

6.2.3 Recirculated Portions of Draft EIR Comment Letters – Individuals

Comment Letter RI-Achler

From: Isaac@ITOPcorp.com
To: [Rader, David](#)
Cc: joseph.simitian@bos.sccgov.org; [Prior, Christine](#); [Hellman-Tincher, Micaela](#); greg.scharff@cityofpaloalto.org; gregscharff@aol.com; [Tom DuBois](#); tom.dubois@cityofpaloalto.org; eric.filseth@cityofpaloalto.org; Adrian.Fine@cityofpaloalto.org; cory.wolbach@cityofpaloalto.org; karen.holman@cityofpaloalto.org; liz.kniss@cityofpaloalto.org; greg.tanaka@cityofpaloalto.org; [Greg Tanaka](#); Lydia.Kou@cityofpaloalto.org
Subject: Comments on the Stanford DEIR
Date: Thursday, July 19, 2018 5:09:36 PM

19 July 2018

Stanford Proposed 2018 Expansion (2.3 million sqft)

versus

Bay Area's Monstrous / Dangerous Traffic Pollution

Stanford proposed 2018 expansion plan of 2.3 million sqft should only be approved **after** first **solving** the huge congested **traffic** and its harmful air pollution problems in the **Bay Area** !!! Solutions include creation of **public transportation** (BART , High Speed Trains , Buses and Taxis) that will **reduce millions of cars** that are congesting , clogging and choking the roads , and are polluting and sickening the population of Palo Alto , the Bay Area and Planet Earth !!!

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

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

Isaac Achler

[Redacted signature block]

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6.2.3.1 Responses to Comments from Isaac Achler

RI-Achler-1 These comments are acknowledged; however, they do not address issues raised in the Recirculated Portions of Draft EIR. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

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

Comment Letter RI-Beer

From: [REDACTED]
To: [Rader, David](#)
Subject: Stanford housing plan not enough for new development planned
Date: Thursday, July 26, 2018 1:43:48 PM

Dear Stanford,

As a resident of Palo Alto for over 30 years, I am extremely upset by the huge increase in traffic in my neighborhood near Stanford in the past few years, largely due to incessant building of office complexes. As a renter, I am in constant fear of having to leave my long-term apartment due to this excessive development. I believe that Stanford's development plan will greatly increase the demand for housing in Palo Alto, making renters like me suffer even more. It will also make a terrible traffic situation even worse.

Please scale back on your massive development plan and make sure that housing will be available on the campus so that we renters in Palo Alto will not suffer from your building expansion.

Thank you.

Sincerely,

Julie Beer

[REDACTED]
[REDACTED]

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6.2.3.2 Responses to Comments from Julie Beer

RI-Beer-1 The comments are acknowledged; however, they do not address issues raised in the Recirculated Portions of Draft EIR. Please see Master Response 3: General Comments on EIR and Environmental Topics.

However, please also see Draft EIR Section 5.12 Population and Housing and Section 5.15 Transportation and Traffic which address all Project and contribution to cumulative impacts on housing and traffic associated with the construction and operation of the proposed Project. In addition, Sections 7.4.4 and 7.4.5 of the Recirculated Portions of Draft EIR, which evaluate two additional alternatives—Additional Housing Alternative A and Additional Housing Alternative B—that could fully or partially fulfill the Project’s housing demand on campus.

Comment Letter RI-Blevins

From: [Pat Blevins](#)
To: [Rader, David](#)
Subject: Stanford's Proposal
Date: Wednesday, July 25, 2018 4:01:53 PM

Mr. Rader,

I retired from Stanford in 2010 after 22 years of working in the Student Health Center as a Nurse Practitioner. I know first hand the number of graduate students who lived in their cars, routinely moving their parking places during the night in order to escape campus police. These young people only wanted an excellent education but in order to achieve that education they were forced to live in poverty and be homeless by the uncaring institution of "higher learning" that is Stanford. Even the construction of graduate student housing, ie the Munger building, which was meant to solve the graduate student housing problem failed because of the high rents required by the University of their impoverished graduate students, many earning only \$10,000 per year.

Now I understand Stanford wants to enlarge its campus bringing some 8,000 additional students and employees onto the already overcrowded campus which has ruined the Palo Alto neighborhoods surrounding the campus and destroyed the residents quality of life. The increased traffic is already intolerable up both Hwy 101 and Hwy 280. The highways are at grid lock now, how will they handle the increased traffic for all these employees?

