6.2.1 Recirculated Portions of Draft EIR Comment Letters – Agencies



CITY OF EAST PALO ALTO OFFICE OF THE MAYOR 2415 UNIVERSITY AVENUE EAST PALO ALTO, CA 94303

July 25, 2018

Joe Simitian Board President Santa Clara County Board of Supervisors 70 West Hedding Street, 10th Floor San Jose, CA 95110

Dear Board President Simitian:

We are writing to thank the Santa Clara County Board of Supervisors and Department of Planning and Development for your efforts to ensure that the Stanford General Use Permit (GUP) is a model of balanced growth that does not exacerbate the current severe regional housing crisis.

The housing crisis will continue as long as local governments approve General Plans (and GUPs) that perpetuate a crippling jobs/housing imbalance into the foreseeable future. The housing crisis is threatening the very fabric of our community through the displacement of long-term families. We appreciate County staff's response to these concerns by studying Housing Alternatives A & B.

These Housing Alternatives would produce approximately 4,425 to 5,699 units or beds on Stanford property. Alternative A would fully mitigate the direct housing demand created by Stanford's proposed expansion, rather than impacting neighboring jurisdictions with this added need. Stanford relies on a significant number of service employees for the daily operation and maintenance of facilities. The County should approve a GUP that prioritizes the onsite development of housing affordable at the very low and low income levels for these service employees.

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The recirculated DEIR articulates a balanced growth option that will help to mitigate the total impact of the housing needs that the Stanford's proposal will create and will help to prevent a greater demand for housing being exported to other cities. Stanford has a unique opportunity lead the region in balanced growth. As one of the leading intellectual centers of the modern world, if Stanford is not able to create a balanced growth model, what hope is there for this region?

In the event that all housing units identified in Housing Alternative A cannot be developed on Stanford's property, our recommendation is that a combination of methods be employed, thereby balancing the needs of Stanford and the region and the impacts on neighboring jurisdictions. The combined approach could involve building units on-site and establishing an impact fee that would be available to jurisdictions to fund the development of affordable housing. As substantiated by the Nexus Study, an impact fee of \$143.10 per square foot of non-residential development could be approved by the Board of Supervisors to help off-set the housing demand created by such development.

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The criteria for the allocation of future potential affordable housing funds should ensure that East Palo Alto and other impacted jurisdictions are eligible locations for the funds, and that the criteria related to proximity to transit does not disadvantage cities that do not have fixed rail transit stations.

To mitigate the housing demand created by Stanford's proposal, it is essential that the jurisdictions in San Mateo County that are located near Stanford have access to impact fee revenue for the purposes of developing affordable housing.

The recirculated DEIR also identifies other impacts associated with the housing options. If Stanford does not mitigate all housing impacts its proposal will create including the housing needs of its low income workers, the housing crisis will be exacerbated and other cities will have to bear that burden.

On behalf of the entire City Council, I appreciate your efforts and consideration of our requests. We look forward to continuing to be an active and constructive participant in supporting balanced growth and avoiding potential impacts that may intensify the current housing crisis. If you have any questions, please reach out to Sean Charpentier, Assistant City Manager at (650) 833-8946 or <u>scharpentier@cityofepa.org</u>

Sincerely,

Ruben Abrica, Mayor

 c: City of East Palo Alto City Council Santa Clara County Board of Supervisors San Mateo County Board of Supervisors Stanford University, Jean K. McCown David Rader, Santa Clara County Planning Department 4

6.2.1.1 Responses to Comments from City of East Palo Alto

- RA-EPA-1 The comments are acknowledged.
- RA-EPA-2 The comment regarding the benefits of the housing alternatives accommodating the Project housing demand on-site are acknowledged.

Regarding the request to approve a general use permit that prioritizes on-site development for affordable housing, the comment is acknowledged. Please note, however, that impacts of the Project or alternatives on affordable housing is a socioeconomic issue not required to be analyzed under CEQA. Please also see Master Response 10: Affordable Housing.

RA-EPA-3 The use of funds within the Stanford Affordable Housing Fund is determined by the County Board of Supervisors based on adopted procedures for disbursement of the funds. The use of funds within the Stanford Affordable Housing Fund and the amount of housing impact fees are socioeconomic issues not required to be analyzed under CEQA.

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

RA-EPA-4 The comment recognizes that the Recirculated Portions of the Draft EIR discuss indirect impacts of off-campus housing. As discussed on Recirculated Portions of Draft EIR pages 2-7 through 2-12, the Project's indirect environmental impacts related to off-campus housing would be significant and unavoidable (Impact 5.17-1). The construction of on- or off-campus housing under Additional Housing Alternative A and Additional Housing Alternative B also would result in a significant and unavoidable impact (see Impact 7A.17-1 on pages 2-253 through 2-258 and Impact 7B.17-1 on pages 2-455 through 2-460, respectively).

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

City Council

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July 25, 2018

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

RE: Stanford University 2018 General Use Permit (File #: 7165-16P-16GP-16Z-16EIR) Comments on the Recirculated Alternatives Chapter of Draft EIR

Dear Mr. Rader,

The City of Menlo Park appreciates the steps that the County of Santa Clara is taking to evaluate and disclose the impacts associated with Stanford providing the housing necessary to accommodate the proposed expansion of the Stanford University campus.

Attached please find the City of Menlo Park's comments on the Recirculated Alternatives Chapter of the Draft Environmental Impact Report (Draft EIR) for the Stanford University 2018 General Use Permit (GUP) project. The attached letter includes new and modified comments that highlight several significant deficiencies in the Draft EIR and includes a copy of the comment letter submitted by the City of Menlo Park on the Draft EIR on February 1, 2018. This response has not been approved by the City Council due to their not having a City Council meeting during the extended comment period, but was approved by the Council appointed subcommittee of Mayor Ohtaki and Councilmember Keith.

The identified deficiencies must be addressed in a recirculated Draft EIR that contains sufficient mitigation measures to mitigate project impacts, including the impacts of providing the necessary housing. The County should not consider approval of the 2018 GUP until such additional information is provided to decision makers.

Please contact Community Development Director, Mark Muenzer at 650-330-6600 with questions.

City of Menlo Park Stanford University 2018 General Use Permit, Comments on the Recirculated Alternatives Chapter of the Draft EIR

Sincerely,

Peter Ohtaki

Mayor

Enclosures:

- 1. New and Modified Comments on Recirculated Alternatives Chapter of Draft EIR
- 2. City of Menlo Park's letter commenting on the Draft EIR dated February 1, 2018

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City of Menlo Park Stanford University 2018 General Use Permit, Comments on the Recirculated Alternatives Chapter of the Draft EIR

Project Description Concerns and Questions

- 1. In response to community feedback requesting that Stanford provide the housing necessary to support its own growth, the Recirculated Alternatives Chapter of the Draft EIR analyzes two new housing alternatives. Although these alternatives have the potential to positively address the need for housing created by the 2018 GUP, the revised analysis reflects a fundamental flaw in the California Environmental Quality Act (CEQA) process. By providing more housing for the students and workers that will fill the additional campus space proposed in the 2018 GUP, some of the impacts reported in the Recirculated Alternatives Chapter of the Draft EIR appear worse than those reported for the proposed project. Approving the proposed project without the additional needed housing would appear to reduce the environmental impacts of the 2018 GUP. However, housing for the additional students and workers will be required regardless of whether it is on Stanford lands or in another location. If the housing is built elsewhere to meet the need created by the additional Stanford students and workers, the impacts of building that housing will be deferred to other analyses and jurisdictions. This shifts the burden of housing students and workers, and constructing the transportation infrastructure to accommodate the increased travel to other agencies without supporting resources to meet these needs.
- 2. In the Revised Alternatives Chapter, consistent with the Draft EIR, Stanford is seeking "flexibility with accountability." The housing alternatives study an anticipated number of beds/units that will include a range of products from a single undergraduate bed to a single-family home for a faculty member with a full household. These different uses will have disparate impacts. For example, what is the cost of educating all kindergarten through twelfth grade students attending local schools of the new residents? Without specificity as to the amount, size, and intensity of the various housing products, there are no assurances that the impacts have been adequately assessed in the Draft EIR.
- 3. In addition to the previous comments from the City of Menlo Park, the 2018 GUP and Draft EIR should evaluate changes in the Project Description, or as mitigation measures to:
 - a. Provide a direct tunnel connection from Campus Drive West to I-280 between Page Mill Road and Alpine Road without a connection at Junipero Serra Boulevard. Also force traffic to use Page Mill Road instead of Alpine Road since there are limited residences along Page Mill frontage to be impacted.
 - b. Provide satellite parking lots with connections to the campus to reduce traffic on Sand Hill Road, Alpine Road and Page Mill Road. These satellite lots could be connected to the campus with Marguerite, long-distance commuter shuttles already in service along these routes, or by other non-motorized transportation options such as a gondola.
 - c. The City requests that a contribution towards the Middle Avenue Pedestrian/Bicycle Crossing, Dumbarton Rail Corridor, and Sand Hill Road-Santa Cruz Avenue-Alameda de las Pulgas-Alpine Road corridor improvements be prioritized for mitigation.

City of Menlo Park Stanford University 2018 General Use Permit, Comments on the Recirculated Alternatives Chapter of the Draft EIR

Transportation

- 4. The requested changes to the existing conditions listed in Paragraph 7 of the previously submitted comment letter were not addressed in the Recirculated Alternatives Chapter of the Draft EIR and need to be incorporated.
- 5. The No Net New Commute Trips mitigation program does not fully mitigate transportation impacts and must be modified.

The 2018 GUP application materials and Draft EIR describe Stanford's continued participation in the No Net New Commute Trips mitigation program. The program limits peak hour, peak direction vehicular trips associated with Stanford University. An unintended consequence of the No Net New Commute Trips program is that students and workers live further from campus, putting the burden on those jurisdictions, but allows Stanford to control the number and timing of commute trips. Further, in the context of the proposed alternatives, this program is fundamentally flawed as the alternatives generate mostly trips in the reverse peak commute direction, and the No Net New Commute Trips program does not mitigate these impacts. Comment 7.c.ii in the City's prior comment letter raised this concern, which is exacerbated with the consideration of both housing alternatives.

The City continues to request an analysis of the reverse direction trips be conducted and appropriate mitigation measures be identified. The mitigation program should could be expanded to limit any new impacts from reverse commute trips by including them in the No Net New Trips program, and no growth in such trips should be allowed over existing conditions. This is especially important since the proposed housing alternatives in the recirculated chapter consider additional on-campus housing, and reverse commute trips from the spouses and/or families of the Stanford affiliates would not be captured by the No Net New Trips program as proposed.

6. The traffic operations disclosed in tables 7A.15-4, 7A.15-11, 7B.15-4, and 7B.15-11 do not show significant changes in average delay and level of service with either Alternatives A or B at the intersections within the City of Menlo Park's jurisdiction. The City raised several questions about the analysis results in the prior comment letter on the Draft EIR, which still need to be resolved. However, the results of the alternatives analysis appear to be inconsistent with the public statements made by Stanford University that the alternatives will exacerbate traffic delays and concentrate local impacts in the mid-peninsula.

Housing

 Although the alternatives in the Recirculated Alternatives Chapter purport to require the provision of additional housing on-campus, the description of both Alternatives A and B indicate that "Stanford could elect to, subject to approval by the County, offset the incremental off-campus

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cont.

City of Menlo Park Stanford University 2018 General Use Permit, Comments on the Recirculated Alternatives Chapter of the Draft EIR

housing demand by providing off-campus housing" and "it is assumed that any portion of affordable off-campus housing provided by Stanford would be located within a six-mile radius of the campus" (pages 2-54 and 2-259). Therefore, with these alternatives Stanford would not actually be required to provide more housing on-campus to meet the need created by the 2018 GUP. While Stanford's provision of housing anywhere would reduce the impact of the regional housing demand and potentially improve affordability, the City of Menlo Park does not support the provision of additional housing for Stanford within the Menlo Park City limits except as described in comment 9 below, and encourages the County to require that the housing be provided on-campus.

