE NUMBER OF ISSUES RAISED IN THIS AND
OTHER MEETINGS (TRAFFIC, HOUSING, ENVIRONMENT, ETC)
CLEARLY INDICATE THAT THE EVALUATION TIME
FOR THE DEIR/GUP MUST BE EXTENDED!
TRAFFIC IN THE AREA IS DIFFICULT NOW,
EXPANDING THE CAMPUS WILL ONLY MAKE TRAFFIC
IMPOSSIBLE. STANFORD NEEDS TO AGREE TO
A MAXIMUM BUILDOUT LIMIT. OPEN SPACE NEEDS
TO BE PERMANENTLY PROTECTED.

(More space on reverse side)

5.2.3.170 Responses to Comments from Rick Voreck

I-Voreck2-1 The County elected to extend the public comment period on the Draft EIR to February 2, 2018.

I-Voreck2-2 With respect to a maximum buildout, please refer to 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.

With respect to a permanent protection of the open space, no changes to the existing Academic Growth Boundary (AGB) location, the established duration of existence of the AGB, or existing policies protecting open space lands outside the AGB, are proposed under the 2018 General Use Permit. Changes to existing policies may be considered by the County Board of Supervisors as part of consideration of the 2018 General Use Permit. Please see Master Response 5, Project Description, Topic 2: Scope of Proposed Project and Analysis.

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
Phone: (408) 299-5779
Email: David.Rader@pln.sccgov.org

Re: Stanford 2018 General Use Permit Application and Draft EIR

Santa Clara County Board of Supervisors has a Solomon-like task in deciding how to balance the needs of the communities surrounding Stanford University and the needs of the University itself as stated in the GUP and Draft EIR.

From attending many meetings on this subject, several points of the GUP and draft EIR require highlighting:

- Stanford, in all its endeavors, is greatly appreciated and admired. I'm not aware of a single person who has spoken ill of its contributions to the region or the excellence of its services. 1
- This is the single largest project ever proposed in Santa Clara County. It is critical to the County that the Board of Supervisors not be overwhelmed in scrutinizing it or accept any information provided by Stanford without extremely careful analysis, such as the submitted low job creation multiplier and the equally conservative student generation rate. Also, it would not be at all inappropriate to set measurable milestones for each part of the GUP buildout, measure results on key indicators, such as traffic, housing, school age student increases, etc., and make adjustments as needed to keep the GUP within the Board's approved parameters. 2
- The GUP presents only part of Stanford's ongoing expansion plans, namely less than 50% of the 5.7 million square feet of new non-residential square footage presented in four segmented Stanford developments across multiple permitting jurisdictions. As such, We respectfully request the Board look at all of Stanford's expansion plans, no matter under whose jurisdiction, including the requirement for a Stanford maximum build out plan, as well as other non-Stanford development plans announced from July 2017 – February 2018 to gain a more comprehensive understanding of the pressures – transportation, housing, school age student increases, water, etc. – confronting this area. 3
- While the GUP talks of the projected increase of 9600 employees or students, it is unrealistic to assume that a certain number of these employees or students will not be 4

accompanied by some number of family members. Given the demographics of the new employees and graduate students, there is an appropriate multiplier to use in arriving at a more accurate projected population increase. In addition, the County also needs to add the extra jobs from the job multiplier number as well as their likely family members. Only then can the County begin to assess the total impact of the GUP population increase.	↑ 4 cont.
Traffic and congestion will increase without significant changes to the proposed GUP and traffic mitigation plans as discussed by Stanford. Each begs the credibility of those who presented and/or believe the stated traffic impacts and continued reliance on the current traffic demand management system. Caltrain cannot reasonably be expected to mitigate Stanford's increased commuter traffic.	5
The GUP housing plans do not address the housing shortage, or workforce housing, from the influx of 9600 employees or students, employees from the job multiplier number, plus family members. It should be required to do so.	6
Stanford's offset contributions to the Affordable Housing Fund go to Santa Clara County for distribution, further exacerbating the affordable housing crisis in municipalities bordering Stanford. 100% of these funds should go to these adjacent communities.	7
Impacts from school aged children are understated in the GUP with the likely outcome of further burdening neighbor municipalities, which will have to shoulder these education costs. Stanford should be required to provide adequate additional on campus school facilities to educate the anticipated number of such students based on the more realistic student generation rate of 0.98 and have such facilities in place prior to their being needed.	8
Stanford should be required to fund mitigation strategies to offset the impacts of the GUP, including but not limited to housing, education, traffic, infrastructure and separated grade crossings. Such mitigation funding should be reviewed with additional funding assessed, as needed, as the GUP is built out and mitigations required. This avoids the issue of insufficient mitigation funding being available when the mitigation is implemented as such costs usually increase over time.	9
Stanford as a non-profit is tax exempt. Given the cost burdens placed on the County and nearby municipalities as a result of this and previous GUPs, we encourage the Board to facilitate a conversation with Stanford and neighboring municipalities to explore and negotiate a Payment In Lieu of Taxes (PILOT) to be paid annually to such municipalities. PILOTs have been successfully negotiated with other major universities, including Harvard, and would recognize Stanford's financial impact on local taxpayers.	10

Lastly, as you do your due diligence on the Stanford 2018 General Use Permit Application and Draft EIR, no matter where you live in Santa Clara County, please view yourself as a resident and taxpayer who lives in Palo Alto, Los Altos, or any of the other neighboring communities, including those in San Mateo County, particularly East Palo Alto and Menlo Park. Do not think of yourself as living in San Jose or Santa Clara. Only by putting yourself in our shoes can you hope to understand our concerns.

11

Thank you for receiving our comments.

Sincerely,

Rita C. Vrhel

Palo Alto, CA 94301

Rene C. Wood

Sheffield, MA 01257

cc: Joe Simitian; President, Santa Clara County Board of Supervisors
Palo Alto City Council

5.2.3.171 Responses to Comments from Rita Vrhel and Rene Wood

I-Vrhel-1 Please see Master Response 1: Non-CEQA Comments.

I-Vrhel-2 With respect to the comment about the job creation multiplier being low, please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Job Multiplier.

With respect to the comment about student generation rate being conservative, please see Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts.

With respect to the comment about setting milestones on key indicators, 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.

I-Vrhel-3 The comment refers to Stanford development that would occur under the proposed 2018 General Use Permit, and other non-Project off-campus Stanford development. 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, regarding how non-Project Stanford development was considered in the Draft EIR.