Where will all the added students live? Will there be affordable housing for them? Will the campus provide mass transit options for people trying to get to work using Hwy 101 and 280?

Addressing all the issues the University intends to create will mean undertaking a task that we as a region have avoided before now. We have failed to ask ourselves the hard questions: what is the actual carrying capacity of our region? What are the limits in terms of water supply and infrastructure? What will be the effects to our quality of life if we actually build out all the development Stanford proposes in both of its proposed plans? Only if we begin asking these questions will we face up to the problems that Stanford's "grow-grow-grow" attitude has created.

It's time to start asking these hard questions and to insist that Stanford start figuring out the answers before blowing up what is left of their campus, the city of Palo Alto and our commute corridors.

Patricia Blevins
San Jose, Ca.

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6.2.3.3 Responses to Comments from Patricia Blevins

- RI-Blevins-1 The comments are acknowledged; however, they do not address issues raised in the Recirculated Portions of Draft EIR. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.
- RI-Blevins-2 The comments are acknowledged; however, they do not address issues raised in the Recirculated Portions of Draft EIR.
- RI-Blevins-3 The comments about affordable housing are acknowledged. Additional Housing Alternatives A and B, respectively, were included in the Recirculated Portions of Draft EIR to help the public and decision-makers understand the implications of providing higher levels of housing associated with the Project, as suggested by some Draft EIR commenters, and to offer the County Board of Supervisors the option of selecting one of those alternatives. With respect to the potential location of this housing on campus, as described on page 2-57 of the Recirculated Portions of Draft EIR, additional graduate student beds would be located in the East Campus Development District. Additional postdoctoral students may be located in the Quarry, East Campus, DAPER and Administrative, or West Campus Development Districts (see page 2-59). Table 5.12-11 in the Population and Housing chapter of the Draft EIR (pages 5.12-18 and 5.12-19) provides information about the off-site locations where household growth is anticipated to occur under the proposed Project. Additional information can be found in Draft EIR Appendix PHD, including the breakdown of off-campus growth projections by graduate students, postdoctoral students, faculty and staff. Under the proposed Project and under the additional housing alternatives, the anticipated increase in undergraduate students would be housed on the Stanford campus. Under the proposed Project, the Draft EIR predicts a net increase of 210 graduate students living off campus, which equates to 83 households. The Recirculated Portions of Draft EIR studies the effect of moving all 210 graduate students onto the campus under Additional Housing Alternative A, and moving 105 graduate students onto the campus under Additional Housing Alternative B. Please also see Master Response 10: Affordable Housing.
- RI-Blevins-4 The primary mitigation for the Project's transportation impacts is the no net new commute trip standard. Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard. There are many tools available for Stanford to move drivers from single-occupancy vehicles to other modes of transportation. In the future, Stanford could choose to provide additional bus service that would utilize US 101 and I-280, either by funding increased service provided by public transit providers or by running its own buses.
- RI-Blevins-5 The comments are acknowledged; however, they do not address issues raised in the Recirculated Portions of Draft EIR.

RI-Blevins-6 The comments are acknowledged; however, they do not address issues raised in the Recirculated Portions of Draft EIR. Comments inquiring about the carrying capacity of the region are outside of the scope of this EIR. However, the EIR addresses all Project and cumulative environmental impacts, as appropriate. Please see Master Response 2: Non-Project Planning Process, Topic 1: Sustainable Development Study as it relates to future development potential for the University beyond the 2018 General Use Permit.

Please also see Draft EIR Section 5.16 Utilities and Service Systems which addresses all Project and cumulative impacts on water supply and public utilities associated with the construction and operation of the proposed Project. See also Sections 7.4.4 and 7.4.5 of the Recirculated Portions of Draft EIR which address effects on water supply and public utilities associated with Additional Housing Alternative A and Additional Housing Alternative B.

RI-Blevins-7 The comments regarding effects on quality of life are acknowledged. However, they are socioeconomic effects outside of the scope of CEQA. Please see Master Response 1: Non-CEQA Comments.

RI-Blevins-8 The comments are acknowledged. Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Butler

From: [Phyllis Butler](#)
To: [Rader, David](#)
Subject: Stanford housing
Date: Monday, June 18, 2018 1:22:57 PM

Please ensure that the University adds housing for all employees to its mad pursuit of buildings!

Thanks.

Phyllis Butler

Teacher

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Sent from my iPhone

6.2.3.4 Responses to Comments from Phyllis Butler

RI-Butler-1 The Recirculated Portions of the Draft EIR include two additional housing alternatives that would increase housing, including for employees.