- 8. Stanford should be required to pay an in-lieu fee that will fully mitigate for the affordable housing need generated by the Stanford 2018 GUP. The City supports the increase in the affordable housing fee for new non-residential development on Stanford's campus to \$68.50 per square foot.
- 9. When Stanford University purchases or develops property for the provision of students, faculty and staff housing in adjacent jurisdictions, the City of Menlo Park and other special districts (emergency and fire services and local school districts, etc.) lose property tax revenues from the property in perpetuity, since Stanford does not pay property taxes on lands used to support the University. Therefore, the City opposes any additional housing provided by Stanford in Menlo Park unless Stanford honors the market rate property tax rates annually for any housing secured within the City.

Hydrology/Water Quality

- 10. Stanford should be required to coordinate and cooperate, including funding, with the San Francisquito Creek Joint Powers Authority to provide meaningful large-scale upstream detention facilities to attenuate and manage flows in San Francisquito Creek.
- 11. In addition, the City requests that the 2018 GUP include measures that either mitigate for increase flows and/or create no net increase in storm water runoff to the neighboring downstream communities that are located within the San Francisquito Creek Watershed Area.

City of Menlo Park 701 Laurel St., Menlo Park, CA 94025 tel 650-330-6600 www.menlopark.org

6.2 Comments and Responses – Agencies

6.2.1.2 Responses to Comments from City of Menlo Park

- RA-MP-1 Due to the lack of specificity in the comment, no specific response is possible. However, each of the specific issues raised by the comments in this letter are addressed in the individual responses to the comments that follow. Please also see Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation.
- RA-MP-2 This comment about housing being required for the Project regardless of whether that housing is provided on- or off-campus and the impacts of that housing are acknowledged. This is a policy matter for the County Board of Supervisors to address when it considers the proposed Project.
- RA-MP-3 Regarding comments indicating that without specificity in the amount, location and intensity of proposed housing under the additional housing alternatives, and that there are no assurances that impacts have been adequately addressed, the Recirculated Portions of Draft EIR described and analyzed Additional Housing Alternative A and Additional Housing Alternative B in a similar level of detail as the proposed Project. The level of detail provided on various housing products is based on existing information and a level of specificity that is feasible and appropriate for a Program EIR impact analysis. For additional detail, 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.

Regarding comments made concerning costs of educating school age students, state law establishes exclusive mitigation requirements for school impacts ("SB 50" school mitigation fees) and preempts local authority on this issue. Please see Master Response 12: Public Schools.

- RA-MP-4 This comment pertains to the original Draft EIR for the Project, not the Recirculated Portions of Draft EIR. With respect to the request for a tunnel connection from Campus Drive to I-280, please see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.
- RA-MP-5 This comment pertains to the original Draft EIR for the Project, not the Recirculated Portions of Draft EIR. The Draft EIR does not identify significant intersection impacts on Alpine Road. Three intersections were evaluated along Alpine Road: I-280 SB Ramps/ Alpine Road (Intersection #23); I-280 NB Ramps/Alpine Road (Intersection #24); and Junipero Serra Boulevard/ Alpine Road (Intersection #25). If Stanford is unable to expand its transportation demand management program to meet the no net new commute trips standard, campus-generated traffic is assumed to increase; however, the Traffic Impact Analysis prepared for the EIR (see Appendix TIA in the Draft EIR; see also revised TIA in Appendix TIA-REV in this Final EIR) shows that increased traffic

would not result in a significant impact at any of the study intersections on Alpine Road. Alpine Road is an arterial roadway that carries sub-regional traffic between a freeway (I-280) and Junipero Serra Boulevard, which is another arterial. As an arterial roadway, Alpine Road is intended to serve non-local trips, in addition to trips to and from connecting streets within the section between I-280 and Junipero Serra Boulevard. Non-local trips on arterial roadways are not considered neighborhood cut-through trips. With regard to safety impacts, the proposed Project would not change the design or configuration of Alpine Road. Therefore, it would not result in a safety hazard. Please see Master Response 13: Transportation and Traffic; Topic 9: Design Hazards and Safety Impacts for more information explaining why significant safety impacts would not result from increased vehicle traffic on Alpine Road.

Please refer to Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives for additional discussion of the suggested tunnel between I-280 and the Stanford campus. Please see Response to Comments I-DavisJ4-2 and I-DavisJ4-7 for additional information about the County of Santa Clara's lack of authority to prohibit vehicles from driving on Alpine Road.

RA-MP-6 This comment pertains to the original Draft EIR for the Project, not the Recirculated Portions of Draft EIR. As illustrated in Figure 5.15-1 and presented in Table 5.15-1 of the Draft EIR, Sand Hill Road, Alpine Road, and Page Mill Road are analyzed in the Section 5.15, Transportation and Traffic, and are represented by 22 intersections. 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 that, if the no net new commute trips standard is not achieved, the intersection of I-280 Northbound Ramp/Sand Hill Road would experience a significant impact; two intersections would experience significant impacts on Page Mill Road (I-280 Southbound Ramp/Page Mill Road and Junipero Serra Boulevard/Page Mill Road), and no significant impacts would occur on Alpine Road. Where significant impacts are anticipated to occur absent satisfaction of the no net new commute trips standard, feasible physical intersection improvements are identified.

The project impacts of 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project are addressed by Mitigation Measure 5.15-2. Stanford's transportation demand management (TDM) measures to shift solo drivers to transit and other alternative transportation modes have been effective in removing vehicle trips from both local streets and regional freeways.¹ The no net new commute trips standard is a monitored performance standard, as opposed to a prescribed set of transportation demand management measures. The measures that Stanford uses

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.

6.2 Comments and Responses – Agencies

to achieve the performance standard may change over time. Satellite parking could be used as one of many tools to achieve the no net new commute trips standard. However, Stanford has prioritized TDM measures that shift solo drivers to alternative modes for all or most of their commutes. Rather than discourage solo driving use, satellite parking lots located within a gondola or shuttle ride to campus would encourage solo driving most of the way to the campus. 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.

RA-MP-7 This comment pertains to the original Draft EIR for the Project, not the Recirculated Portions of 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 would use the collected funds for one or more of the intersection improvements identified in the Draft EIR. 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 areas. The City of Menlo Park's suggested priorities would be considered during this process. Further, as described in Section 8 of the Draft EIR (page 8-8), Stanford has offered to contribute funding toward the Santa Cruz Avenue/Alameda de las Pulgas corridor improvements as part of the 2018 General Use Permit project. Mitigation Measure 5.15-2 has been expanded to include an upfront fair-share payment by Stanford to address the impact of peakhour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

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

- RA-MP-8 This comment pertains to the original Draft EIR for the Project, not the Recirculated Portions of Draft EIR. Please see Responses to Comments A-MP-12 to A-MP-14 in Section 5.2.1 in this Response to Comments Document for reasons why the Draft EIR was not revised as previously requested.
- RA-MP-9 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. The traffic volumes evaluated at study locations during the peak hour and period include all vehicles and all approaches, and therefore capture the potential effects of vehicles traveling in the peak commute direction as well as those travelling in the reverse commute direction. By evaluating the worst condition within the peak period, the analysis ensures that the maximum effect of the proposed Project is identified, and if mitigation is warranted, that the mitigation is designed to prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

With respect to the comment that suggests that the no net new commute trips program is not adequate because trip monitoring is limited to peak direction trips, please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis conducted to address the impact of reverse-commute trips, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for a discussion of average daily traffic and peak hour spreading in the context of the no net new commute trips policy. TDM programs at Stanford are designed to reduce the number of single occupancy vehicles, as evidenced in the published single-occupancy vehicle rate; there are no incentives or programs that encourage drivers to travel outside the monitoring period. Although the cordon counts currently monitor only peak directional vehicular trips, TDM programs provide services, such as the Marguerite shuttle, in both directions and throughout the day. Nevertheless, 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.

See also Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation for the conditions under which recirculation of the Draft EIR is warranted.

RA-MP-10 The observation regarding changes in delay for the City of Menlo Park intersections shown in Tables 7A.15-4, 7A.15-11, 7B.15-4, and 7B.15-11 is acknowledged. As under the proposed Project, the traffic impact analysis found that under 2018 Background with Project Conditions, the only City of Menlo Park intersection at which the increase in delay would be considered a significant impact is I-280 NB Off-Ramp/Sand Hill Road. Under 2035 Cumulative with Project Conditions, the same Menlo Park intersection would experience significant delay plus Intersections #37 (El Camino Real/ Encinal Avenue); #38 (El Camino Real Valparaiso Avenue); and #41 (El Camino Real/ Ravenswood Road). Comments on the Draft EIR raised by the City of Menlo Park are responded to in Section 5.2.1 in this Response to Comments Document. The comment does not specify what public statements made by Stanford

University are being referred to. Additional Housing Alternatives A and B would result in impacts at a greater number of study intersections compared to the proposed Project. But these additional intersection impacts are located within the City of Palo Alto, and not in the City of Menlo Park.

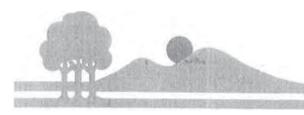
- RA-MP-11 Although, as the comment notes, Additional Housing Alternatives A and B assumed that the County would allow Stanford, subject to County approval, to elect to offset some housing demand by providing housing off campus within a six-mile radius, the environmental analysis of those alternatives assumed that all housing was provided on-campus. These alternatives were analyzed to provide the County Board of Supervisors with information on the environmental impacts of these options.
- RA-MP-12 The amount of an affordable housing fee is a socioeconomic issue not required to be analyzed under CEQA. Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- RA-MP-13 The County acknowledges that lost property tax revenues can substantially affect local jurisdictions and school districts, including the County. Property tax assessment methods are governed by state law and are not within the scope of environmental review under CEQA. State law also establishes exclusive mitigation requirements ("SB 50" school mitigation fees) for school impacts and preempts local authority on this issue.
- RA-MP-14 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. The Draft EIR does not identify any impact of the proposed Project that would require Stanford to fund additional upstream detention to manage flows in San Francisquito Creek. Please see Master Response 7: Flooding/Detention, Topic 6: Non-Project Planning Efforts to Provide Additional Detention Facilities in the San Francisquito Creek Watershed, regarding Stanford's involvement in such planning.
- RA-MP-15 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. As explained in detail in the Draft EIR, Section 5.9, Hydrology and Water Quality, and in Master Response 7: Flooding/Detention, Stanford has developed on-site detention facilities on a watershed basis to create sufficient capacity to offset increased runoff associated with all new impervious surfaces associated with remaining authorized development to be constructed under the 2000 General Use Permit, as well as new development that would be constructed under the proposed 2018 General Use Permit. With buildout of the proposed 2018 General Use Permit, there would be substantial remaining detention capacity on-campus (accommodating an additional 47 acres of impervious surface in the San Francisquito Creek watershed, and 182 acres of impervious surface in the Matadero Creek watershed). This remaining capacity is more than sufficient to handle runoff from the increased amount of impervious surfaces

projected under the 2018 General Use Permit. As a result, the proposed Project would not result in increases in peak stormwater flows from the site. As such, development under the 2018 General Use Permit would not cause downstream flooding, nor would it contribute to cumulative downstream flooding. Since no Project or cumulative impact is identified, no mitigation is required under CEQA.

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

Please note Comment Letter RA-MP contained an attachment consisting of the City's previously submitted comment letter on the Draft EIR (i.e., Comment Letter A-MP). This attachment to Comment Letter RA-MP is included in Appendix RA-MP in this Response to Comments Document. Please note that original Comment Letter A-MP is responded to in Section 5.2.1.4 in this Response to Comments Document.





CITY OF MOUNTAIN VIEW

OFFICE OF THE CITY MANAGER 500 Castro Street • Post Office Box 7540 • Mountain View • California • 94039-7540 650-903-6301 • Fax 650-962-0384

July 17, 2018

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

RECIRCULATION OF A PORTION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STANFORD UNIVERSITY 2018 GENERAL USE PERMIT (STATE CLEARINGHOUSE # 2017012022)

Dear Mr. Rader:

Thank you for the opportunity to review and comment on the recirculated portions of the Draft Environmental Impact (DEIR) for the Stanford University General Use Permit. Mountain View staff have the following comments on the DEIR:

Colocating Housing Near Jobs

As the City with the second highest percentage (nearly 10 percent) of off-campus students, faculty and staff from Stanford University who do not call the campus home, the City of Mountain View is very supportive of placing as much additional housing on the Stanford University Campus as possible. Adding housing opportunities for the University's faculty, staff, and students on campus would reduce their commute distances/ times, help increase their productivity, increase their quality of life, and also benefit the surrounding communities. The City is very interested in colocating housing near jobs and employment centers, and is doing its share by planning a significant increase in housing—up to 15,000 housing units with at least 20 percent of those as affordable housing—in the major employment centers of North Bayshore and East Whisman. We appreciate the University's leadership in helping to address the need for adding housing in the right locations.