Regarding the comment requesting a requirement of a Stanford maximum buildout, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.

I-Vrhel-4 Table 5.12-9 on page 5.12-15 of the Draft EIR shows the total population growth among all Stanford affiliates in 2035. Undergraduates, graduate students, postdoctoral students, and faculty would comprise 4,650 of the total 2035 population of 9,610. Table 5.12-10 on the following page shows that 1,298 other family members would reside on-campus. The 2018 General Use Permit is also expected to result in demand for 2,425 off-site housing units.

Please note that on June 12, 2018 the County published the Recirculated Portions of Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

With respect to a job multiplier, please see Master Response 9: Population and Housing Methodology and Calculations, Topic 6: Job Multiplier.

I-Vrhel-5 As long as the no net new commute trips standard is achieved through Stanford's transportation demand management programs and off-campus vehicle trip reduction credits, no additional mitigation would be required to address traffic congestion. The no net new commute trips program is discussed in more detail in Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

I-Vrhel-6 Please see Response to Comment I-Vrhel-4, above.

I-Vrhel-7 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 see Master Response 9: Affordable Housing, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds.

I-Vrhel-8 With respect to the comments that impacts from school-aged children are understated; that Stanford should be required to provide additional on campus school facilities; that a student generation rate of 0.98 should be used; and that facilities should be in place prior to their being needed, please refer to Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts, and Topic 2: Additional School Site.

I-Vrhel-9 Due to the lack of specificity in the comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, the Draft EIR identifies feasible mitigation to mitigate all significant Project and cumulative impacts, to the extent feasible, including related to transportation and traffic (see Section 5.15, Transportation and Traffic, and Section 5.16, Utilities and Service Systems). See also Section 5.17 in the Recirculated Portions of Draft EIR that identified mitigation associated with indirect off-campus housing effects. As discussed in the Draft EIR, no significant Project or cumulative impacts are identified with impacts to public schools.

I-Vrhel-10 The comment addresses socioeconomic issues which are outside the scope of this EIR. Please refer Master Response 1: Non CEQA Comments.

I-Vrhel-11 The comment expresses opinions which do not address the adequacy of the Draft EIR. Please refer Master Response 1: Non CEQA Comments.

Comment Letter I-Wei

From: [kathy wei](#)
To: [Rader, David](#)
Subject: About GUP
Date: Friday, November 10, 2017 5:29:16 PM

Hi Mr. Rader,

I am a long time Palo Alto resident, and I am deeply concerned by the significant and negative environmental and community impact that will be caused by Stanford's General Use Permit (GUP).

1

Due to the rapid growth of high tech companies and the ensuing flood of new hires into the bay area, Palo Alto is already suffering unprecedented traffic congestions on all major roads and severe parking shortages. Stanford projects to grow by >9000 individuals, which is a 13.4% growth in population. How does the existing infrastructure support such a growth? Many of the most congested intersections simply have no feasible mitigation plans.

2

Stanford's new house are not close to schools, requiring parents to drive students during the peak hours on the already grid-locked streets. The projected total number of kids is >400, living relatively close to each other. We urge Stanford to consider support (land and funding) a new school to reduce the number of trips parents take during the peak hours.

3

The School Generation Rate Stanford used to calculate enrollment impact on schools is questionable. We suggest it should be higher than the number Stanford estimates (275 students). PAUSD should expect surges to enrollment, and not gradual growth, over years and across grades.

4

Stanford's rental properties are tax exempt which means there'll be no property tax from new rental properties, even though there'll be many more kids from the expansion effort attending PAUSD. Given that PAUSD is a basic aid district funded in large part by property taxes, whether Stanford chooses to lease or rent these new 550 units has long term financial impacts on the PAUSD budget.

5

These concerns are serious and have long term implications on Palo Alto. Stanford needs to address each of these with satisfactory and feasible mitigation plans, as well as provide sufficient funding. Their financial contribution must NOT be capped to work in their favor.

6

Sincerely,

Kathy wei

Sent from my iPhone

5.2.3.172 Responses to Comments from Kathy Wei

I-Wei-1	Please see Response to Comment I-Lu-1.
I-Wei-2	Please see Response to Comment I-Lu-2.
I-Wei-3	Please see Response to Comment I-Lu-3.
I-Wei-4	Please see Response to Comment I-Lu-4.
I-Wei-5	Please see Response to Comment I-Lu-5.
I-Wei-6	Please see Response to Comment I-Lu-6.

Comment Letter I-Welch

From: [Greg Welch](#)
To: [Rader, David](#)
Subject: Comments on the Stanford GUP
Date: Friday, February 2, 2018 2:06:24 PM

Dear Mr. Rader,

I am a resident of Crescent Park in Palo Alto and I am writing to voice my objections to the traffic impact assessments in the EIR of Stanford's 2018 General Use Permit proposal.

- 1) The current state of traffic in our neighborhood is already a health and safety issue. The country's approval of Stanford's Plan should be contingent upon a REDUCTION of traffic, not merely a promise of "no net new" traffic. 1
- 2) The claims in the EIR that Crescent Park will not experience any noticeable increase in traffic are highly suspect:
 - a) The data are suspect: Tire sensors were in place for only 2 days. We notice tremendous variability in the traffic patterns from day to day, so there is no way of knowing if such a small sample is remotely representative. 2
 - b) The assumptions are suspect: Stanford acknowledges that the relative traffic flow on University and Hamilton vary dramatically over the course of the day. Long-time residents will also tell you that much more traffic is "over-flowing" into Hamilton and other local streets from University than in the past. Yet the modelling assumption used by Stanford to calculate TIRE Index impact (Table 8-5 of the Transportation Impact Analysis Part 2) assumes that all traffic distributes between between University and Hamilton according to the daily distribution during 2-days of data collection, without taking into account the change in distribution during the afternoons seen in their own data samples, or looking at the longer-term shift in distribution that is taking place as the aggregate number of cars increases and the popularity of systems such as WAZE increases. 3
 - c) Poor data samples, plus flawed assumptions, results in highly suspect impact calculations. 4
- 3) The "no net new" traffic claims are suspicious without concrete changes to the GUP
 - a) If there is to be no net new traffic, there is no need for new parking structures. County approval should specifically prohibit the construction of parking structures/places on or near campus. 5
 - b) "Credits" should be finite in number and the "No net new" restriction should apply to all Stanford properties not merely the academic campus, with much more comprehensive measurements than simply at the entrance/exits of the campus proper. Failure to make these changes and stipulations creates a system wide open to being "gamed." 6
 - c) Claims that Caltrain capacity will significantly help Stanford achieve its "no net new" traffic ignore the facts that a) the theoretical capacity added through electrification has already been spoken for by other previously approved projects in the area, and b) the proposed expansion of Caltrain capacity is not funded 7
- 4) The Traffic Crisis Requires Stanford's contributions to a solution
 - a) the focus on "no net new" traffic distracts from size of the traffic that does flow in and out of Stanford every day. Stanford is not an island. It cannot survive without the communities that surround it. 8