Comment Letter RI-Cohen

From: [Susie Cohen](#)
To: [Kumar, Kavitha](#); [Rader, David](#); [Supervisor Simitian](#)
Cc: [Don Horsley](#); [Warren Slocum](#); [Dave Pine](#); [Carole Groom](#); [David Canepa](#); [Mike Callagy](#); [Diana Shu](#); [Raymond Mueller](#)
Subject: OBJECTION TO STANFORD'S GUP REPORT
Date: Monday, July 23, 2018 5:39:30 PM

I agree with Janet's points below. We have lived in Stanford Weekend Acres for over 30 years and the increase in traffic has gotten intolerable. There is no way that the amount of traffic to Stanford has declined. I often leave the house at around 8:15am. I actually prefer when the traffic is so heavy that it is stopped. If I am driving, at least someone will let me get into the line of cars. It is when they are moving at a fast clip, one car length apart that I often have to wait 5 minutes or more to exit the frontage road to make a right turn. It is just about impossible to make a left turn. I tell people not to come to my house before 10am if they need to make a left turn off Alpine to get here because they might have to wait a long time to make their turn.

Wildwood Lane is the only street off of Alpine between Junipero Serra and 280 that does not have a turn lane. In Nov. 2015, we were rear ended while waiting to make a left turn into our frontage road. Our car was totaled and my "career" as a serious recreational triathlete ended. Over two and a half years later, I still suffer neck pain.

In April, 2017, my husband, Barry Weingast, was biking on the terribly inadequate bike path that goes under Juniper Serra. We both use the path regularly to avoid having to drive. It's a scary path to use as it there is a sharp turn with a very steep grade. Not only that, at the same place the surface is full of very deep cracks. So one needs to negotiate the cracks, have enough speed to get up a steep hill and go around a blind corner, all at the same time. This particular time, a professional cyclist decided to use the path to avoid the lights. At 16 mph, she swerved to go around a pedestrian and pinned my husband to the fence. He required 15 stitches in his hand.

I agree that Santa Clara needs to take the impact on San Mateo County into consideration when recommending approval of this report. The only thing we have ever been offered through the last GUP was a totally inadequate "recreational trail" that would have made our traffic situation even worse since it went right across our driveways and exits onto Alpine Road and would have been an extremely dangerous situation. When two different neighborhoods could not come to an agreement (it would have benefitted Ladera and parts of Portola Valley at our expense), they turned down the money and it went to Santa Clara County.

Susie Cohen


----- Forwarded Message -----

From: Janet Davis <jadjad@sbcbglobal.net>

To: Kavitha Kumar <kavitha.kumar@pln.sccgov.org>; David Rader <david.rader@pln.sccgov.org>; Joe Simitian <supervisor.simitian@bos.sccgov.org>

Sent: Monday, July 23, 2018 2:42 PM
Subject: OBJECTION TO STANFORD'S GUP REPORT

OBJECTION TO STANFORD'S ANNUAL GUP REPORT
Specifically with Respect to Traffic Impacts in San Mateo County
In the Alpine/Sand Hill/Alameda/Santa Cruz Corridor

(<https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU.2018.AR17.pdf>)

Appendix D, Section III Conditions G & Appendix G

The No New Net Commute Trips is Pure Magical Thinking:

The assertion is that far from the campus traffic *increasing* it has declined by 237 vehicles/day since the 2000 baseline during the monitored hours! Allegedly there were only 3202 incoming vehicles and 3324 outgoing vehicles from the entire campus! This resulted in there being no need to even use the fabricated “credits.” **That allegation is total nonsense and defies any kind of credibility.**

Page D-15 outlines the bizarre method for computing “No New Net Commute Trips” which, allegedly only counts vehicles whose destination is the *core academic campus*, eliminating “pass through” traffic and those vehicles going to the Hospital. However, this is belied by the statements on Page D-16. Here, there is an example of a credit that would be applied for someone (such as a patient) using a bus from the Cal station *to the hospital*. However, hospital traffic is completely eliminated from the cordon counts of traffic! This makes no logical sense.