Fair-Share Funding

We would like to reiterate the City's position regarding the concept of "fair-share funding," as we requested in our original comments on the DEIR, in a letter dated, December 12, 2017, to your office. The City believes that fair-share funding should ψ

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Mr. David Rader July 17, 2018 Page 2

apply to any intersection under the jurisdiction of our City. I have enclosed a copy of **2** that letter for your reference. **2** cont.

Intersection No. 89/ Close Castro Street

Pages 2-188, 2-228, 2-391, and 2-431 of the DEIR still indicate that "...if Castro Street is independently closed by the City of Mountain View, Stanford would not need to contribute funding to any improvements at this intersection." We would request that Stanford University make a fair-share funding allocation at that intersection, whether or not Castro Street is independently closed by the City of Mountain View. Again, the City believes that the concept of fair-share funding should apply to any intersection in our City. These comments made previously on December 12, 2017, have not yet been addressed and, therefore, still apply.

Marguerite Shuttles

The City is working on a number of initiatives to reduce single-occupancy vehicles and supports as robust a Marguerite shuttle system as possible. It is not clear in the DEIR if there will be an increase in the number or service in the Marguerite Shuttles as a result of the project, or either alternatives.

Please send a copy of the Response to Comments for the DEIR to our Planning Division. 5 If you have any questions, please contact me at (650) 903-6301, or my staff via e-mail at <u>jeff.roche@mountainview.gov</u>. Thank you for your time and consideration.

Sincerely,

and HRive

Daniel H. Rich City Manager

DHR/7/MGR 614-07-17-18L

Enclosure

cc: City Council

SCE – Cervantes, PP, SP – Roche

6.2.1.3 Responses to Comments from City of Mountain View

- RA-MV-1 The County acknowledges the City's efforts to increase housing opportunities and its support of adding on-campus housing and related benefits. With respect to comments made regarding affordable housing, please see Master Response 10: Affordable Housing.
 RA-MV-2 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. Please see Response to Comment A-MV-2 for the County's response to this request.
 RA-MV-3 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. Please see Response to Comment A-MV-2 for the County's response to this request.
 RA-MV-3 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. Please see Response to Comment A-MV-2 for the County's response to this request.
 RA-MV-4 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. The Marguerite shuttle is a private shuttle system operated by
- of Draft EIR. The Marguerite shuttle is a private shuttle system operated by Stanford. The capacity and route planning is evaluated continuously and capacity is expanded when there is sufficient demand. For example, Stanford deploys as many shuttles as are needed to transport Caltrain riders to the campus based on the number of Caltrain riders who board shuttles during each hour. At the busiest times of day, multiple shuttles meet the same train to accommodate all campus riders who take that train. As Caltrain ridership is expected to grow during implementation of the 2018 General Use Permit, it is reasonable to expect that the number of shuttles would grow. Stanford also considers changes and expansions to Marguerite routes based on demand and effects on other transit providers. It is reasonable to anticipate that some expansion of Marguerite routes would occur during implementation of the 2018 General Use Permit; however, the location of such routes is unknown. Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.
- RA-MV-5 The County intends to make the Final EIR, including responses to comments, available to all interested parties at least 10 days prior to the first Planning Commission meeting at which the proposed project is considered.

Please note Comment Letter RA-MV contained an attachment consisting of the City's previously submitted comment letter on the Draft EIR (i.e., Comment Letter A-MV). This attachment to Comment Letter RA-MV is included in Appendix RA-MV in this Response to Comments Document. Please note that the original Comment Letter A-MV is responded to in Section 5.2.1.8 in this Response to Comments Document.



PLANNING & COMMUNITY ENVIRONMENT

250 Hemilton Averue Stil Floor Pala Alto, CA 94301 850 329 2441

July 24, 2018

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

Dear Mr. Rader,

Thank you for the opportunity to comment on the Stanford University 2018 GUP Recirculated Draft Environmental Impact Report (RDEIR).

The City of Palo Alto supports Stanford University's (University) academic interests and recognizes and appreciates the positive contributions, direct and indirect, that the region, and specifically, Palo Alto, receives from the University's location. And, we believe that Palo Alto's reputation for its excellent residential neighborhoods, pedestrian-oriented commercial districts, spirit of innovation, community parks and schools, likewise enhance the University's appeal when recruiting Stanford Affiliates¹.

Accordingly, these two entities and many of the surrounding communities, including the Santa Clara County, have shared interests ensuring any future University expansion adequately mitigates its impacts to surrounding communities. For Palo Alto, the RDEIR reveals that housing and transportation impacts are not adequately disclosed or mitigated, among other concerns.

Environmental Consequences of Off-Campus Housing (New Significant & Unavoidable Impact) The RDEIR recognizes for the first time that the Stanford 2018 General Use Permit (Project) will result in a significant unavoidable impact to housing. It also notes that Palo Alto is disproportionally impacted by the housing demand that is generated by the Project. The document, however, fails to anticipate how Palo Alto and surrounding communities would be impacted by this housing demand. There is reference to University records that suggest Palo Alto historically accounts for 19% of the University's off-campus housing units, but it is unclear if the County projects this ratio to the Project's future housing demand.

Rather than disclosing Project-related housing impacts in Palo Alto, the County suggests the City's own Comprehensive Plan accounted for the Project's population growth. This statement however, is unfounded and there is no evidence in the administrative record to support this assertion with respect to Palo Alto or the other surrounding cities. The Comprehensive Plan EIR's projections for cumulative growth in surrounding areas, for purposes of modeling traffic, air quality and greenhouse gas emissions, and noise, were sufficiently high to consider certain plans and projects including the Project's 3,150

¹ Includes students, faculty, staff, and other workers



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units/beds. However, at the time of certification, the City was unaware of the additional 2,342 housings units now being reported in the RDEIR to support Stanford Affiliates. The City's Comprehensive Plan anticipates a housing goal of up to 4,420 units through 2030. Citing the City's Comprehensive Plan and suggesting it anticipated this additional population growth is not only wrong, failure to disclose impacts renders the document inadequate under the California Environmental Quality Act (CEQA).

The RDEIR identifies one mitigation measure to address the description of the housing impact, which reads: <u>local agencies in which off-campus housing would be located *can and should* mitigate the <u>environmental impacts from off-campus housing</u> to the extent feasible. (Emphasis Added) This is not a satisfactory mitigation under CEQA and irresponsibly shifts the burden from the University to Palo Alto and surrounding communities to mitigate the housing impact. The University has the land and resources to mitigate housing-related impacts and the County can and should require greater analysis of how induced population growth will impact Palo Alto and to require mitigation measures that reduce this impact. Examples of some reasonable mitigation measures include the following:</u>

- Require all or a greater portion of Stanford Affiliate housing to be located on-campus near services and major transit
- For new academic and academic support facilities added within the City of Palo Alto's Sphere of Influence, require the University comply with the City's housing impact fee ordinance
- Phase new academic and academic support facilities to coincide with the University's construction of new housing units to accommodate anticipated housing needs

If the County determines recirculation is not required and pursues a Development Agreement with the University, as suggested by Robert Reidy, Vice President of Land, Buildings and Real Estate, in the July 23, 2018 edition of the Daily Post (page 8), City officials expect to have a role in negotiating outcomes with the County and University to represent Palo Alto interests.

Housing Alternatives: Traffic and Air Quality

The City appreciates the County's incorporation of the Housing Alternatives (Alternatives). The comments in this section relate primarily to Alternative A. The Alternative includes 2,342 additional on-campus housing units, but otherwise retains all other components of the Project. Operational emissions from the new housing units results in three new significant and unavoidable impacts related to air quality (PM₁₀). Ninety-four percent of these emissions are attributed to mobile sources.

The RDEIR provides an analysis that shows VMT will increase under the Alternative compared to the Project. Accordingly, the County finds that the Alternative will have greater impacts than the Project, result in greater VMT and worsen air quality. This comparative analysis is flawed, however, because the County has not conducted a similar review of the Project impacts associated with Stanford Affiliate off-campus housing. Instead of analyzing this impact, the County, as noted above, identified a new significant and unavoidable impact on the operation of off-site housing and stated this housing would result in unspecified off-site environmental impacts. Two of these impacts not specified and not disclosed or analyzed relates to VMT and air quality. The County asserts, in fact requires as a mitigation measure, that surrounding communities absorb the need for housing units generated by the Project. These housing units are principally located in Palo Alto, Menlo Park, and Mountain View. The University reports that nearly 30% of all off-campus housing is in these three communities. A small percentage is located on site, and the balance, is presumably distributed throughout the Bay Area. The County has not properly

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analyzed the VMT and air quality impacts of locating 2,342 additional housing units so far from the University campus in the Project. Any comparison between the Project and the Alternatives is meaningless and misrepresents the environmental impacts to decision-makers.

The RDEIR also notes concern that the University may not be able to achieve compliance with the No Net New Commute Trips (NNNCT) mitigation measure. While the City supports all efforts to reduce single occupancy trips and the University's efforts to reduce traffic to the campus core, the City remains concerned that NNNCT does not adequately address direct and indirect traffic-related impacts. The City reiterates its concerns regarding the methodology and feasibility of NNNCT specifically with respect to the lengthening of the peak period and definition of peak hours, direction of travel limitations, trip credits, and feasibility of mode split required to meet NNNCT standards. The City's traffic consultant's comments, dated November 13, 2017 and previously transmitted to the County during the DEIR comment period are hereby incorporated by reference.

By not identifying the true traffic-related impacts of the Project, the burden of responsibility shifts from the University to Palo Alto and surrounding communities. Not only is this not equitable, it is inconsistent with CEQA. Annually, the City has a National Citizen Survey prepared to gauge resident satisfaction in several topic areas. Since 2003, near the approval of the 2000 GUP, trendline data shows a steady drop in resident satisfaction on travel by car in Palo Alto, with citywide residents in 2017 reporting ease of travel by car as good or excellent at 42% - the lowest level in fourteen years of data collection. For residents nearest the University, this figure drops to 31%. Development under the 2000 GUP and, as proposed with the 2018 GUP, has placed a significant strain on the City's transportation network. The RDEIR for the first time begins to recognize these impacts in its Alternatives analysis, but does not identify these impacts for the Project and does not provide sufficient measures to mitigate these impacts.

While the City supports the concept behind NNNCT, it remains concerned that NNNCT does not fully account for traffic generated by the Project and is weak in identifying when mitigation measures would be employed. The University relies heavily on non-motorized trips to support its goals and the City encourages the following reasonable mitigation measures be required in an updated DEIR or included as conditions of approval:

- The University shall provide up front funding to improve the efficiency, capacity and reliability of Caltrain and the Palo Alto Inter-Modal Transit Center, including fair share contributions to Caltrain grade separation
- The University shall coordinate with the City of Palo Alto to support the City's Shuttle Program and enhance connections with the Marguerite Shuttle.
- Academic, academic support facilities and housing unit production within the City of Palo Alto's Sphere of Influence shall make fair share payments to the City in line with the City's Transportation Impact Fee requirements

Housing Alternatives: Aesthetics

The City supports increased housing density on campus land for the University to mitigate its housing impact. However, the notion that future housing must be up to 134 feet tall adjacent El Camino Real exaggerates the impact of placing housing in the identified locations. The City encourages the County to take a closer look at how and where housing could be placed so it respects and preserves the surrounding character. If such further analysis does not result in meaningful changes, it is difficult to support the

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conclusion based on information contained in the RDEIR that such housing would not degrade the existing visual character or quality of its surroundings. El Camino Real in Palo Alto has low profile buildings and construction contemplated in the Alternative would significantly alter the character of the street and by extension the character of Palo Alto. The need for modifications to the County's *Plan for the El Camino Real Frontage* to extend the height limit and reduce the building setback would have a dramatic impact on visual character and may impact scenic vistas. Clearly reasonable mitigation measures could be established that focus increases in height in locations most appropriate to accommodate it, building articulation, upper level setbacks and landscaping could be employed to minimize mass, and developing more site-specific regulations could be established to minimize impacts. Prior to adopting either Alternative, the City requests a more careful examination and mitigation of these potential impacts to Palo Alto. The DEIR should evaluate the placement of additional housing on campus in locations that would not impact the character of the surrounding area, for example, in more interior areas of the campus that are still outside of the academic core and where on-campus housing currently exists.