Comment Letter I-Welch

b) Stanford is the area's largest landowner, developer, and one of its largest employers. And yet it pays no taxes to support the communities surrounding it. It pays nothing to support the schools where its employees children learn. It pays nothing to support Caltrain, It pays nothing to maintain the infrastructure its employees use to get to work every day. This has to stop.

9

c) Our communities are choking on traffic, our schools labor under ever thinner budgets, Stanford should commit to making positive contributions to these issues, rather than labor to pretend that what they do inside their campus doesn't impact the community that surrounds them.

10

c) The County should only support the Stanford Plan if Stanford commits to supporting the community

11

Greg Welch

[REDACTED]

Palo Alto CA 94301

5.2.3.173 Responses to Comments from Greg Welch

I-Welch-1 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments. Please see also individual responses to comments, below.

I-Welch-2 As described on page 5.15-13 of the Draft EIR, intersection turning movement counts were conducted primarily during October – November 2016. The counts collected for the neighborhood impact analysis were conducted over a 48-hour period on clear days with area schools in session (see Appendix N of Draft EIR Appendix TIA). As described in the Caltrans Traffic Manual, sample traffic counts for study purposes are taken usually over a day or less.⁴⁵ Here, the day of the week, time of day, weather conditions, and influence of schools are all consistent with standard traffic engineering practice and, therefore, the traffic counts collected for the Draft EIR are reasonably representative of typical existing traffic conditions. The TIRE methodology is described in detail in Section 3.5 of Draft EIR Appendix TIA and is the adopted methodology for residential traffic impact analysis in the City of Palo Alto.⁴⁶

I-Welch-3 There is no evidence that the travel routes selected with the assistance of trip-routing applications such as Waze differ from travel routes observed during the 48-hours of data collection that formed the basis for the Neighborhood Street Analysis presented in the Draft EIR. Waze was available to drivers during the data-collection period. The routes used by drivers during the data collection period are considered to be representative of the routes that drivers would use under future conditions.

The Draft EIR uses the TIRE methodology because most of the neighborhoods that would experience increases in traffic are located in the City of Palo Alto.⁴⁷ Palo Alto uses the TIRE methodology to quantitatively characterize the amount of traffic on a residential street and how residents perceive increases in traffic. It provides a numerical representation of residents' perceptions of the effect of traffic on residential activities like walking, cycling, playing, or driving a car in and out of a residential driveway. It is loosely based on research conducted by Professor Donald Appleyard of UC Berkeley in which residents were surveyed about how different traffic volumes affected their neighborhood activities. As such, it rates the traffic levels along residential streets from a resident's viewpoint rather than a driver's. The TIRE methodology was independently reviewed for application on the proposed Project and is recognized to be an appropriate methodology supported by substantial evidence.

⁴⁵ See <http://www.dot.ca.gov/trafficops/camutcd/docs/TMChapter2.pdf>.

⁴⁶ See <https://www.cityofpaloalto.org/civicax/filebank/documents/7360>.

⁴⁷ Ibid.

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

I-Welch-4 The traffic analysis prepared for the Draft EIR was prepared by a qualified traffic engineering firm, and peer reviewed by a second qualified traffic engineering firm independently retained by the County. As described in Section 5.15 of the Draft EIR, the methodologies used in the traffic impact analysis followed accepted traffic engineering practice described in Chapter 16 of the 2000 Highway Capacity Manual (HCM) (Transportation Research Board) and approved by the County of Santa Clara, the Valley Transportation Authority (VTA), and San Mateo County.

I-Welch-5 Please refer to Master Response 13: Transportation and Traffic, Topic 13: Parking Supply and Restrictions (On-Campus Supply).

I-Welch-6 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 for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).

The current and proposed modifications to the approved trip credits are 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.” A cap on trip credits would be a disincentive for Stanford to remove trips from the road, and could reduce programs that Stanford offers to other community members, such as the free, publicly accessible, Marguerite shuttle.

I-Welch-7 A Transit and Bicycle Capacity Analysis Addendum (included in Appendix TBC-ADD in this Response to Comments Document) provides an updated analysis based on the most recent capacity assumptions provided by the Caltrain Joint Powers Board (JPB). Please refer to Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity for discussion of the updated analyses conducted as a result of the JPB’s input.

I-Welch-8 A general comment is made about traffic. Due to the lack of specificity, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

- I-Welch-9 Tax issues are outside the scope of this Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Welch-10 To the extent the Project results in significant traffic impacts, mitigation is identified, and would include funding of fair share of transportation improvements.
- I-Welch-11 This comment does not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Wilson1

Susan Wilson

Palo Alto, CA 94306

February 1, 2018

Kirk Girard, Planning Director (kirk.girard@pln.sccgov.org)

David Rader, Senior Planner (david.rader@pln.sccgov.org)

Kavitha Kumar, Senior Planner (kavitha.kumar@pln.sccgov.org)

Joe Simitian, Supervisor (supervisor.simitian@bos.sccgov.org)

Re: Comments on Stanford's 2018 GUP Proposal

Dear County Planners and Supervisor Simitian:

"TRAFFIC" pretty much sums up the 2018 GUP Proposal for those of us who live anywhere near Stanford. Perhaps you have heard this before. We've had enough. Stanford limits their car count to commute hours; just what are the commute hours in the age of work 24/7? For those of us living near Stanford errand hours are now 10:45 to 3:00, but you know this because I assume you too have encountered the increase in traffic everyday, all day.

1

The other comment I would like to make concerns low income workers. By growing the University, Stanford is also moving the low income workers farther and farther from their workplace, thereby putting more cars on the road for longer periods of time. Please encourage Stanford to do the right thing and provide affordable housing for this group of people.