It makes No Sense to Not Aggregate Campus, Hospital and Other Stanford Related Traffic from the Counts:

Another faulty assumption is that “rush hour” exists only between 7-9 a.m. In bound Campus traffic starts as early as 6 a.m. and continues until almost noon along Alpine, Sand Hill, Alameda, Junipero Serra and Santa Cruz Ave. On Alpine, traffic is bumper to bumper from 280 (and beyond) all the way from there to Campus Drive West, plus that which goes to the hospital. In the evenings Alpine, Sand Hill, Alameda, Junipero Serra and Santa Cruz are virtually gridlocked by traffic headed out from campus

Alpine/Sand Hill/Santa Cruz and Alameda

In the mornings the intersection of Alpine/Junipero Serra is so blocked that it often takes several iterations of the light to get through, (and as long as 6 minutes to go two blocks.) The same is true at Sand Hill/Santa Cruz. The bike lane between the two intersections is nonfunctional because it is taken up with Stanford Hospital bound vehicles.

The No New Net Trip Calculation Eliminates Traffic Caused by Sports & Other Public Events:

There are frequent sports events for Football, Basket Ball, Golf, Tennis, Indian Pow Wows, Concerts, Lectures, etc. that draw many thousands of people and vehicles in non compute times that are disruptive to neighborhoods in W. Menlo Park. Stanford’s own brochure on the 2018 GUP states that nearly a half million tourists come to the campus every year. These trips are not counted.

Given the multitude of Construction Projects listed on the Main Campus, and the number of present and proposed parking facilities, The Vehicular Counts are Obviously False:

Whatever time of day construction trucks go to and from campus, they are a nuisance and at least on Alpine they are a serious safety hazard because it is a two lane wind road with blind corners. The Map for truck routes shows Alpine as a *County truck route* and not recommended for construction vehicles, but it is used very frequently, as I have personally verified by following the construction trucks.

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The Central Campus includes those areas designated West Campus, Lathrop, and Foothills

This would include e.g. the Golf Course, yet traffic to this destination (which includes a commercial restaurant and catering operation) is not included in the computations.

9

Requested Neighborhood Traffic Surveys:

It is noted that none were requested. Yet, how many neighborhoods knew of this possibility? West Menlo Park could certainly use some surveys.

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Bike/Pedestrian Access:

There is no reliable bike access in areas of West Menlo Park and no pedestrian access along much of Santa Cruz and Alameda. Under the prior GUP Stanford stated that they would be contributing to improvements in these areas but nothing has happened. There is no pedestrian path along Junipero Serra to Alpine and Sand Hill, and no crosswalks at the Alpine/Junipero Serra intersection which means that pedestrians (and cyclists) have to run across the road to get to homes in Stanford Weekend Acres or try to squeeze into the bike lane between Alpine and Santa Cruz.

11

OTHER PROBLEMS:

Affordable Housing:

It is ridiculous to claim that student housing qualifies as low income housing. It is the lower paid Stanford workers who need the housing, not the students, since many of the undergraduates probably rely on their parents for “income” and do not have what one would expect to qualify under the usual definition of “income.” Providing worker housing in the vicinity of the core campus would ameliorate the intolerable traffic conditions in the nearby communities since many of these workers cannot afford to live close to campus.

12

Many of the Stanford workers come from San Mateo County yet most of the funds for affordable housing have gone to Santa Clara.

Fireworks:

There is a condition in the existing GUP allowing several firework shows/year. This has an extremely negative impact on residents and their pets in W. Menlo Park, especially any that suffer from PTSD. When these events occur it is as if we were in a war zone. This is not a good ecological practice, and encourages others to use illegal fireworks in a fire prone area. The GUP said that there were no noise complaints to their Noise Complaint number except for 10 on campus

13

Comment Letter RI-Cohen

residential complaints. However, local non campus residents have no clue as to this form of complaint and call the police who do receive complaints. Given the damage caused by fireworks, allowing these displays is socially unacceptable.

↑ 13
cont.

CONCLUSION:

Santa Clara County Planning Dept. has taken a very short sighted and uninformed view in recommending approval of this report with respect to San Mateo County. Santa Clara is required to consider the impact on all surrounding communities, and San Mateo County has borne the brunt of much of the construction, traffic and other events under the 2000 GUP and Santa Clara needs to take a more responsible position. This report is seriously flawed, inaccurate in many respects, and an inadequate and biased work product.

↑ 14

6.2.3.5 Responses to Comments from Susie Cohen

RI-Cohen-1 This comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

RI-Cohen-2 The EIR addresses all significant environmental impacts of the proposed Project and additional housing alternatives, including those impacts that would occur in San Mateo County. This comment is part of the public record on the project, and will be considered by the County decision-makers prior to considering Project approval.