Housing Alternatives: Project Objectives

The County notes that the Alternative is not consistent with the Project objectives, which, in part, seeks to minimize potential negative impacts on the surrounding community; balance academic and academic support facilities with historical housing growth; and to prioritize the use of campus lands within unincorporated County land for academic space, students and faculty housing. The City supports efforts to minimize impacts to surrounding communities, but the RDEIR fails to disclose these impacts. Also, using the University's historic housing growth rates as a metric for future housing production artificially constrains housing development and pushes the burden to meet this need on adjacent jurisdictions. The City supports and appreciates the University's interests in cultivating a campus environment that focuses on education, student learning and discovery. The University has sufficient resources and land area to meet this objective and still off-set the impacts it generates.

Housing Alternatives: Public Services

Public Services include services provided to the University by the City of Palo Alto Fire and Police Departments. It should be noted that while the analysis of Fire Service assumes fire protection and emergency services from Palo Alto, these are contracted services with the University and will be reviewed periodically as development on campus occurs.

While the Santa Clara County Sherriff's Department provides on campus patrol for the University, the Palo Alto Police Department provides dispatch services for the campus. They also provide parking enforcement on city streets impacted by University construction workers. Increased campus housing may require mitigation to include an annual evaluation of calls for service from the University and, if applicable, contribution to off-set unanticipated demand on City resources.

PAUSD Impacts

The City values and supports the educational opportunities offered by the University and the Palo Alto Unified School District (PAUSD). PAUSD has identified undisclosed impacts to local schools and inadequacies of the RDEIR. The Palo Alto City Council encourages the County and University to work closely with PAUSD to address these concerns and ensure the District maintains its neighborhood enrollment standards. The impacts to PAUSD, new school sites and funding for increased enrollment, should be more clearly disclosed to the public in an updated environmental document. Unmitigated impacts to the school district is a significant concern to the City.

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Previous Comments on DEIR

The City, by reference herein, reiterates the comments it made on the DEIR on January 29, 2018.

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The City appreciates the time of County staff, its consultants, and the Board of Supervisors in their consideration of the above comments. If further clarification is needed, or when appropriate, there is time to meet and discuss Palo Alto's interest further, please contact me.

Sincerely, Ionathan Lait, AICP Interim Director

C:

Palo Alto City Council James Keene, City Manager Ed Shikada, Assistant City Manager Molly Stump, City Attorney Catherine Palter, Associate Vice President at Stanford Meg Monroe, Management Specialist

6.2.1.4 Responses to Comments from City of Palo Alto

RA-PA-1 The comment includes a general statement that the Recirculated Portions of Draft EIR reveal that housing and transportation impacts are not adequately disclosed or mitigated, among other concerns.

> Due to the lack of specificity in the comment, no specific response is possible. Please also see, however, responses to individual comments made below; as well as responses provided to Comment Letter A-PA in Section 5.2.1.

- RA-PA-2 The Recirculated Portions of Draft EIR does not, as suggested by this comment, recognize that the Project will result in a "significant unavoidable impact to housing." Rather, Impact 15.7-1 generally describes the unavoidable significant environmental impacts indirectly associated with construction of off-campus housing on the physical environment, while recognizing that the demand for offsite housing is an economic and social effect of a project. Data and analytic methods do not exist to predict with specificity how much off-campus housing demand would be met within the City of Palo Alto, or the precise locations, configuration and types of new housing that might be approved. The demand for 2,425 new off-site units that the Draft EIR calculates would occur under the proposed Project would be broadly distributed throughout the Bay Area over the next two decades. The Draft EIR provides reasonably available information as to the potential distribution of off-site housing associated with the proposed Project, and based on a review of representative EIRs (including the recently certified EIR for the City of Palo Alto's Comprehensive Plan), the Recirculated Portions of Draft EIR identifies the types of indirect impacts that may result from development of such housing. The purpose of the discussion in Recirculated Portions of Draft EIR Section 5.17-1 is to provide a general assessment of the potential indirect impacts of expanding the supply of housing in the Bay Area in response to future housing demand associated with the proposed Project to the extent it is feasible to do so. The discussion is not intended to provide an analysis of the direct or indirect environmental impacts of particular housing development projects. Such impacts are necessarily site- and project-specific, and an analysis of such impacts cannot reasonably be undertaken at this time. Please also see Master Response 10: Affordable Housing, Topic 1: Affordable Housing Need and Response to Comment RO-Goldfarb-3 for additional information about the analysis in Impact 5.17-1.
- RA-PA-3 It is not possible to precisely predict how much population and housing growth associated with the Project would be accommodated by Palo Alto and other jurisdictions. As recognized by the Draft EIR (p. 5.12-21), the housing increases anticipated to occur within each jurisdiction in which Stanford students and employees live would represent a small fraction of the total household growth projected for each jurisdiction. For the City of Palo Alto, this Stanford-related housing growth was estimated to account for 5.6 percent, or 367 out of the 6,590

new housing units forecast in the City of Palo Alto by 2040. ² (See Draft EIR page 5.12-18, Table 5.12-11.) The growth assumptions used to prepare local general plans, as well as the assumptions used by the Association of Bay Area Governments, are based upon general projections of increased employment and population growth; they are not based upon specific projections for each individual employer in the relevant region. Stanford is one of many entities that contributes to Bay Area employment growth. Under these circumstances, as the Impact 5.17-1 discussion recognizes, it is reasonable to assume that the general plans for nearby communities generally accounted for the population growth associated with Stanford affiliates residing within each respective jurisdiction. To the extent this assumption does not turn out to be true in the future, impacts of any additional off-campus housing would be similar to those described in Impact 5.17-1.

RA-PA-4 This comment commingles the socioeconomic impact of (1) the housing demand generated by the Project, and (2) the physical environmental impacts associated with meeting that housing demand. The Project's housing demand is a socioeconomic issue; it is not an environmental impact under CEQA. See Master Response 1: Non-CEQA Comments, Master Response 8: EIR Alternatives, Topic 1: CEQA Requirements for Alternatives, and Alternatives Evaluated in the EIR, and Master Response 10: Affordable Housing, Topic 1: Affordable Housing Need. See also the Response to Comment RO-Goldfarb-3.

> Mitigation Measure 15.7-1 reflects the fact that the County does not have the authority to mitigate environmental impacts associated with privately-initiated housing development in other jurisdictions, and CEQA does not grant the County such authority. See Public Resources Code Section 21004. Further, Mitigation Measure 5.17-1 recognizes the legal requirement that all cities and counties that consider and approve new housing must comply with CEQA's mitigation requirements, and this is so for both developments that might absorb some of the housing demand associated with the 2018 General Use Permit as well as any housing that might be supported by an affordable housing fund to which Stanford contributes. Specific mitigation measures cannot be developed in this EIR, and cannot be imposed in connection with the 2018 General Use Permit for undefined future housing projects that may be considered and approved in the future by any number of Bay Area jurisdictions, in currently unknown locations. Stanford affiliates may decide to live in any new or existing offsite housing built anywhere in the Project vicinity. For this reason, Mitigation Measure 5.17-1 recognizes that the agencies that consider and approve such projects in the future can and should require mitigation for their impacts, as they are required to do by CEQA. In this situation, CEQA allows the County to find that those mitigation measures are

² Palo Alto's projected household growth of 6,590 from 2015 to 2040 is referenced in Table 15 of Draft EIR Appendix PHD. The source for this growth (as noted in the table) is *ABAG's Projections 2013*, specifically page 98. Under the City's *Comprehensive Plan 2030*, growth is estimated between 3,545 and 4,420 new housing units by 2030. *ABAG's Projections 2013* estimated 3,950 households in Palo Alto in 2030.

6.2 Comments and Responses – Agencies

within the responsibility and jurisdiction of another agency, and that such measures can and should be adopted by such other agency. Guidelines Section 15091(a)(2).

The discussion of Impact 5.17-1 (beginning on page 2-7 of the Recirculated Portions of the Draft EIR) addresses the potential physical environmental impacts of off-campus housing demand. It recognizes that, given uncertainties in the specific location, configuration and type of off-campus housing, it is uncertain if feasible mitigation would exist to reduce all significant environmental impacts of those housing projects to a less-than-significant level. Further, the County cannot require or guarantee that local governments would implement mitigation measures for privately-funded off-campus housing included in their General Plan EIRs. For these reasons, the impact was determined to be significant and unavoidable.

Regarding the comment's specific suggested mitigation measures:

- Requiring more Stanford affiliate housing to be located on-campus: This option, which would reduce the Project's less-than-significant impact associated with inducement of off-campus population growth and cumulative contribution to off-campus population growth and increase some of the other off-campus impacts, was evaluated through two new alternatives in the Recirculated Portions of the Draft EIR: Additional Housing Alternatives A and B. Since this option was evaluated in the EIR alternatives analysis, evaluation of it as a mitigation measure would be redundant and unnecessary to meet CEQA requirements. In addition, CEQA does not require the County to adopt mitigation measures to further reduce impacts that the EIR concludes to be less than significant.
- Requiring Stanford to comply with the City's housing impact fee ordinance: While the payment of such fees would fund off-campus housing, the physical environmental impacts of off-campus housing would be similar regardless of whether such housing was funded by impact fees or other sources, with the possible exception that housing funded by impact fees might be closer to campus due to the 6-mile radius priority for disbursement of funds. Please see Master Response 10: Affordable Housing, Topic 5: Geographical Distribution of Affordable Housing Funds.
- Phasing new academic and academic support facilities to coincide with Stanford's construction of new housing units: Under the proposed 2018 General Use Permit, the development of academic and academic support space already would be linked to the development of housing units. See Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.
- RA-PA-5 Palo Alto's request to have a role in negotiating outcomes of the Development Agreement is noted.
- RA-PA-6 Significant impacts related to development of the proposed Project plus additional housing would occur under both the proposed Project and Additional Housing Alternatives A and B, though locations for and the degree of some significant

impacts would vary. With respect to VMT and air quality specifically, the Draft EIR considered the impacts of Stanford affiliates living in off-campus housing in relation to the impacts of the proposed Project. The analyses in Draft EIR Sections 5.2 Air Quality, 5.7 Greenhouse Gas Emissions and 5.15 Transportation and Traffic capture all reasonably foreseeable Project vehicle trips, and associated VMT and transportation-related air pollutant and greenhouse gas emissions, associated with Stanford affiliates and visitors traveling to the campus from off-campus locations.

Impact 5.17-1 presented in the Recirculated Portions of Draft EIR generally addresses the potential indirect impacts of new housing that may be constructed in the Bay Area to accommodate Stanford's off-campus housing demand. Impact 5.17-1 reiterates the point made in the Draft EIR that the Stanford-related households that would be located off-site "would likely be distributed among many jurisdictions in the Bay Area" and notes the possibility that future offcampus residents would "distribute in patterns similar to how current off-campus residents live." (Recirculated Portions of Draft EIR at p. 2-7.) Those patterns reflect a distribution among multiple jurisdictions throughout Santa Clara, San Mateo and Alameda counties and San Francisco. See Draft EIR Table 5.12-11. The Recirculated Portions of Draft EIR observes that the recent EIRs prepared by Palo Alto, Menlo Park, and Mountain View provide a representative analysis of the indirect impacts associated with housing construction and development that would more broadly occur among the Bay Area jurisdictions. In other words, Recirculated Draft EIR Section 5.17-1 summarizes expected indirect impacts of new housing development, in general, in these other Bay Area jurisdictions that could be affected by future regional housing demand, including Stanfordgenerated housing demand. See Recirculated Portions of Draft EIR at p. 2-12. The discussion identifies two types of significant and unavoidable indirect environmental impacts -- impacts to air quality and transportation -- and explains that those impacts should be common to other jurisdictions where housing growth will occur. These determinations are based on information that includes the significant and unavoidable air quality and/or transportation effects (Impact AIR-2 from the City of Palo Alto Comprehensive Plan Final EIR; Impacts AQ-2a, AQ-2b, and AQ-5 from the City of Menlo Park ConnectMenlo Final EIR; and Impacts AIR-2 and AIR-4 from the City of Mountain View 2030 General Plan Final EIR). Data and analytic methods do not exist to precisely predict what portion of these impacts would be indirectly "caused" by the proposed Project or the site-specific locations of these impacts.