2

I think we have reached build-out: a state in which an area has been fully developed. I'm feeling strangled by an institution which prides itself on bettering the world. Maybe it's time they address the ill effects they're causing locally.

3

With the last GUP still in progress, we have yet to fully experience the traffic effects. We need your help for a return to sanity!

4

Thank you,

Susan Wilson

5.2.3.174 Responses to Comments from Susan Wilson

I-Wilson1-1 Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

I-Wilson1-2 Impacts of the Project on affordable housing is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

However, please note that on June 12, 2018 the County published the Recirculated Portions of the Draft EIR, which includes two 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 their consideration of whether more housing should be constructed.

I-Wilson1-3 Personal opinions are expressed that do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-Wilson1-4 Personal opinions are expressed that do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Wilson2

From: [Susan Wilson](#)
To: [Girard, Kirk](#); [Rader, David](#); [Kumar, Kavitha](#); [Supervisor Simitian](#); [sandy.sloan](#)
Subject: 2018 GUP
Date: Thursday, November 30, 2017 10:23:27 AM

Susan Wilson



Palo Alto, CA 94306

Kirk Girard, Planning Director
David Rader, Senior Planner
Kavitha Kumar, Senior Planner
Joe Simitian, Supervisor

November 30, 2017

Dear County Planners and Supervisor Simitian:

As the GUP for 2018 works its way through the system I would like to express my vote for rejecting it. How can you even think about an additional 3.5 million square feet expansion of the Stanford campus without first addressing the infrastructure needed to support such an increase in density? Perhaps you've noticed the traffic impact on Sand Hill Road, Page Mill, Stanford Ave and El Camino. The "commute hour" is now two 3-hour periods each day. The stop lights are longer, the bottlenecks grow and grow and grow. This is what you are supporting if you allow Stanford to build 3.5 million square feet as proposed under this new GUP.

1

We are a world of finite resources, especially true in the Bay Area. Where do you think the water will come from? An efficient Bay Area wide public transportation system needs to be in place. Low income housing (where dorm rooms do not count as low income) needs to happen before an expansion anything like the massion one Stanford is proposing can be put on the table.

2
3

We are choking. Take a stand with Stanford and stop the limitless expansion—3.5 million square feet is limitless in a fragile area of limited resources! Make Stanford responsible for the density it has already created.

4

Susan Wilson

5.2.3.175 Responses to Comments from Susan Wilson

- I-Wilson2-1 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.
- I-Wilson2-2 These comments do not specifically address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Wilson2-3 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments. Please also see Response to Comment I-Wilson1-2 regarding housing.
- I-Wilson2-4 These comments do not specifically address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-Winikoff

From: [David Winikoff](#)
To: [Rader, David](#)
Subject: Stanford GUP draft EIR: SAN MATEO COUNTY (Unincorporated West Menlo) IMPACTS MUST BE CONSIDERED
Date: Tuesday, November 14, 2017 1:41:38 PM

County of Santa Clara
Department of Planning and Development
Attention: David Rader
County Government Center
[70 West Hedding Street, San Jose, CA 95110](#)
Phone: [\(408\) 299-5779](#)

Dear Mr. Rader,

I am writing to you as a concerned resident of the area of West Menlo Park that falls under the jurisdiction of Unincorporated San Mateo County.

Upon review of the EIR for the 2018 Stanford GUP, it appears that while Santa Clara County, the City of Palo Alto and the City of Menlo Park are all considered key affected jurisdictions, San Mateo County has not been given the same level of importance. The planned growth at Stanford will have an extremely significant impact on the already terrible traffic along the Alpine/Santa Cruz/Alameda de las Pulgas Corridor of unincorporated Menlo Park not just during the single am and pm peak traffic hour which currently defines the No New Net Commute Trip standard. Traffic could worsen for 22 other hours of the day and no mitigation funds would be paid.

1

The No New Net Commute Trip standard disproportionately disadvantages residents of West Menlo Park.

1) It is unlikely that trip reductions will actually be occurring within West Menlo Park as there are no significant efforts demonstrated by Stanford to reduce traffic congestion along the Alpine/Santa Cruz/Alameda Corridor. Trip reductions that occur in other areas may allow enough trip credits for Stanford to meet its No New Net Commute Trip standard thus allowing negative impacts to West Menlo Park to be ignored.

2

2) Funding of off-campus circulation infrastructure improvements may qualify for trip credits as long as the improvements would enhance safety or increase mobility for pedestrians, bicyclists or transit users within the local impact area. While at face value, it seems like this could benefit West Menlo Park, a requirement for such credits is evidence demonstrating how the infrastructure project would remove vehicular trips from the local impact area. Without a commitment from Stanford to redirect vehicles away from or off our congested Corridor, this will not be possible.

3

It does not include additional traffic related to other Stanford developments that disproportionately affect our Corridor. Specifically, it does not include hospital trips (for employees and visitors) for which many are initiated from West Menlo Park roadways feeding into West Sand Hill Rd nor trips to other Stanford development projects along Sand Hill Road.

4

The EIR should guarantee that funds for transportation mitigation not be given to distant transit hubs, rather funds should be directed to projects that benefit the affected neighborhoods/geographic area.

5

In summary, it is incumbent that the EIR acknowledge the traffic congestion that will impact nearby main roadways in San Mateo County specifically Alpine Road, Santa Cruz Avenue and Alameda de las Pulgas. Simply painting bike lanes on Santa Cruz Avenue is not significant enough. Rather, the funding of pedestrian infrastructure (new sidewalks, crosswalk signage and striping, re-engineering the Y intersection and other more costly improvements) and increased Marguerite shuttles are examples of real mitigations that would make a difference in the lives of those in our part of town.

6

The draft EIR does not adequately represent the interests of those of us in San Mateo County. Even though Stanford is located in Santa Clara County, much of the traffic will be felt elsewhere.

7

Comment Letter I-Winikoff

Sincerely,
David Winikoff
SMC resident

5.2.3.176 Responses to Comments from David Winikoff

- I-Winikoff-1 Please see Response to Comment I-Appel-1.
- I-Winikoff-2 Please see Response to Comment I-Appel-1.
- I-Winikoff-3 Please see Response to Comment I-Appel-1.
- I-Winikoff-4 Please see Response to Comment I-Appel-1.
- I-Winikoff-5 Please see Response to Comment I-Appel-1.
- I-Winikoff-6 Please see Response to Comment I-Appel-1.
- I-Winikoff-7 Please see Response to Comment I-Appel-1.