RI-Cohen-3 The comment is on the 2000 General Use Permit, not on the Recirculated Portions of Draft EIR or the Draft EIR. Nevertheless, the following response is provided.

The 2000 General Use Permit included conditions to address parks and recreation facilities. Condition I.2 required that Stanford dedicate easements for, develop and maintain the portions of two trail alignments that cross Stanford's land shown in the 1995 Santa Clara Countywide Trails Master Plan. To comply with this condition, Stanford and the County of Santa Clara entered into a written agreement that required Stanford to construct trail improvements in Santa Clara County and offer funding to the County of San Mateo to improve the portion of the C2 trail shown in the 1995 Santa Clara Countywide Trails Master Plan that is located in San Mateo County along Alpine Road. The comment is correct that in August 2016, the County of San Mateo turned down the \$10.4 million offer to transform the lower Alpine Road trail into a multi-use path.¹ Pursuant to the written agreement between Stanford and the County of Santa Clara, Stanford then provided the \$10.4 million to the County of Santa Clara, and the County of Santa Clara established a grant program to fund recreational facilities near the Stanford campus. As a result, Condition of Approval I.2 has been complied with.

RI-Cohen-4 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. Nevertheless, the comment accurately states that the methodology used in the monitoring program only counts vehicles coming and leaving the core campus (2000 GUP, Conditions G.4 through G.7). The core campus is defined in Figure 3 of the 2000 GUP, which in turn is based on Figure 4.4-16 in the 2000 General Use Permit Final EIR. Condition G.8 establishes the concept of trip credits, which recognize that Stanford contributes to trip reduction in the area immediately outside the core campus by providing free bus service open to the public, as well as other programs and services. By providing free transportation service for people whose destinations are not within the core campus, Stanford is creating a community

¹ See <https://www.mercurynews.com/2011/12/13/san-mateo-county-supes-reject-alpine-road-trail-offer/>.

benefit. The credit concept only applies to travel to and from a defined area that is outside the core campus but within a short distance of the University (2000 MMRP, Mitigation Measure TR-5C). The trip credit area includes the hospital; hence the example mentioned in the comment of a person using a bus from the California Avenue Caltrain Station to the hospital. The example describes the bus portion of theoretical commute trip that would otherwise have been made in a private vehicle if the free bus service did not exist. The application of trip credits allows Stanford to offset growth in core campus peak hour, peak direction trips with reduction in trips in the area just outside of the core campus. Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for additional information regarding trip reduction credits.

RI-Cohen-5 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. However, please see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic), and Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

RI-Cohen-6 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. Furthermore, this comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

RI-Cohen-7 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR.

As noted on Draft EIR Appendix VMT page 44, for athletic and cultural (performances) events, no growth was anticipated for the 2018 Stanford General Use Permit because these programs and their venues already exist on the campus and are not expected to expand. Please refer to Master Response 13: Transportation and Traffic, Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

RI-Cohen-8 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. Furthermore, this comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

RI-Cohen-9 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. Because the comment refers to specific data from a document that is not the subject of this EIR, no response is required.

However, please note that the term “central campus” is used throughout the Community Plan as a designation for the area within the Academic Growth Boundary, which is generally north of Junipero Serra Boulevard (Community Plan, page 13, paragraph 2). The comment is correct that the golf course clubhouse (including the restaurant) and parking lot are within the Academic Growth Boundary. However, in the 2000 General Use Permit, the term “central campus” is used differently to describe the area within the cordon defined for traffic monitoring purposes (2000 General Use Permit Condition G.4). The golf course clubhouse and parking lot are outside of the cordon shown in Figure 3 of the 2000 General Use Permit. The staff housing south of Junipero Serra Boulevard is also outside the cordon.

RI-Cohen-10 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. However, the 2018 General Use Permit may contain a similar condition regarding neighborhood traffic surveys.

RI-Cohen-11 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. It also pertains to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

However, please note that Stanford proposes to fund four sets of off-site bicycle facility improvements in communities surrounding Stanford, including the cities of East Palo Alto, Palo Alto, and Menlo Park; and unincorporated San Mateo County. These improvements are subject to approval by each jurisdiction in which they are located. The proposed funding for off-site bicycle facility improvements is intended to reduce the potential for local vehicle congestion effects by encouraging use of alternative modes of transportation. The reductions in non-Stanford trips resulting from Stanford’s funding proposal would be credited toward achieving the no net new commute trips standard. Please see Chapter 8 of the Draft EIR, commencing on page 8-1, for more information regarding the four sets of bicycle facility improvements that Stanford has offered to fund.