Furthermore, as discussed in Response to Comment RA-PA-4, above, because it is not possible to predict the impacts of off-campus housing with specificity, it is similarly not possible at this point to develop more specific mitigation measures to reduce those impacts. Also, the County does not have the authority to mitigate or require other jurisdictions to mitigate impacts associated with privately-funded off-campus housing development in other jurisdictions. Please see Response to Comment RO-Goldfarb-3 for additional information regarding the analysis of Impact 5.17-1.

- RA-PA-7 Please see Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis conducted to address the impact of reverse-commute trips, and Topic 6: No Net New Commute Trips Standard for further explanation of the effectiveness of the no net new commute trips program, including the ability to expand the program to reduce more vehicle trips; as well as discussions of trip credits, average daily traffic, and peak-hour spreading. Please also see Responses to Comments A-PA-86 through A-PA-125 for specific responses to Hexagon's comments.
- RA-PA-8 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, there would be no burden imposed on surrounding communities and 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. If Stanford does not achieve the no net new commute trips standard, it will be required to contribute fair share funding for intersection improvements identified in the Draft EIR. The mitigation approach is intended to ensure that Stanford is responsible for its share of mitigation needed to address Stanford's effects on transportation.

Please also refer to Master Response 13: Transportation and Traffic, Topic 5: Intersection Impacts and Mitigation for a supplemental analysis conducted to address the impact of reverse-commute trips and 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.

- RA-PA-9 The information provided in the comment is noted.
- RA-PA-10 The Recirculated Portions of the Draft EIR analyzed traffic impacts for the alternatives based on the vehicle trips generated by proposed Project plus the increased on-campus housing contained in those alternatives using the same methodology as that employed in the Draft EIR to analyze the proposed Project. The same mitigation measures were applied to the alternatives as to the proposed Project. The comment does not provide information to substantiate the statement that, in comparison with the alternatives, impacts of the proposed Project have not been identified along with sufficient measures to mitigate these impacts.

Under Mitigation Measure 5.15-2, Stanford would be required to mitigate these impacts either by complying with the no net new commute trips standard or through the contribution of funding equivalent to Stanford's fair share of the cost

of improvements for adversely affected intersections.³ The County would monitor compliance with the no net new commute trips standard through cordon counts to determine if funding of intersection improvements would be required. Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for further discussion of this issue. 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 Stanford Community Plan establishes policies that provide Stanford flexibility to select specific transportation demand management (TDM) components for implementation, and that allow Stanford to modify its program based on changes in user needs and available services over time. (See, e.g., SCP-C 5). These TDM components could include support for improvements to transit infrastructure. Please also see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for further discussion of this issue.

Regarding fair share payments to the City in line with the City's Transportation Impact Fee requirements, these fair share payment requirements do not apply outside of the City's jurisdictional boundary. This is a matter for the County Board of Supervisors to evaluate when it considers the Project.

Regarding the comment's specific suggested mitigation measures:

- Requiring up-front funding for Caltrain, Palo Alto Transit Station and grade separation improvements: Please see Responses to Comments A-PA-80 to A-PA-82.
- Requiring Stanford to coordinate with Palo Alto to enhance Palo Alto's shuttle system and enhance connections to the Marguerite shuttle: Please see Response to Comment MV-4 for information about Stanford's Marguerite shuttle. The comment does not explain how enhancements to Palo Alto's shuttle system would reduce the impacts of the proposed Project; however, to the extent such enhancements would remove trips from the local impact area, this type of program could be considered by Stanford for the purpose of receiving trip reduction credits.
- Requiring Stanford to make fair share payments to the City of Palo Alto for new housing and academic development in an amount in line with City's Transportation Impact Fee requirements: Mitigation Measure 5.15-2(a) enables the County to collect a mitigation fee from Stanford, which is similar to the City's Traffic Impact Fee (TIF) program, in that the City's program also collects fees on a per vehicle trip basis to fund transportation

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

6.2 Comments and Responses – Agencies

improvements throughout the city. A key difference between Mitigation Measure 5.15-2(a) and the City of Palo Alto's TIF program is that the City's fee is paid in full at the time of project approval while under Mitigation Measure 5.15-2(a), the fee would be paid only to the extent growth in trips cannot otherwise be avoided, based on actual performance. The City fee is based on the trip generation rates in the Institute of Traffic Engineers Trip Generation Manual as determined by a project-specific traffic study at the time of a development application. Once the fee is paid, the project can then result in an increase in trips. Under the County's approach, Stanford would have an ongoing incentive to avoid paying a fee by ensuring that no growth in peak hour, peak direction trips occurs. It is only to the extent that Stanford does not achieve the no net new commute trips standard for commute-direction trips, that the fee would apply. Mitigation Measures 5.15-2(b) would require an upfront fair-share payment by Stanford to address the impact of peak-hour, offpeak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard.

RA-PA-11 The Recirculated Portions of Draft EIR did not assume that future housing must be up to 134 feet tall adjacent to El Camino Real. Rather, it assumed that additional on-campus graduate student or multi-family housing could range in height from 50 feet to 135 feet. (See page 2-60.) It also explained why the increased density associated with additional on-campus housing might lead to revisions to the El Camino Real Frontage Plan. No site-specific housing locations have been identified under the additional housing alternatives along or in the vicinity of El Camino Real, with the exception of the site at Quarry Road and El Camino Real.

> If new housing were to be proposed along El Camino Real in the DAPER and Administrative District, as noted on page 2-64 of the Recirculated Portions of Draft EIR, each individual building proposed under the Project would require submittal of an application to the County to determine if the project would require review under the County's Architecture and Site Approval (ASA) process. The ASA application would include information to assist the County in evaluating the project's potential impacts to views and visual quality/character. Visual simulations also could be required by the County to assist in the evaluation. The potential impact-reducing measures mentioned in the comment (e.g., building articulation, massing, upper level setbacks, landscaping) would be among the items reviewed under ASA for specific building projects in order to avoid or substantially lessen significant adverse visual impacts.

> The comment indicates the EIR should evaluate the placement of housing in more interior areas of the campus outside the academic core and where housing currently exists. This would include the Lagunita and East Campus Development Districts. With respect to Lagunita Development District, as discussed in the Recirculated Portions of Draft EIR, page 2-57 and 2-262, factors that would limit new housing in this district include constraints posed by the Stanford Habitat Conservation Plan. With respect to East Campus Development District, the

additional housing alternatives already assume substantial new housing would be developed in this district (2,267 new housing units under Additional Housing Alternative A, an increase of 667 units compared to the Project; and 1,841 new housing units under Additional Housing Alternative B, of an increase of 241 compared to the Project).

RA-PA-12 Housing Alternatives A and B were included in the Recirculated Portions of Draft EIR to help the public and decision makers understand the environmental implications of requiring Stanford to provide higher levels of housing associated with the Project if the County Board of Supervisors chooses to do so. Thus, whether these alternatives are consistent with all of Stanford's project objectives is not of primary concern. The impacts of these alternatives on the surrounding communities are addressed in the Recirculated Portions of Draft EIR. Please see responses to comment RA-PA-2, RA-PA-5, and RA-PA-6, above.

> A comment is made that the University's historical housing growth rate should not be used as a metric for future housing production as it artificially constraints housing development and pushes the burden to meet this need on the adjacent jurisdictions. Additional Housing Alternatives A and B would provide oncampus housing at a rate considerably higher than historical levels. As a result, the Recirculated Portions of Draft EIR accurately states (pages 2-258 and 2-460) that both Additional Housing Alternatives A and B would fail to achieve the University's primary stated Project objective to develop the campus in a manner that reflects Stanford's historical growth rates and the growth assumptions in Stanford's approved Sustainable Development Study, as well as not fully achieve other specific project objectives.

> A general comment is made that the Recirculated Portions of Draft EIR fails to disclose impacts to the surrounding communities. Due to the lack of specificity in these general comments, no specific response is possible. However, the Recirculated Portions of Draft EIR addresses all potential significant environmental impacts of additional housing alternatives, including to the surrounding community, and mitigates those impacts to the extent feasible. Please also see Responses to Comments RA-PA-2 through RA-PA-5, above.

RA-PA-13 The comment that the City of Palo Alto will periodically review its contracted services for fire protection and police (dispatching) services with Stanford as development on the campus occurs is noted. Please also see Response to Comment A-PA-10 in Section 5.2.1 in this Response to Comments Document which clarifies the status of Stanford's fire protection services contract with the City of Palo Alto. Increases in demand for service do not constitute an environmental impact under CEQA. Please also see Master Response 11: Public Services.

6.2 Comments and Responses – Agencies

Impacts of the Additional Housing Alternative A on the City of Palo Alto Fire Department and Police Department are addressed under Public Services in Recirculated Portions of Draft EIR in 7A.13-1, 7A.13-2, 7A.13-3, 7A.13-5 and 7A.13-6; and impacts of the Additional Housing Alternative B are addressed in 7B.13-1, 7BA.13-2, 7B.13-3, 7B.13-5 and 7B.13-6. All of these impacts were determined to be less than significant. See also Impact 7A.15-1 and 7B.15-1 in the Recirculated Portions of Draft EIR which determined that with implementation of construction traffic mitigation measures (including protection and maintenance of emergency service access and routes) impacts of these housing alternatives on emergency service access and mobility would be less than significant. In addition, Impact 7A.8-8, Impact 7A.8-9, Impact 7A.8-11, Impact 7A.8-12, Impact 7B.8-8, Impact 7B.8-9, Impact 7B.8-11 and Impact 7B.8-12 in the Recirculated Portions of Draft EIR determined that impacts of these housing alternatives on adopted emergency response and evaluation plans, and with risks involving wildland fires, would also be less than significant.

RA-PA-14 With respect to issues raised by PAUSD on the Recirculated Portions of Draft EIR, please see responses to Comment Letter RO-Goldfarb in Section 6.2.2 in this Response to Comments Document.

> See also Master Response 12: Public Schools, Topic 1: Student Generation Rate and Enrollment Forecasts, and Topic 2: Additional School Site. Please note also that state law establishes exclusive mitigation requirements for school impacts ("SB 50" school mitigation fees) and preempts local authority on this issue.

RA-PA-15 With respect to the comments made by the City of Palo Alto on the Draft EIR in its January 29, 2018 letter, please see responses to Comment Letter A-PA in Section 5.2.1 in this Response to Comments Document.

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TOWN of PORTOLA VALLEY

Town Hall: 765 Portola Road, Portola Valley, CA 94028 Tel: (650) 851-1700 Fax: (650) 851-4677

July 20, 2018

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

Re: Comments on the Recirculated Portions of the Stanford University 2018 General Use Permit

Mr. Rader,

Thank you for the opportunity to comment on the recirculated portions of Stanford University's Draft 2018 General Use Permit (GUP).

Background

We understand that the recirculated portions of the GUP introduce two new alternatives to the proposed project that add a requirement for additional levels of on-campus housing. We also understand that a new significant project impact has been added to the EIR as a result of the two new alternatives.

Comments

The Town shared its thoughts on the GUP during the initial comment period (Attachment 1) and continues to endorse that letter.

The Town is supportive of full consideration of the impacts any project may have on its neighbors, and the addition of the two new alternatives is appropriate as the full housing demand of the project as described was not addressed in the first draft GUP. The Bay Area in general, and Santa Clara and San Mateo Counties in particular, are suffering from a decades-old housing shortage that has been exasperated by dynamic and rapid job growth. As a result of this growth, housing costs have skyrocketed and traffic has greatly increased, which has resulted in both the loss of quality employees who can no longer afford to live in the region, and a negative change in the quality of life for those who remain.

By adding these two new alternatives, a direct link is established between job creation and housing need. The Town believes that this link is a critical step in the blend of solutions that will help address the housing crisis.