County of Santa Clara
Department of Planning and Development

Stanford University 2018 General Use Permit
Draft EIR Comment Form

DRAFT EIR COMMENTS

(Please print clearly and legibly)

Please hand in during the meeting or mail (address on back) or email by **February 2, 2018**.

Name:

Sen Wolosin

Organization (if any):

Parents for Safe Routes - Menlo Park-based Advocacy Group

Address (optional):

City, State, Zip:

Menlo Park, CA 94025

E-mail:

This comment form is being furnished to obtain comments and questions from the public on the **Stanford University 2018 General Use Permit Draft EIR**. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

I represent over 350 concerned citizens in Menlo Park who
believe that every child should be able to walk and bike to school
safely. We agree with the City of Menlo Park that Stanford should help
to mitigate traffic by providing funds for the Alameda del las Pulgas /
Santa Cruz corridor, Middle Avenue and bikelped crossing at SDO El Camino.
The flow around Menlo Park schools must be taken into consideration
while considering traffic mitigations. While the Palo Alto schools and city
have a formalized Safe Routes to School program, Menlo Park does not.
We ask that any considerations given to Palo Alto Safe Routes and
schools also be applied to schools in Menlo Park. We will be
just as affected as Palo Alto, even more so since our schools are
located between the main Stanford campus and the new Redwood
City Stanford campus. Thank you for your consideration.

(More space on reverse side)

5.2.3.177 Responses to Comments from Jen Wolosin

I-Wolosin-1 Stanford proposes to fund four sets of off-site bicycle facility improvements in communities surrounding Stanford, including the cities of East Palo Alto, Palo Alto, and Menlo Park; and unincorporated San Mateo County. These improvements are subject to approval by each jurisdiction in which they are located. The proposed funding for off-site bicycle facility improvements is intended to reduce the potential for local vehicle congestion effects by encouraging use of alternative modes of transportation. Please see Chapter 8 of the Draft EIR, commencing on page 8-1, for more information regarding the four sets of bicycle facility improvements that Stanford has offered to fund.

If Stanford does not achieve the no net new commute trips standard, Santa Clara County would fund intersection improvements identified in the Draft EIR. However, if the use of the funds for such improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area, which may include bicycle facility improvements in neighboring cities.

Please refer to Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for additional discussion of bicycle infrastructure improvements.

The Suggested Routes to School improvements that would be implemented as part of the proposed Project are those on Stanford lands regulated by the General Use Permit in unincorporated Santa Clara County. The Menlo Park schools are outside the boundaries of the General Use Permit. Further, as described on page 5.15-102 of the Draft EIR, the Menlo Park neighborhoods of Allied Arts, Central Menlo Park, and University Heights were considered as part of the neighborhood traffic impact analysis, and no significant traffic impacts of the proposed Project were identified.

Comment Letter I-WongK

From: [Kimberley Wong](#)
To: [Rader, David](#)
Cc: [Cortese, Dave](#); [Chavez, Cindy](#); [Supervisor Simitian](#); [Wasserman, Mike](#); [Supervisor Yeager](#)
Subject: Stanford GUP (2018-2035) EIR Comments
Date: Friday, February 2, 2018 1:51:39 PM

Dear David Nader

Cc: Santa Clara County Supervisors

My family has lived in Palo Alto since the 1900's and I do not want to go back to the days when there was a dirt road on University and a cable car going through it. But I also don't want to see gridlock on University almost all hours of the waking day. The traffic on Embarcadero traveling to Stanford has also become unbearable all hours of the day. During the early morning I see that commuters are clearly traveling into Stanford. I know because I live one block from Embarcadero and Alma and used to regularly ride my bike in the wee hours of the morning to work at Stanford Hospital. In only the last few years traffic has worsened considerably.

Stanford is an amazing institution with incredible contributions in research, education, cultural events, and grounds for the public to visit... Unfortunately, as I run through the campus regularly, I have for years been redirected around construction sites that seem to be never ending, never finished and channel cars dangerously past bikers and runners like me. The impacts of the construction on the main campus road is clearly visible, clearly disruptive and clearly lessens our quality of life every day. I can't imagine what it will be like to endure 7 more years of this type of construction! And I am sure once the Lucille Packard Hospital, garages and buildings are finally built how much more traffic will be generated.

The Draft EIR claims that impacts but can be mitigated... or are only somewhat impacted... I have heard this countless times from studies that are never extensive enough, never find enough serious impacts to warrant rejecting a project, and are passed based on promises of the applicant. Unfortunately there is no enforcement if the school reneges on these promises. From reports, Stanford has already violated many of their previous GUP requirements. Why should they be allowed to go forth when they knowingly cannot abide by the current rules?

Their expansion plans of growing their campus and adding 2+ millions square feet of non-residential buildings plus 9000 units of housing is tremendous. How can this not add "No Net New Trips" to the campus? Stanford is not an island... The Marguerite shuttle, bikers, walkers and those taking transit into the city of Palo Alto help reduce traffic but only minimally. But for part time workers, for the many staff who must work late shifts, have families to support, how can they afford to live in Palo Alto? Many must commute from afar in less expensive areas such as San Jose and the East Bay. Proposed are 550 new housing for Faculty, 900 beds for graduate students... O for PostDocs, Staff and other workers? How can this generate no net new trips if only

Comment Letter I-WongK

a fraction can use public transportation and cannot live in this area?

↑ 5 cont.

Any project that claims "significant and unavoidable impacts" in the areas of Cultural Resources, Noise and Vibration and Transportation-Traffic" should not be passed. Everything is avoidable... Alter the plans, reduce the extent to which growth is allowed or just say "No"! These are not just a few minor issues but are major impacts especially regarding traffic that will not just affect those on the campus but the city and residents of Palo Alto. Stanford contributes to burdens on the neighboring streets, neighboring schools, communities and its resources but doesn't pay Palo Alto for its share of the taxes as a non-profit. We must insist on Stanford providing a maximum build out number based on accurate projections. We must insist on requesting Stanford to build infrastructure to support the growth. Infrastructure must be established in terms of extra schools, extra shuttles, increased community support all funded by Stanford before it is allowed to grow. If they are not willing, then please do not approve the Stanford GUP application.

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Instead of asking, "What can Palo Alto endure?", we need to start thinking of "What is the best for Palo Alto?". How can we preserve the pleasant livable community that has made it such an ideal place to grow up and raise our families? Please I ask you to consider preserving what is left of Palo Alto before it falls victim to the quest for expansion that has left every other city to the north and south of us in traffic snarls and a jungles of concrete parking garages and high rises.