If Stanford does not achieve the no net new commute trips standard, the County of Santa Clara would use fair share contributions collected by Stanford to fund one or more of the intersection improvements identified in the Draft EIR. If the

use of the funds for such intersection improvements is infeasible, the County would use the funds for other trip reduction programs in the local impact area, which may include additional bicycle facility improvements in neighboring cities.

Please refer to Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis for additional discussion of bicycle infrastructure improvements.

- RI-Cohen-12 Issues regarding affordability of housing are socioeconomic in nature, and not physical environmental impacts that must be analyzed under CEQA. Please see Master Response 1: Non-CEQA Comments, and Master Response 10: Affordable Housing. Nevertheless, the Draft EIR includes a discussion on the need to provide housing for all economic segments of the community, and is one of the primary reasons for including Additional Housing Alternatives A and B in the Recirculated Portions of Draft EIR. This is a policy issue that will be considered by the County Board of Supervisors.

Please also see Master Response 10: Affordable Housing, Topic 5: Geographical Distribution of Affordable Housing Funds, and Topic 6: Regional Housing Needs Assessment Affordable Housing Credit.

- RI-Cohen-13 This comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. Nevertheless, the following response is provided.

There are currently two pre-permitted fireworks events at Stanford per year. Should the number of fireworks events increase beyond the two pre-permitted displays per year, Stanford is required to obtain entertainment permits from Santa Clara County, which includes consideration of noise and other effects. Fireworks programs are relatively short, and temporary in nature and as a result would not result in significant adverse effects on the environment. Permits to use fireworks require a State Fire Marshal license for the public display of fireworks, and demonstration that the proposed activity would not be of a type or located in a location that may be hazardous to property or people.

- RI-Cohen-14 The comment is on the 2000 General Use Permit Annual Report, not on the Recirculated Portions of Draft EIR or the Draft EIR. It also pertains to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

Comment Letter RI-Cross

From: [Melanie Cross](#)
To: [Rader, David](#)
Subject: Stanford 2018 GUP
Date: Thursday, July 26, 2018 4:02:05 PM

As a neighbor of Stanford, I would like you to consider my comments on their application to the county for their latest ten year growth plan.

I have lived in this community since 1977 and experienced the growth in number of workers and residents both in Palo Alto and in the surrounding communities. I am concerned that the carrying capacity of our cities cannot sustain this pace of growth, and that the unequal ratio of jobs to housing is pushing lower income residents out of the area. It seems obvious to me that the rate of growth cannot continue; we are losing the quality of life we once had and the people who provide necessary services of all kinds but who are not highly paid (much less our children and elderly) can no longer afford to live here, or even within a reasonable commute.

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I have several specific recommendations on this current issue of Stanford's growth we face here:

1) Stanford should first house its current students, faculty, staff and service workers on campus before they bring in any more. Stanford is the largest land owner in the county but doesn't want to use its land to solve any of the problems we are facing. Stanford's assertion that more housing on campus will add more daily trips to the local area ignores the effect that new residents will have -where ever they find housing in the area. It doesn't go away because it is not in Palo Alto.

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2) Any influx of students to the Palo Alto Schools need to pay the costs to the district. It is not enough to say that Stanford Shopping Center and Industrial Park contribute a large amount of property tax that the district can use for schools. There are other expenses the community pays for with those property taxes. Let's not pretend that it all comes out in the wash. Please don't allow 650 to 1,800 new students to be added to the school district's rolls without a solid agreement that Stanford reimburses the district.

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In general, since we have gone through this exercise before, we know that Stanford has a bad track record of following through on the mitigations that were asked for. For instance, I don't feel they provided adequate trails through their land for residents recreational use, even though they said they would. They managed to wiggle out of providing trails through areas that didn't have a pre-existing trail or bike path, except for one short, difficult to access, trail thru a cow pasture, very little nature there. So we cannot expect that they will be a good neighbor and hold them selves to the spirit of the agreement this time.

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My overall plea to all governmental levels is please, please, **stop the growth**. I know we all love the tax money that comes with development, but for our area to remain livable, we needed to cut back on growth years ago. Now it is urgent that we stop adding jobs, not just cut back on the rate of growth. Stanford is a first rate institution, but I do not understand the need for continuous growth and wonder at what point Stanford thinks big is big enough.

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I wish i could have made my comments shorter for you, but hopefully you can incorporate my concerns into your consideration of their proposal.