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As a neighbor to Stanford University that shares a common border, we understand that job growth on campus results in pressure for the Town of Portola Valley to accommodate increased housing needs. We believe it is appropriate for Stanford University to acknowledge the housing demand associated with their requested growth and to begin a community discussion, through the new EIR alternatives, of whether to site that housing primarily on Stanford owned property or off site.

Thank you for your consideration of this letter.

Sincerely,

Jeremy Dennis

Town Manager, Town of Portola Valley

cc: Mayor and Town Council

Attachment: December 14, 2017 GUP comment letter

6.2.1.5 Responses to Comments from Town of Portola Valley

- RA-PV-1 This general comment is acknowledged.
- RA-PV-2 With respect to the comments made by the Town of Portola Valley on the Draft EIR in its December 14, 2017 letter, please see responses to Comment Letter A-PV in Section 5.2.1 in this Response to Comments Document.
- RA-PV-3 The Town's support on this issue is acknowledged.
- RA-PV-4 The Town's perspective on this issue is acknowledged.

Please note Comment Letter RA-PV contained an attachment consisting of the City's previously submitted comment letter on the Draft EIR (i.e., Comment Letter A-PV). This attachment to Comment Letter RA-PV is included in Appendix RA-PV in this Response to Comments Document. Please note that original Comment Letter A-PV is responded to in Section 5.2.1.12 in this Response to Comments Document.

Comment Letter RA-SCVWD

5750 Almaden Expressway, San Jose, CA 95118-3614 | (408) 265-2600 | www.valleywater.org



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File: 33515 Various

July 26, 2018

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

Subject: Stanford University 2018 General Use Permit Draft Environmental Impact Report-Recirculated Portions

Dear Mr. Rader:

Santa Clara Valley Water District (District) has reviewed the recirculated portions of the Draft Environmental Impact Report (DEIR) for the Stanford University 2018 General Use Permit, received on June 18, 2018. The District is a special district with jurisdiction throughout Santa Clara County. The District acts as the county's groundwater management agency, principal water resources manager, flood protection agency and is the steward for its watersheds, streams and creeks, and underground aquifers.

We appreciate the opportunity to comment on the recirculated portions of the DEIR. This letter transmits comments that focus on the areas of interest and expertise of the District and supplements our letter dated February 2, 2018 on the DEIR.

Biological Resources

• Page 2-94—Mitigation Measure 7A.3-9(c)

Comment: The District recommends portions of this mitigation measure be revised to say "...Stanford shall obtain all appropriate regulatory permits or approval for work in jurisdictional waters (i.e. Waters of the State or Waters of the US), from applicable agencies, including but not necessarily limited to, the US Army Corps of Engineers, the San Francisco Bay Regional Water Quality Control Board, and California State Department of Fish and Wildlife. Any jurisdictional..."

Hydrology and Water Quality

Page 2-133 - Mitigation Measure 7A.9-1 and Page 2-337 – Mitigation Measure 7B.9-1

Comment: The SCVWD supports Mitigation Measure 7A.9-1 and Mitigation Measure 7B.9-1 to identify and properly destroy abandoned or inactive wells.

Mr. David Rader Page 2 July 26, 2018

 Page 2-136-Impact 7A.9-4 and Page 2-340-Impact 7B.9-4: "...However, based on a Water Supply Assessment (WSA) prepared by Stanford for the Additional Housing Alternative A (see Utilities and Service Systems below for additional detail), in single and multiple dry water year scenarios, Stanford would need to supplement its potable water supply (i.e., its guaranteed allocation of potable water purchased wholesale from San Francisco Public Utilities Commission) with treated groundwater from its wells in order to accommodate the estimated increase in potable water demand from the additional on-campus housing. Under all water year scenarios, the total groundwater demand for this alternative would not exceed 1.35 mgd (see Utilities and Service Systems, below, for additional detail). As discussed in Section 5.16, Stanford can withdraw up to 1.52 mgd from its wells without adversely affecting groundwater conditions. As a result, similar to the proposed Project, the projected groundwater use for this alternative could be safely withdrawn without causing excessive drawdown in the aquifer. Additionally, Stanford could implement more stringent water conservation measures beyond those implemented historically to further minimize increases in groundwater use..."

Comment: The conclusion on excessive drawdown appears to relate to the statement in the 2017 Water Supply Assessment (WSA Appendix, Page 20) that "unpublished internal groundwater modeling studies have indicated that Stanford (or others) could withdraw up to 1, 700 AFY (1.52 mgd) from its wells without impacting water quality in the aquifer or causing unacceptable impacts (e.g. excessive drawdown, land subsidence, saltwater intrusion)." Documentation should be provided to support this statement, or the statement should be removed as this pumping level exceeds projected groundwater demands presented in the WSA.

• Page 2-137-Mitigation Measure 7A.9-4 and Page 2-340-Mitigation Measure 7B.9-4: "...Stanford Utilities shall review individual projects proposed under the Additional Housing Alternative (A or B) for changes in impervious surface area within the Unconfined Groundwater Zone. The accounting of the recharge effort shall be tracked to ensure that all future development will continue to result in an annual net positive recharge in the Unconfined Groundwater Zone. Record of monitored data shall be submitted to the County on an annual basis and Santa Clara Valley Water District and include both water volumes and water quality data..."

Comment: The District supports Mitigation Measure 7A.9-4 and 7B.9.4 and appreciates being copied on the monitoring data.

• Pages 2-138 and 2-139-Impact 7A.9-6, Pages 2-341 and 2-342-Impact 7B.9-6:

Comments: In our February 2, 2018 letter on the DEIR, the District made comments on Section 5.9 and Impact 5.9-6 which is the section of the DEIR that the recirculated DEIR Impacts 7A.9-6 and 7B.9-6 discussion references as adequate mitigation. Our comments and concerns on these sections are the same as outlined in our DEIR letter with respect to the adequacy of measures to address increased runoff and the potential for increased flooding off-site.

Page 2-140 - Impact 7A.9-8 and Page 2-343 – Impact 7B.9-8: "...As discussed in Section 5.9, Hydrology and Water Quality, the Santa Clara Valley Groundwater Basin is not currently

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Mr. David Rader Page 3 July 26, 2018

> in an overdraft condition and is actively managed by the SCVWD which has recently submitted an application to serve as the Groundwater Sustainability Agency (GSA) for the basin in accordance with the Groundwater Sustainability Management Act..."

> Comment: The last part of this statement should be updated to include/reflect: "The Santa Clara Valley Water District is designated by DWR as the exclusive Groundwater Sustainability Agency for the Santa Clara Subbasin."

Pages 2-140-Impact 7A.9-9 and 2-344-Impact 7B.9-9: "...As discussed above, as with the proposed Project, this alternative would include structural measures designed to convey stormwater flows through improvements to existing infrastructure such that runoff volumes do not exceed existing flows during peak storm events. Therefore, this alternative, in combination with other cumulative projects, would not result in a significant cumulative impact to people and/or property from a 100-year event..."

Comment: Similar comment as our comments on Impacts 7A.9-6 and 7B.9-6. This discussion is not adequate to determine mitigation is not necessary. The terms "runoff volume" and "stormwater flows" or "existing flows" are not interchangeable; therefore, it is confusing to say the project will convey flows such that runoff volumes do not exceed existing flows. Additionally, the discussion only mentions cumulative impacts to people and/or property from a 100-year event. However, if the downstream flood conveyance facility does not have capacity to contain 100-year flows, then any additional increase in peak flows will increase flooding and any increases in runoff volume can similarly exacerbate downstream flooding conditions. The District recommends this section be revised to adequately demonstrate no mitigation is required.

We appreciate the opportunity to comment on the recirculated DEIR. We look forward to reviewing the Final Environmental Impact Report when it is prepared. If you have any questions, you may contact me at (408) 630-2319, or by e-mail at <u>varroyo@valleywater.org</u>. Please reference District File No. 33515 on future correspondence regarding this project.

Sincerely,

Yvonne Arroyo Associate Engineer Community Projects Review Unit

cc: M. Richardson, U. Chatwani, S. Tippets, Y. Arroyo, V. De La Piedra, L. Xu, M. Martin, A. Rouhani, File

6.2.1.6 Responses to Comments from Santa Clara Valley Water District

RA-SCVWD-1 The comment regarding requested clarification of Mitigation Measure 7A.3-9(c) is acknowledged. Please see Chapter 2 in this Response to Comments Document, for updated text in Mitigation Measure 7A.3-9(c) for Additional Housing Alternative A.

In addition, while not specifically requested in the comment, parallel revisions are also made in Chapter 2 in this Response to Comments Document for updated text in Mitigation Measure 7B.3-9(c) for Additional Housing Alternative B and in Mitigation Measure 5.3-9(c) for the proposed Project.

- RA-SCVWD-2 The comment that the SCVWD supports Mitigation Measures 7A.9-1 and 7B.9-1 to identify and properly destroy abandoned or inactive wells is acknowledged.
- RA-SCVWD-3 In 2016, Stanford completed an investigation of its sustainable groundwater pumping (Luhdorff & Scalmanini, 2016); see Appendix PMP in this Response to Comments Document. This technical report evaluated the sustainability of groundwater pumping as part of an overall strategy of integrating groundwater with local surface water and imported water to meet water requirements for Stanford. The report evaluated two pumping scenarios: 1) using groundwater to augment current sources of supply in all water years; and 2) short-term increased groundwater pumping in dry years to offset decreased local surface water and/or imported water availability. The report explained that the term "sustainability" is an operating condition under which groundwater levels are not chronically declining (indicative of groundwater overdraft) and not chronically depressed, such that either seawater intrusion, due to a gradient reversal for flow from San Francisco Bay, or subsidence would be induced.

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

As shown in Table 7A.16-2 in the Recirculated Portions of Draft EIR, the projected use of groundwater under the Project with Additional Housing

6.2 Comments and Responses – Agencies

Alternative A, similar to the proposed 2018 General Use Permit, would be 258 AFY (0.23 million gallons per day) under normal year conditions. This represents only 15 percent of the sustainable local pumping average of 1,700 AFY and leaves a remaining pumping amount of 1,442 AFY. The projected use of groundwater under the Project with Additional Housing Alternative A would be 1,087 AFY (0.97 million gallons per day) during single-year dry conditions and the first year of a multi-year drought, and 1,535 AFY (1.37 million gallons per day) under prolonged drought conditions. These temporary conditions are below the long-term sustainable pumping average of 1,700 AFY and are substantially below the 1- to 2-year drought figure of 5,000 AFY as discussed in the sustainable pumping report.

As shown in Table 7A.16-2 and Table 7B.16-2 in the Recirculated Portions of Draft EIR, groundwater demand under the Project with Additional Housing Alternative B under normal conditions would be same as the Project with Additional Housing Alternative A, and under first year or prolonged drought conditions would be even less than the Project with Additional Housing Alternative A.

As such, similar to the proposed Project, the projected groundwater use that would occur under the Project with either Additional Housing Alternative A or B could be safely withdrawn without causing excessive drawdown in the aquifer.

- RA-SCVWD-4 The comment that the SCVWD supports Mitigation Measures 7A.9-4 and 7B.9-4 is acknowledged.
- RA-SCVWD-5 Please see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities, Topic 2: Monitoring of Stanford's Detention Capacity, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event.
- RA-SCVWD-6 The comment is noted. Please see Chapter 2 in this Response to Comments Document, for the revised text to Impact 7A-9-8 and Impact 7B-9-8, similar to what was added in Chapter 2 for revisions to Impact 5.9-8.
- RA-SCVWD-7 Please see Master Response 7: Flooding/Detention, Topic 1: Development and Approval Process for Stanford's Existing Detention Facilities, Topic 2: Monitoring of Stanford's Detention Capacity, Topic 3: Capacity of Stanford Detention Facilities to Detain Runoff from Development Under Proposed 2018 General Use Permit, and Topic 4: Capacity of Stanford's Detention Facilities in Storm Events Less than 100-year Event.