9

Thank you for your consideration.

Regards,
Kimberley Wong,
longtime resident of Palo Alto

5.2.3.178 Responses to Comments from Kimberley Wong

I-WongK-1 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-WongK-2 The comment is noted but does not address the adequacy of the Draft EIR. Regional traffic growth, specifically traffic growth generated by projects outside the proposed General Use Permit boundary, cannot be regulated by the Project and is outside the scope of this EIR. Please refer to Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

I-WongK-3 These comments do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

However, as discussed in the Draft EIR, Chapter 1 Introduction, page 2-5, as required under CEQA (see CEQA Guidelines, Section 15097), a Mitigation Monitoring and Reporting Program (MMRP) will be prepared and presented to the County Board of Supervisors at the time of certification of the Final EIR for the proposed Project and will identify the specific timing and roles and responsibilities for implementation of adopted mitigation measures.

I-WongK-4 Please refer to Master Response 13: Transportation and Traffic, Topic 6, No Net New Commute Trips Standard for a discussion of the effectiveness of the no net new commute trips standard, including the ability to expand the program to reduce more vehicle trips in the future.

I-WongK-5 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

I-WongK-6 The comment expresses personal opinions that do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments. Regarding rejection of the proposed Project, see Master Response 8: EIR Alternatives, Topic 1: CEQA Requirements for Alternatives and Alternatives Evaluated in the EIR, under No Project Alternative. The County Board of Supervisors will determine if there are feasible alternatives that would substantially lessen the significant environmental effects when it considers certification of the EIR. The County Board of Supervisors may approve a project with one or more significant unavoidable impacts, if it concludes that the unavoidable environmental damage from the project is acceptable when balanced against the project's benefits. In this case, the County would be required to adopt a statement of overriding considerations when it approves the Project detailing why it believes that specific economic, legal, social, technological, or other stated benefits, including regionwide or statewide environmental benefits, are sufficient to warrant Project approval (Public Resources Code Section 21081(b); CEQA Guidelines Section 15093). The statement of overriding considerations is required to explain in writing the specific reasons supporting the County's action to approve a

project with one or more significant unavoidable impacts based on the Final EIR and/or other information in the record. In addition to the statement of overriding considerations, the County would also be required to adopt findings that it had adopted all feasible mitigation measures to reduce the project's significant effects, and that additional mitigation measures would be infeasible.

- I-WongK-7 With respect to a maximum buildout for Stanford, please see Master Response 2: Non-Project Planning Processes, Topic 1: Sustainable Development Study and Master Response 5: Project Description, Topic 2: Scope of Proposed Project and Analysis.
- I-WongK-8 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- I-WongK-9 The comment expresses personal opinions that do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

Comment Letter I-WongN

From: [Nancy Wong](#)
To: [Rader, David](#)
Subject: County of Santa Clara, Planning and Development - Stanford Expansion Request
Date: Sunday, February 4, 2018 2:09:20 PM

Dear Mr. Rader,

I have concerns about the expansion of over 2 million square feet. They are already undergoing expansion all over. This will have an additional huge impact on our community with respect to more congestion and pollution.

1

The current request is unreasonable. In particular,

- 1) The expansion of Caltrain capacity expected with electrification has already been "consumed" by previous projects.
- 2) Stanford traffic trip "credits" should be limited (finite) in number so as not to create an open-ended system where the letter of the agreement could be met while skirting the spirit.
- 3) As the largest landowner, employer and developer in the region, Stanford must contribute both financial and intellectual resources to addressing the traffic challenges in the broader community in which it resides (e.g. grade separations for the Caltrain, state-of-the-art traffic mitigation throughout the area, not merely at the campus boundary). Stanford should also be asked to contribute land for mitigating the risk of floods, as well as drought (one example, a reservoir, such as the area around Sears Dam).

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3
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5

Thank you for your consideration. I hope that this plan will be greatly curtailed.

6

Sincerely,

Nancy L Wong,
Palo Alto, Ca

5.2.3.179 Responses to Comments from Nancy Wong

I-WongN-1 Due to lack of specificity in the 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, and Section 5.15 Transportation and Traffic which address all Project and contribution to cumulative impacts to air quality and traffic associated with the construction and operation of the proposed Project.

I-WongN-2 Please see Response to Comment I-Lewnes-2.

I-WongN-3 Please see Response to Comment I-Lewnes-3.

I-WongN-4 Please see Response to Comment I-Lewnes-4.

I-WongN-5 Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed.

I-WongN-6 The comment is noted.

Comment Letter I-Woodward

From: [Steven Woodward](#)
To: [Rader, David](#)
Subject: Stanford 2018 GUP draft EIR
Date: Saturday, November 4, 2017 5:11:51 PM

Dear Mr. Rader,

I would like to make the following points regarding Stanford's 2018 GUP proposal and the draft EIR pertaining to it. The overriding issue to me as a College Terrace resident is traffic. As documented in the EIR, the proposed increases in local traffic are potentially disastrous for university neighbors. This potential is built into the very methodology for estimating impacts as follows.

1. The new vehicle miles traveled modeling approach systematically ignores localized impacts.
2. In the analyses of Fehr and Peers , Stanford Avenue is not interpreted as a neighborhood street, or as integral to College Terrace. This explains why the TIA- and TIRE-based predictions related to College Terrace traffic increases are mutually contradictory. Inclusion of Stanford Avenue as part of College Terrace, correspondent with the widely-held and common-sense view of this neighborhood, would substantially elevate the related TIRE- and TIA-based estimates of College Terrace traffic impacts. At present, Stanford gets these impacts "for free". The projected 1892 additional daily trips on Stanford Ave would not be "free" for the residents of that street and adjoining streets.
3. The intersection of Bowdoin Street and Stanford Avenue is excluded from the analysis of College Terrace traffic impacts based on its being "unsignaled". This violates common sense and cannot be the basis of sound policy. I would like to take this opportunity to suggest that a FastPass-based toll collection system at Bowdoin St. entry point to the campus could flexibly shift commute trips to other points of entry having lower impacts on Palo Alto neighborhoods.