Melanie Cross



6.2.3.6 Responses to Comments from Melanie Cross

RI-Cross-1 The issue of the carrying capacity of general growth in cities is acknowledged; however, it is not related to specific impacts of the proposed Project or alternatives. However, the EIR addresses all Project and cumulative environmental impacts, as appropriate. Please also see Master Response 2: Non-Project Planning Process, Topic 1: Sustainable Development Study as it relates to future development potential for the University beyond the 2018 General Use Permit.

The general comment made regarding effects on quality of life relates to socioeconomic impacts. Please see Master Response 1: Non-CEQA Comments, Master Response 9: Population and Housing Methodology and Calculations, and Master Response 10: Affordable Housing.

The Draft EIR Section 5.12, Population and Housing addresses Project and cumulative effects on population and housing. Similarly, the Recirculated Portions of Draft EIR Sections 7.4.4 and 7.4.5 address population and housing effects from the additional housing alternatives.

RI-Cross-2 As evidenced by the results of the traffic analysis of Housing Alternatives A and B in the Recirculated Portions of Draft EIR, accommodating more faculty, staff and service workers on-campus would increase overall Project-related vehicle trips and associated impacts. It should be noted that as of 2017, approximately 97 percent of all eligible undergraduates live in campus housing.

RI-Cross-3 Regarding impacts to schools, 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.

Please note the proposed Project would generate an estimated 275 school-age students for PAUSD (page 5.13-7 in the Draft EIR). Using conservative assumptions, Additional Housing Alternative B would generate an estimated 861 on-campus school-age students for PAUSD (see page 2-364 in the Recirculated Portions of Draft EIR), and Additional Housing Alternative A would generate an estimated 1,446 on-campus school-age students for PAUSD (see page 2-161 Recirculated Portions of Draft EIR).

RI-Cross-4 Please see Response to Comment RI-Cohen-3.

RI-Cross-5 A general comment is made requesting a stop in growth and adding jobs. This comment does not address the proposed 2018 General Use Permit, or the adequacy of the Draft EIR or Recirculated Portions of Draft EIR. Please see Master Response 1: Non-CEQA Comments.

From: [Janet Davis](#)
To: [Kumar, Kavitha](#); [Rader, David](#); [Supervisor Simitian](#)
Subject: OBJECTION TO STANFORD'S GUP REPORT
Date: Monday, July 23, 2018 2:43:18 PM

OBJECTION TO STANFORD'S ANNUAL GUP REPORT
Specifically with Respect to Traffic Impacts in San Mateo County
In the Alpine/Sand Hill/Alameda/Santa Cruz Corridor
(<https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU.2018.AR17.pdf>)
Appendix D, Section III Conditions G & Appendix G

The No New Net Commute Trips is Pure Magical Thinking:

The assertion is that far from the campus traffic *increasing* it has declined by 237 vehicles/day since the 2000 baseline during the monitored hours! Allegedly there were only 3202 incoming vehicles and 3324 outgoing vehicles from the entire campus! This resulted in there being no need to even use the fabricated “credits.” **That allegation is total nonsense and defies any kind of credibility.**

Page D-15 outlines the bizarre method for computing “No New Net Commute Trips” which, allegedly only counts vehicles whose destination is the *core academic campus*, eliminating “pass through” traffic and those vehicles going to the Hospital. However, this is belied by the statements on Page D-16. Here, there is an example of a credit that would be applied for someone (such as a patient) using a bus from the Cal station *to the hospital*. However, hospital traffic is completely eliminated from the cordon counts of traffic! This makes no logical sense.

It makes No Sense to Not Aggregate Campus, Hospital and Other Stanford Related Traffic from the Counts:

Another faulty assumption is that “rush hour” exists only between 7-9 a.m. In bound Campus traffic starts as early as 6 a.m. and continues until almost noon along Alpine, Sand Hill, Alameda, Junipero Serra and Santa Cruz Ave. On Alpine, traffic is bumper to bumper from 280 (and beyond) all the way from there to Campus Drive West, plus that which goes to the hospital.

In the evenings Alpine, Sand Hill, Alameda, Junipero Serra and Santa Cruz are virtually gridlocked by traffic headed out from campus

Alpine/Sand Hill/Santa Cruz and Alameda

In the mornings the intersection of Alpine/Junipero Serra is so blocked that it often takes several iterations of the light to get through, (and as long as 6 minutes to go two blocks.) The same is true at Sand Hill/Santa Cruz. The bike lane between the two intersections is nonfunctional because it is taken up with Stanford Hospital bound vehicles.