STATE OF CALIFORNIA GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



EDMUND G. BROWN JR. Governor

July 27, 2018

David Rader Santa Clara County 70 W. Hedding Street 7th Floor, East Wing San Jose, CA 95112

Subject: Stanford University 2018 General Use Permit SCH#: 2017012022

Dear David Rader:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on July 26, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely.

maan

Scott Morgan Director, State Clearinghouse

Document Details Report Comment Letter RA-SC State Clearinghouse Data Base

SCH#2017012022Project TitleStanford University 2018 General Use PermitLead AgencySanta Clara County

Type EIR Draft EIR

Description Note: Recirculated

This document contains recirculated portions of the Draft EIR for the proposed Stanford University 2018 General use permit. For the purpose of comparison and to assist the public and decision-makers in understanding the implications of the construction of higher levels of housing on the Stanford campus beyond the 3,150 net new housing units/beds proposed by the project, two new alternatives to the proposed project are addressed in the recirculated portions of the draft EIR. Additional Housing Alternative B.

Additional housing alternative A assumes a general use permit would be modified to include the same level of academic and academic support development as the proposed 2018 GUP, but would include a requirement the Stanford provide additional housing equal to the increased housing demand generated by the proposed 2018 GUP. Additional housing alternative B also assumes a new general use permit would be sought for the same level of academic and academic support development as the proposed 2018 GUP, but would include a requirement that Stanford provide additional housing equal to half of the increased housing demand generated by the proposed 2018 GUP.

Lead Agency Contact

Lead Agend	cy Contact			
Name	David Rader			
Agency	Santa Clara County			
Phone	(408) 299-5779	Fax		
email				
Address	70 W. Hedding Street			
	7th Floor, East Wing San Jose	State CA	<i>Zip</i> 95112	
City	San Jose	State CA	210 93112	
Project Loc	ation			
County	Santa Clara			
City				
Region				
Lat / Long Cross Streets	Palm Dr and El Camino Real			
Parcel No.				
Township	Range	Section	Base	
Proximity to				
Highways	SR 82, I-280			
Airports	LIDDD. Coltrain			
Railways Waterways	UPRR, Caltrain San Francisquito, Matadero, Los Trancos, and Deer Creeks			
Schools				
Land Use	Academic campus, campus residential; campus open space, open space and field research, and			
	special conservation areas; Z: General use; low density res, medium density campus residential, open			
	space and field research; and general use			
Project Issues	Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Soil			
	Erosion/Compaction/Grading; Solid			
	Landuse; Cumulative Effects; Aesthetic/Visual; Agricultural Land; Drainage/Absorption; Economics/Jobs; Forest Land/Fire Hazard; Minerals; Sewer Capacity; Toxic/Hazardous; Vegetation;			
	Water Supply; Wetland/Riparian 6.2.1-42			

Note: Blanks in data fields result from insufficient information provided by lead agency.

Document Details Report Comment Letter RA-SC State Clearinghouse Data Base

Reviewing
 Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation;
 Agencies
 San Francisco Bay Conservation and Development Commission; Caltrans, Division of Aeronautics;
 California Highway Patrol; Caltrans, District 4; California Department of Education; Department of
 Housing and Community Development; Native American Heritage Commission; Public Utilities
 Commission; State Lands Commission; State Water Resources Control Board, Division of Drinking
 Water; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control

Date Received 06/12/2018 Start of Review 06/12/2018 End of Review 07/26/2018

6.2.1-43

Note: Blanks in data fields result from insufficient information provided by lead agency

6.2 Comments and Responses – Agencies

6.2.1.7 Responses to Comments from State Clearinghouse and Planning Unit

RA-SC-1 The comment notes compliance with the State Clearinghouse requirements for draft environmental documents, pursuant to CEQA. The comment also notes that during the State Clearinghouse's public review period, no state agencies submitted comments.

The comments are acknowledged.

COUNTY OF SAN MATEO BOARD OF SUPERVISORS

Board of Supervisors Dave Pine, 1st District Carole Groom, 2nd District Don Horsley, 3rd District Warren Slocum, 4th District David J. Canepa, 5th District County Goverment Center 400 County Center, 1st Floor Redwood City, CA 94063 650-363-4653 T 650-599-1027 F www.smcgov.org

July 24, 2018

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

SUBJECT: Recirculated Portions of the Draft Environmental Impact Report for Stanford University's 2018 General Use Permit Application

Dear Mr. Rader:

The above referenced document, which introduces two additional alternatives to the project that has been proposed by Stanford University (Stanford), exacerbates the concerns expressed by San Mateo County in our comments on the original Draft Environmental Impact Report (DEIR), and like the DEIR, inadequately addresses the environmental impacts that will be experienced in San Mateo County as a result of the proposed project and the alternatives contained in the Recirculated DEIR.

The recirculated DEIR's failure to address San Mateo County's prior comments, or to coordinate the selection and analysis of project alternatives with neighboring jurisdictions, has contributed to the deficiencies in the Recirculated DEIR and reflects poorly on Santa Clara County's respect for the very serious and legitimate concerns of its neighboring jurisdictions. It has put San Mateo County in the unfortunate position of having to vigorously challenge the adequacy of these environmental documents in order to ensure that the environmental impacts that will be experienced in this County are appropriately mitigated. We believe that the continuing inadequacies of the original and Recirculated DEIR must be addressed in a supplemental environmental document that will be open to public review and comment before a Final EIR is published.



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The alternatives contained in the Recirculated DEIR increase, to varying degrees, the amount of housing to be provided on campus, and also provides Stanford with the option to provide these residential units off-site. The Recirculated DEIR does not state how or why the County selected and pursued further consideration of these two additional project alternatives. If the objective is to identify options that minimize the project's significant impacts on transportation and housing, San Mateo County believes that this objective would be better achieved by pursuing a phased, incremental approach to campus development, as suggested in our January 26, 2018 comments to the original DEIR.

We believe that, overall, the recirculated portions of the DEIR are a missed opportunity to respond to the significant issues that San Mateo County and others raised in our comments on the original DEIR. Instead of responding to such concerns, the recirculated DEIR exacerbates our concerns regarding the project's impacts on San Mateo County, and raises new issues that require additional study and clarification, as detailed below.

I. Housing Impacts

San Mateo County is glad to see that the recirculated portions of the DEIR recognize the significance of the project's housing impacts. However, we disagree with the recirculated DEIR's characterization of these impacts solely as physical impacts associated with off-campus housing (Impact 5.17). The project's impact on housing, which remains unrecognized by the environmental reviews conducted to date, includes the fact that the increased demand for housing caused by the expanded Stanford student, faculty, and affiliate population will severely reduce the already inadequate supply of housing that is affordable to low and moderate income families and individuals.

Allowing Stanford to elect to provide the number of housing units required by the new alternatives at any off-site location, and to locate affordable off-site housing "within one half mile of any major transit stop or a high quality transit corridor¹ in the Bay Area" (p.2-7 of the Recirculated DEIR) significantly diminishes the ability of this measure to effectively mitigate the impact of the project on housing in San Mateo County. We are similarly concerned that the six-mile radius in which affordable housing would be constructed, as described on pages 2-254 for Alternative A and on page 2-259 for Alternative B, does not provide assurance that the housing impacts experienced within San Mateo County will be adequately mitigated. As detailed in our comments on the DEIR, it is essential that Santa Clara County recognize the direct and significant impacts that Stanford's growth has on San Mateo County, particularly on San Mateo County's housing supply. The assumption that these impacts can be reduced in any meaningful way by constructing housing anywhere within the Bay Area, or within a six-mile radius, under

¹ It is also problematic that the Recirculated DEIR does not define "major transit stop" or "high quality transit corridor," and San Mateo County requests that these terms be defined and that analysis be performed in light of such definitions.

an ill-defined methodology that provides little to no involvement by San Mateo County, is both incorrect and contrary to the need for the project to mitigate its impacts on San Mateo County. Cont.

To this end, we previously requested more detailed information regarding the process that will be used to distribute the affordable housing funds that Stanford will provide under the proposed project. Unfortunately, the recirculated DEIR did not provide any such clarifications, and instead uses the same discussion contained in the original DEIR. Thus, the comments we previously provided in this regard also apply to the new alternatives and revised Chapter 5.17 and are hereby incorporated into this letter by reference. Please also clarify how the affordable housing funds will be distributed in the event that one of the two new alternatives is selected.

II. Transportation Impacts

The recirculated portions of the DEIR conclude that providing the housing needed by Stanford students, faculty, and other staff on campus will result in greater impacts on transportation and circulation than under the proposed project, which provides significantly less on-campus housing than the amount proposed under the two new alternatives in the recirculated DEIR. The asserted basis for this conclusion is that campus residents would take more trips than people who commute to the campus for education or employment purposes.

In general, we believe that this analysis has a much broader application, and should be applied equally to the proposed project. That is, if the need for housing is not met on-campus, as is the case with the proposed project, the residential trips associated with a growing population will still occur. The only difference between the new alternatives and proposed project is that the location of the departure and destination will change. As detailed by our comments on the DEIR, the proposed project will have localized impacts on streets and neighborhoods within San Mateo County that have not been adequately identified and addressed. Without such analyses, it is inappropriate to conclude that transportation impacts within San Mateo County will be worse if the needed units are constructed on campus, as opposed to elsewhere within the region.

Like the DEIR, the recirculated DEIR has not adequately identified the specific impacts that will be experienced within unincorporated communities of San Mateo County, such as North Fair Oaks, West Menlo Park, Menlo Oaks, Stanford Weekend Acres, and the roadways upon which these communities rely. From the intersections that have been evaluated, intersections #24 (Alpine Rd and I-280) and #59 (Middlefield and Marsh) are of special concern.

With regard to the intersection at Alpine and I-280, the recirculated DEIR makes the unsubstantiated claim that there will be an improvement to operations due to reduction of commuter traffic. While the new alternative allegedly reduce the use of this intersection by students and employees/students of Stanford, the intersection will likely face increased use by family members and others residing in these proposed alternative housings that commute to and from elsewhere in County, rendering the trip distribution, as proposed, unreasonable. San Mateo County requests additional analysis of this interchange based on more realistic

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assumptions to fully evaluate any impact the proposed project and the new alternatives may 10 have, and to develop and implement the necessary mitigation measures. cont. With regard to the intersection of Middlefield and Marsh, the recirculated DEIR indicates that mitigation measures may not happen in time to address the impact of the two new alternatives, and that the impacts will therefore be remain significant and unavoidable. This intersection experiences congestion during peak hours today and any additional impacts at this 11 intersection will affect unincorporated San Mateo County communities in North Fair Oaks and Menlo Oaks. Greater attention to how these impacts can be avoided and mitigated must be provided in order to prevent the project from creating undue hardships on San Mateo County residents. We also have serious concerns about the impacts of the alternatives introduced by the Recirculated DEIR, as well as that of the proposed project, on traffic, circulation, and bicycle and pedestrian safety along portions of Santa Cruz Avenue, Alameda de las Pulgas, and Alpine Road, 12 within the unincorporated San Mateo County neighborhoods of West Menlo Park and Stanford Weekend Acres. A more detailed analysis of the specific impacts posed to these community from increased Stanford commuter and construction traffic, and greater specificity about how these impacts will be mitigated, should be provided. The recirculated DEIR also does not clearly define what specific pedestrian and bicycle improvements are to be implemented in conjunction with the new alternatives. San Mateo County requests that Stanford participate and contribute to safety improvements and bike lane 13 gap closures in the Santa Cruz Avenue corridor from Sand Hill Road north through Alameda De Las Pulgas to minimize impact on congestion and improve safety. Similar to the DEIR, the recirculated DEIR has made some unreasonable assumptions with regards to calculation of Vehicle Miles Traveled (VMT) in counting the undergraduate population as part of the calculation. This has significantly reduced any VMT impact of the 14 project in an artificial manner. San Mateo County requests that VMT calculations be re-done with more accurate representation of the population in the per capita calculations. Like the proposed project, the alternatives studied by the recirculated DEIR will have significant and unavoidable impacts on transportation. The questions and issues we raised regarding these impacts in our comments on the DEIR are applicable to the alternatives contained in the recirculated DEIR and are incorporated within this letter by reference. For example, San Mateo 15 County reiterates its expectation to be involved and to have a representative in any oversight committee established by Santa Clara County to monitor the mitigation and fund distribution for this project. It is unfortunate that no effort was made to respond to or clarify these comments within the recirculated DEIR. Finally, we note our concern about the significant and unavoidable transportation impacts that will be incurred by allowing Stanford to construct non-affordable units under the new 16 alternatives anywhere within the Bay Area. These impacts underscore the importance of

evaluating project alternatives that do not provide Stanford the unqualified option to provide housing off-campus, and that provide greater detail regarding the method for mitigating the transportation impacts of whatever alternative is selected, as described by our comments on the DEIR.