Notwithstanding the university's laudable TDM programs ,the GUP proposal (tacitly) and the draft EIR (explicitly) anticipate violations of the No Net New Commute Trips limits. Remarkably, the proposed remedy for the locally disastrous traffic increases that might be expected at, for example, the Stanford-Bowdoin intersection, *are not directly mitigated*. Instead, in the event of standing NNCT violations, moneys are promised to improve traffic conditions *in other parts of the neighboring communities*. These moneys are essentially a bribe to the county to sacrifice the affected neighborhoods. This bribery falls into the category of "lawful but awful" and should not be countenanced by county officials.

Finally, I would like to second the suggestions made by others, including Commissioner Simitian, that consideration of longer time horizons replace the ongoing GUP-by-GUP approach. At the university's projected long-term growth rate of 1.2% per year, the campus

Comment Letter I-Woodward

population will double in 60 years. Appreciation of the university's TDM programs should not obscure the fact that the NNCT limit will be irrelevant in the not-to-distant future, particularly if the Caltrain contribution to trip reduction has topped out. Cost sharing re larger projects such as grade separation should be considered in that light.

↑
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cont.

Sincerely yours,
Steven Woodward

5.2.3.180 Responses to Comments from Steven Woodward

- I-Woodward-1 Please refer to Master Response 13: Transportation and Traffic, Topic 8: Neighborhood Street Impacts for an explanation of how neighborhood streets were selected for evaluation and how it was determined that the proposed Project would not result in significant traffic intrusion into any nearby neighborhoods.
- I-Woodward-2 Please refer to Master Response 13: Transportation and Traffic, Topic 10: Vehicle Miles Traveled for additional detail on the VMT analysis, and Topic 5: Intersection Impacts and Mitigation for a discussion of how localized traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.
- I-Woodward-3 Stanford Avenue impacts are assessed in the 2018 General Use Permit Draft EIR via peak hour intersection analysis at Stanford Avenue/Junipero Serra Boulevard, Stanford Avenue/Bowdoin Street, and Stanford Avenue/El Camino Real (see Impacts 5.15-2 and 5.15-9). The Draft EIR discusses impacts at area intersections under 2018 Baseline conditions and 2035 Cumulative conditions on pages 5.15-74 to 5.15-95 and pages 5.15-112 to 5.15-136. Stanford Avenue is identified as part of the Local/Collector street network in the Palo Alto 2030 Comprehensive Plan, adopted in November 2017 (refer to Map T-5). As a direct connector between Junipero Serra Boulevard and El Camino Real, Stanford Avenue appropriately serves as a collector roadway to distribute trips to and from those arterial roadways, in addition to serving direct residential access. The roadway was therefore not included in the neighborhood impact assessment.
- I-Woodward-4 The intersection of Bowdoin Street/Stanford Avenue is included in the analysis, as intersection #34 (see Impacts 5.15-2 and 5.15-9). The Draft EIR discusses impacts at area intersections under 2018 Baseline conditions and 2035 Cumulative conditions on pages 5.15-74 to 5.15-95 and pages 5.15-112 to 5.15-136. The suggestion regarding toll collection at the Bowdoin gateway to the campus is noted; however, because the EIR finds a less-than-significant impact on neighborhood streets such a mechanism is not warranted.
- I-Woodward-5 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. 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.

Please refer to 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 in the future.

I-Woodward-6 The comment expresses personal opinions that do not address the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-Woodward-7 Please see Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals. See also Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

Comment Letter I-Yarkin1

From: [neva yarkin](#)
To: [Rader, David](#)
Subject: neva yarkin, comments for Stanford GUP
Date: Wednesday, January 24, 2018 10:15:18 AM

Jan. 24, 2018

Here are some more comments I have regarding the Stanford GUP.

The GUP needs to look at future development in This whole area.

- 1) With Electric Trains coming the backups of cars (to cross the tracks) from having an increase of 20 trains an hour crossing the Peninsula. To look at all the crossings for the Peninsula which will clog the streets in this area. Stanford expansion will only add to this mix. 1
- 2) Castilleja School in Palo Alto wants to expand. There parking garage will be using Embarcadero Road for their entrance and exit into the parking garage. This will affect EMBARCADERO Road, a main artery onto Stanford campus. All this will affect traffic in Palo Alto. 2
- 3) EMBARCADERO ROAD in Palo Alto needs to be studied thoroughly. How much more traffic can this ROAD take? 3
- 4) Infrastructure! If Stanford gets their expansion, they need to build new roads, grocery stores, gas stations, schools to accommodate the influx of people. They will also have to help pay for new electric train costs, new road crossings on train tracks, and fire fighters for surrounding areas. 4
- 5) With increased expansion, what provision will be made for emergency vehicles rushing to the hospital, a fire, or police emergency? How will they get through traffic problems already. 5
- 6) If Stanford gets their expansion, the increase from construction traffic, mainly big trucks and heavy equipment. Stanford will need to hire traffic guards to help with traffic. Also, there should be certain big truck hours when the rest of us don't have to deal with driving on ALMA with big trucks which could cause an accident. 6
- 7) Stanford Middle Plaza at 300 - 550 El Camino, Menlo Park. This will affect the entrance into Palo Alto from Menlo Park on El Camino. With Stanford expansion, how much more traffic can this area have with the hospital, office building and now the Stanford GUP. 7

Thank you.

Sincerely,

Neva Yarkin
[REDACTED]
Palo Alto, CA 94301



5.2.3.181 Responses to Comments from Neva Yarkin

I-Yarkin1-1 There are 42 at-grade crossings on the Caltrain corridor.⁴⁸ Caltrain has started on its Business Plan process, which will identify future service patterns and help Caltrain prioritize grade separation projects.⁴⁹ The construction process related to electrification and completing grade separations in the local communities will be complex, and Caltrain has recognized that its work will temporarily influence local circulation patterns during the construction period. However, these impacts are appropriately addressed in the environmental review of the grade-separation projects, which will occur once the projects have secured adequate funding and details of these projects become known. Since it is unknown when or even if the projects will be constructed, the 2018 General Use Permit EIR cannot feasibly include these potential, temporary effects in the impact analysis.

The VTA model used for the Stanford 2018 General Use Permit traffic forecasting, which was provided by the VTA, includes the Caltrain Electrification Project. The model does not assume that electrification would result in the effective closure of the grade crossings. The Caltrain Electrification EIR assessed the impacts of electrification on the grade crossings and intersections adjacent to the grade crossings, and recommended mitigation measures to address significant traffic operation impacts associated with the Project. Implementation of these mitigation measures is not associated with the proposed Project or its impacts.