We urge Santa Clara County to give the above comments the consideration they deserve, and to cease conducting its analyses in isolation. The California Environmental Quality Act requires that the impacts of this large scale and long term project be thoroughly analyzed and mitigated, regardless of where the impacts fall. Coordinating this review with neighboring jurisdictions is not only needed to comply with CEQA, but is consistent with courtesy and comity principles that we would expect Santa Clara County to honor. To this end, Santa Clara County should engage with San Mateo County in crafting a supplemental environmental review document that fills the significant gaps in the reviews that have been conducted to date, and that provides the public with additional opportunity to review and comment on this supplemental analysis.

In any event, San Mateo County will continue to monitor and participate in the project review process, and will evaluate all available options to ensure that the substantial impacts of the proposed project on the County will be properly addressed and mitigated. If you have any questions regarding the content of this letter, please contact the San Mateo County Community Development Director, Steve Monowitz, at <u>smonowitz@smcgov.org</u> or (650) 363-1861.

Sincerely, on behalf of the San Mateo County Board of Supervisors,

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Dave Pine District 1 Supervisor and President of the San Mateo County Board of Supervisors 16

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6.2 Comments and Responses – Agencies

6.2.1.8 Responses to Comments from County of San Mateo

RA-SMC-1 The comment contains general statements that the new housing alternatives exacerbate the concerns expressed by San Mateo County on the original Draft EIR, and would inadequately addresses the environmental impacts that would be experienced in San Mateo County; that the Recirculated Portions of the Draft EIR fails to address San Mateo County's prior comments or reflects coordination with neighboring jurisdictions; and that a supplemental environmental document open to public review is required to address inadequacies of the Draft EIR and Recirculated Portions of Draft EIR.

> Due to the lack of specificity in the comment, no specific response is possible. However, each of the specific issues raised by the comments in this letter are addressed in the individual responses to the comment, below; as well as responses provided to Comment Letter A-SMC in Section 5.2.1. See also Master Response 4: Environmental Review Process, Topic 2: EIR Recirculation.

> Please note that the purpose of the Recirculated Portions of Draft EIR document was to describe the two additional housing alternatives, evaluate their impacts, and describe an additional significant Project impact (Impact 15.7-1). The purpose of this document was not to comprehensively address and respond to all comments on the original Draft EIR; such responses are comprehensively presented in this Final EIR.

- RA-SMC-2 As stated on page 2-53 under the description of Additional Housing Alternative A and page 2-258 under the description of Additional Housing Alternatives B in the Recirculated Portions of Draft EIR, the additional housing alternatives were included to assist the public and decision-makers in understanding the implications of the construction of higher levels of housing associated with the Project, as suggested by some Draft EIR commenters, and to offer the County the option of selecting one of these alternatives. Please refer to Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives for a discussion of a phased approach.
- RA-SMC-3 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. The comment contains some of the same general statements in Comment RA-SMC-1, above.

Due to the lack of specificity in the comment, no specific response is possible. However, each of the specific issues raised by the comments in this letter are addressed in the individual responses to the comments that follow; as well as responses provided to Comment Letter A-SMC in Section 5.2.1.

RA-SMC-4 Please see Master Response 9: Population and Housing Methodology and Calculations, Topic 3: Off-Campus Households and Household Adjustment Factors. The County does not disagree that the Project has the potential to impact housing supply; however, this housing impact is a socioeconomic issue that is not a physical environmental impact under CEQA.

- RA-SMC-5 Proposals by Stanford to provide affordable housing units at off-site locations would be subject to applicable approvals. For the purposes of the Recirculated DEIR analysis, it was assumed that such off-site affordable housing would be within a six-mile radius of the campus because this is the current requirement for expenditure of Stanford's in-lieu housing fees. However, these and other requirements related to affordable housing are policy decisions that will be made by the County Board of Supervisors at the time the proposed Project is considered. As noted in response to RA-SMC-4, the impacts of the Project on housing supply is a socioeconomic issue that is not a physical environmental impact under CEQA. Please also see Master Response 10: Affordable Housing, Topic 4: Process for Distribution of Affordable Housing Funds, and Topic 5: Geographical Distribution of Affordable Housing Funds
- RA-SMC-6 This comment does not pertain to new issues raised in the Recirculated Portions of Draft EIR. The use of funds in the Stanford Affordable Housing Fund is determined by the County Board of Supervisors based on adopted procedures for disbursement of the fund. The use of funds within the Stanford Affordable Housing Fund is a socioeconomic issue not required to be analyzed under CEQA.

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

- RA-SMC-7 The comment summarizes the analysis of Affordable Housing Alternatives A and B and is acknowledged.
- RA-SMC-8 Beginning on page 2-7, the Recirculated Portions of Draft EIR provides a general assessment of the potential indirect impacts of expanding the supply of housing in the Bay Area in response to future housing demand to the extent it is feasible to do so. The recent General Plan EIRs for the cities of Palo Alto, Menlo Park, and Mountain View are used to identify the types of impacts that may occur. Please see Response to Comment RA-SCOPE-4 for an explanation why it would be speculative to calculate how trip characteristics of other household members would change if additional housing for Stanford affiliates were provided on campus rather than distributed to locations off-site. With respect to the commenter's previous comments on the Draft EIR's assessment of potential impacts on streets and neighborhoods within San Mateo County, please refer to Responses to Comments A-SMC-4 through A-SMC-8 and A-SMC-10 through A-SMC-25. Also, please see Response to Comment RA-PA-6 for a discussion of why the traffic impact analyses for the proposed Project and the additional housing alternatives are consistent.

- RA-SMC-9 Beginning on page 2-173 (Additional Housing Alternative A) and 2-376 (Additional Housing Alternative B) of the Recirculated Portions of Draft EIR, the potential Transportation and Traffic impacts of the additional housing alternatives are discussed, including Intersections #24 and #59. With respect to the commenter's previous comments on the Draft EIR's assessment of impacts on transportation facilities in unincorporated San Mateo County, please see Response to Comment A-SMC-2.
- RA-SMC-10 With both additional housing alternatives, the traffic volumes at the Alpine Road/I-280 ramp intersections are predicted to change slightly due to the combination of decreased commuter trips and increased residential trips, and the different trip distributions for these two types of trips, as documented in the Draft EIR (see Figures 5.15-6 and 5.15-7). The resulting delays at these intersections are projected to drop by less than a second in certain cases and increase by less than a second in other cases. No significant Project impacts were identified for these intersections in the Draft EIR, nor are any significant impacts identified at these intersections for the additional housing alternatives.

Please note the peak hour delays for the Cumulative (2035) With Additional Housing Alternative A at Intersection #23 (I-280 Southbound Ramps/Alpine Road) were incorrectly reported in Table 7A.15-11 of the Recirculated Portions of Draft EIR. The correct delays are 47.4 seconds in the AM peak hour, and 16.8 seconds in the PM peak hour. Please see Chapter 2 in this Response to Comments Document for corrections made to Table 7A.15-11.

RA-SMC-11 The finding noted in the comment is the same as the finding for the intersection of Middlefield and Marsh Roads (Intersection #59) in the Draft EIR for the proposed Project. In both cases, the analysis in the Draft EIR is based upon the worst-case assumption that Stanford is unable to expand its transportation demand management programs to achieve the no net new commute trips standard. At intersections where a significant impact would occur under this assumption, the Draft EIR identifies physical improvements that would reduce the impact to a less-than-significant level if fully funded and timely implemented.

The intersection at Middlefield and Marsh Roads (Intersection #59) is where the Project would contribute to a cumulative impact, and where the intersection improvements are not within the County of Santa Clara's control. The Draft EIR explains why it is uncertain whether Menlo Park would construct the intersection improvements in a timely manner.

Mitigation Measure 5.15-2 in the Draft EIR does not rely exclusively on physical intersection improvements to mitigate this impact.⁴ The Recirculated Portions of

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.

Draft EIR Mitigation Measures 7A.15-2 and 7B.15-2 describe the approach to mitigating the off-campus traffic impacts of Additional Housing Alternatives A and B, which is the same as the proposed approach to mitigating the off-campus traffic impacts of the proposed Project. Under that approach, the County establishes the no net new commute trips standard, which is a measured performance standard. As indicated in the Stanford Community Plan, the County's policy preference is that Stanford first make all reasonable attempts to get commuters out of their cars and that physical improvements to intersections occur only if those trip-reduction efforts are not successful. If Stanford successfully achieves the no net new commute trips standard, the intersection would not be significantly impacted by Project-related vehicle trips, and the proposed Project would have a less-than-significant impact on the intersection. This would avoid the impact, and any associated hardship on San Mateo County residents. If Stanford does not achieve the no net new commute trips standard, Mitigation Measure 5.15-2 provides for collection of a fair share contribution that can be applied to the physical intersection improvements identified in the Draft EIR or to other programs that take cars off the road.

It should be noted that Mitigation Measures 5.15-2, 7A.15-2, and 7B.15-2 have been expanded to include an up-front fair-share payment by Stanford to address the impact of peak-hour, off-peak direction Project-generated vehicle trips (i.e., reverse commute) that are not accounted for in the no net new commute trips standard. Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

RA-SMC-12 Please see Response to Comment RA-SMC-9.

RA-SMC-13 Under the proposed Project and Additional Housing Alternatives A and B, 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. 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. Specifically, see page 8-8 of the Draft EIR, which describes that Stanford would provide funding toward the mobility project on Alameda de las Pulgas that San Mateo County is currently studying.⁵ Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.

> If Stanford does not achieve the no net new commute trips standard, the County of Santa Clara would collect funding from Stanford for one or more improvements to intersections identified in the Draft EIR. If the use of the funds for intersection improvements is infeasible, the County would use the funds for

⁵ See https://publicworks.smcgov.org/santa-cruz-avenue-corridor-study.

other trip reduction programs in the local impact area, such as additional bicycle facility improvements in neighboring cities.

- RA-SMC-14 Please see Response to Comment A-SMC-27.
- RA-SMC-15 Please see responses to comments to Letter A-SMC for responses to all comments related to transportation that the reviewer submitted on the Draft EIR.
 Please see Response to Comment A-SMC-31 regarding the Community Resource Group, which participates in mitigation monitoring activities.
- RA-SMC-16 The Recirculated Portions of Draft EIR assumed that under Additional Housing Alternative A, the full Project off-site housing demand would be met by Stanford constructing additional on-campus housing; and that under Additional Housing Alternative B, half the Project off-site housing demand would be met by additional on-campus housing. However, the Recirculated Portions of Draft EIR also acknowledge that if the County were to require Stanford to construct additional housing, Stanford might be allowed to offset the incremental off-campus housing demand by providing off-campus housing. The County Board of Supervisors will ultimately determine whether to require Stanford to provide additional housing and how much, if any, of this housing may be located off-campus.

The Draft EIR and Recirculated Portions of Draft EIR also acknowledge that Stanford proposes that its affordable housing fees support development of affordable housing outside the current 6-mile radius if the housing is within onehalf mile of a major transit stop or a high-quality transit corridor as defined by SB 375. Use of affordable housing fees is a policy decision that will be decided by the County Board of Supervisors prior to considering Project approval.

RA-SMC-17 The comments from the County of San Mateo will be considered by the County of Santa Clara decision-makers. The environmental review process for this Project has not been conducted in isolation. The County has provided multiple opportunities for agency and public input to date, including responding to the Notice of Preparation during the 30-day scoping period, submitting comments during the 120-day public review period for the Draft EIR, and submitting comments during the 45-day public review period for the Recirculated Portions of Draft EIR. Seven public meetings were held in Palo Alto and Menlo Park to receive oral comment on the Draft and Recirculated Portions of Draft EIR. In addition, the County held a number of other public outreach meetings with various adjacent jurisdictions regarding the proposed General Use Permit and EIR. After public release of the Final EIR, the County will provide additional opportunities for agency and public involvement prior to considering Project approval.

See also Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals, and Topic 2: EIR Recirculation.

RA-SMC-18 The comment is acknowledged.