I-Yarkin1-2 Castilleja School is an independent school for girls grade six through 12 located within Palo Alto, and not associated with the proposed Project or its impacts. The City of Palo Alto is currently preparing an EIR under CEQA for a proposed expansion of that school.⁵⁰ Accordingly, associated traffic and other environmental impacts of that project are being addressed by the City in the environmental review for that project.

The comment does not address the proposed Project or the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

I-Yarkin1-3 The comment does not specifically address the proposed Project or the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments. However, please note several study intersections on Embarcadero Road in Palo Alto were included in the traffic analysis in the Draft EIR, Section 5.15 Transportation and Traffic.

⁴⁸ See <http://www.caltrain.com/Assets/Caltrain+Modernization+Program/Presentations/Grade+Separation+Update.pdf> (slide 3).

⁴⁹ See <http://www.caltrain.com/Assets/Agendas+and+Minutes/JPB/CAC/Presentations/2018/2018-02-01+CBP+Staff+Report.pdf>.

⁵⁰ Please see https://www.cityofpaloalto.org/gov/topics/castilleja_school/default.asp.

- I-Yarkin1-4 This comment does not specifically address the proposed Project or the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.
- I-Yarkin1-5 Please refer to Master Response 11: Public Services, Topic 1: Emergency Access and Response Times.
- I-Yarkin1-6 The Draft EIR (Impact 5.15-1) discusses impacts from construction traffic on pages 5.15-68 to 5.15-73. The Draft EIR acknowledges that construction activities under the proposed 2018 General Use Permit would be similar to activities occurring on an ongoing basis under the 2000 General Use Permit, and assumes that future truck traffic would be similar to existing truck traffic. The Draft EIR identifies a set of construction traffic control measures (Mitigation Measure 5.15-1) to address impacts from construction of individual 2018 General Use Permit projects. Mitigation Measure 5.15-1, as revised in Chapter 2, requires the use of truck routes designated by the cities of Palo Alto and Menlo Park, and, in the event that the County of San Mateo designates truck routes, by the County of San Mateo and requires Stanford to make feasible attempts to avoid construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays to avoid the commute hours.
- I-Yarkin1-7 The Stanford Middle Plaza project is a planned mixed-use development project located in Menlo Park that is currently under construction. The City of Menlo Park completed environmental review under CEQA for the project, which considered traffic impacts associated with that development.⁵¹ Furthermore, traffic associated with that project was included in the cumulative analysis for the EIR for the 2018 General Use Permit. Please see also 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.

⁵¹ Please see <https://www.menlopark.org/172/Middle-Plaza-at-500-El-Camino-Real>.

Comment Letter I-Yarkin2

From: [neva yarkin](#)
To: [Rader, David](#)
Subject: from neva yarkin, comments for the EIR
Date: Thursday, January 25, 2018 1:46:52 PM

Here is another comment that I just heard yesterday that deserves to be addressed...

A friend of mine, a middle age mother with 3 children (one of those a baby) took the Marguerite Bus into Stanford from (The Market in Palo Alto on Embarcadero Road) to her lab near the medical center. It took her 30 to 40 minutes one way on the Marguerite Bus.

It took her to drive her own car 15 to 17 minutes to drive in her own car.

Do you think a mother has the time to double her commute time on the Marguerite bus trying to get to work?

Let's be realistic and practical !!! Look at real families, real people who might be trying to do the right thing by taking the Marguerite.

Sincerely,

Neva Yarkin

Palo Alto, CA 94301

1

5.2.3.182 Responses to Comments from Neva Yarkin

I-Yarkin2-1 The comment does not specifically address the proposed Project or the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

From: [neva yarkin](#)
To: [Rader, David](#)
Subject: from neva yarkin EIR Stanford
Date: Friday, October 06, 2017 11:40:52 AM

Oct. 6, 2017

Stanford 2018 General Use Permit Draft EIR

To: David Rader

David.rader@pin.sccgov.org

Dear David Rader,

Regarding EIR for General Use Permit of Stanford University

It is great that Stanford will be building more housing on campus. I'm sure they will need also new buildings for research and academics.

I'm all for the above but at what expense will this impact the **city of Palo Alto** and surrounding communities? The **traffic** is already a mess on Embarcadero, going into Stanford, 280 is a nightmare, and 101 can't hold any more people.

I asked before, what about **infrastructure** at a previous meeting. **New schools, supermarkets, gas stations, shopping malls, new medical**

Comment Letter I-Yarkin3

clinics, and roads will be needed, etc. Where will that be built? Who will be responsible for that? ↑ 2
cont.

Cost of living will probably also be affected. | 3

Construction will go on for years. Big Heavy Construction Trucks will be in this area for years. They go down Churchill Road early in the morning, and will use Embarcadero Road, Freeways 280 and 101 to build the above. | 4

My family has been in Palo Alto for 60 years. I grew up here riding a bike everywhere in town. |

What about my **quality of life**? | 5

I'm 67 years old and need some **peace** in my life. How will that happen with this expansion? |

Sincerely,

Neva Yarkin

[REDACTED]

Palo Alto, CA

[REDACTED]

5.2.3.183 Responses to Comments from Neva Yarkin

- I-Yarkin3-1 Due to lack of specificity, no specific response can be provided; 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 cumulative traffic impacts, and identifies mitigation to reduce these impacts to the extent feasible.
- I-Yarkin3-2 A general comment is made inquiring about new schools, supermarkets, gas stations, shopping malls, new medical clinics and roads, and where they will be built. Due to lack of specificity, no specific response can be provided; please see Master Response 3: General Comments on EIR and Environmental Topics. However, please see Draft EIR Section 5.15 Transportation and Traffic, and Section 5.16 Utilities and Service Systems which addresses all Project and cumulative infrastructure impacts, including for transportation, and identifies mitigation to reduce these impacts to the extent feasible.
- I-Yarkin3-3 Economic issues are outside of the scope of this EIR; please see Master Response 1: Non-CEQA Comments.
- I-Yarkin3-4 A general comment is made about construction traffic. Construction traffic is addressed in the Draft EIR, Impact 5.15-1 and mitigation is identified to ensure construction traffic effects would be reduced to a less-than-significant level.
- I-Yarkin3-5 The comment is noted, but does not specifically address the proposed Project or the adequacy of the Draft EIR; please see Master Response 1: Non-CEQA Comments.

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