The No New Net Trip Calculation Eliminates Traffic Caused by Sports & Other Public Events:

There are frequent sports events for Football, Basket Ball, Golf, Tennis, Indian Pow Wows, Concerts, Lectures, etc. that draw many thousands of people and vehicles in non compute times that are disruptive to neighborhoods in W. Menlo Park. Stanford’s own brochure on the 2018 GUP states that nearly a half million tourists come to the campus every year. These trips are not counted.

Given the multitude of Construction Projects listed on the Main Campus, and the number of present and proposed parking facilities, The Vehicular Counts are Obviously False:

Whatever time of day construction trucks go to and from campus, they are a nuisance and at least on Alpine they are a serious safety hazard because it is a two lane wind road with blind corners. The Map for truck routes shows Alpine as a **County truck route** and not recommended for construction vehicles, but it is used very frequently, as I have personally verified by following the construction trucks.

5

The Central Campus includes those areas designated West Campus, Lathrop, and Foothills

This would include e.g. the Golf Course, yet traffic to this destination (which includes a commercial restaurant and catering operation) is not included in the computations.

6

Requested Neighborhood Traffic Surveys:

It is noted that none were requested. Yet, how many neighborhoods knew of this possibility? West Menlo Park could certainly use some surveys.

7

Bike/Pedestrian Access:

There is no reliable bike access in areas of West Menlo Park and no pedestrian access along much of Santa Cruz and Alameda. Under the prior GUP Stanford stated that they would be contributing to improvements in these areas but nothing has happened. There is no pedestrian path along Junipero Serra to Alpine and Sand Hill, and no crosswalks at the Alpine/Junipero Serra intersection which means that pedestrians (and cyclists) have to run across the road to get to homes in Stanford Weekend Acres or try to squeeze into the bike lane between Alpine and Santa Cruz.

8

OTHER PROBLEMS:

Affordable Housing:

It is ridiculous to claim that student housing qualifies as low income housing. It is the lower paid Stanford workers who need the housing, not the students, since many of the undergraduates probably rely on their parents for “income” and do not have what one would expect to qualify under the usual definition of “income.” Providing worker housing in the vicinity of the core campus would ameliorate the intolerable traffic conditions in the nearby communities since many of these workers cannot afford to live close to campus.

9

Many of the Stanford workers come from San Mateo County yet most of the funds for affordable housing have gone to Santa Clara.

Fireworks:

There is a condition in the existing GUP allowing several firework shows/year. This has an extremely negative impact on residents and their pets in W. Menlo Park, especially any that suffer from PTSD. When these events occur it is as if we were in a war zone. This is not a good ecological practice, and encourages others to use illegal fireworks in a fire prone area. The GUP said that there were no noise complaints to their Noise Complaint number except for 10 on campus residential complaints. However, local non campus residents have no clue as to this form of complaint and call the police who do receive complaints. Given the damage caused by fireworks, allowing these displays is socially unacceptable.

10

CONCLUSION:

Santa Clara County Planning Dept. has taken a very short sighted and uninformed view in recommending approval of this report with respect to San Mateo County. Santa Clara is required to consider the impact on all surrounding communities, and San Mateo County has borne the brunt of much of the construction, traffic and other events under the 2000 GUP and Santa Clara needs to take a more responsible position. This report is seriously flawed, inaccurate in many respects, and an inadequate and biased work product.

11

6.2.3.7 Responses to Comments from Janet Davis

- RI-DavisJ1-1 Please see Response to Comment RI-Cohen-4.
- RI-DavisJ1-2 Please see Response to Comment RI-Cohen-5.
- RI-DavisJ1-3 Please see Response to Comment RI-Cohen-6.
- RI-DavisJ1-4 Please see Response to Comment RI-Cohen-7.
- RI-DavisJ1-5 Please see Response to Comment RI-Cohen-8.
- RI-DavisJ1-6 Please see Response to Comment RI-Cohen-9.
- RI-DavisJ1-7 Please see Response to Comment RI-Cohen-10.
- RI-DavisJ1-8 Please see Response to Comment RI-Cohen-11.
- RI-DavisJ1-9 Please see Response to Comment RI-Cohen-12.
- RI-DavisJ1-10 Please see Response to Comment RI-Cohen-13.
- RI-DavisJ1-11 Please see Response to Comment RI-Cohen-14.

From: [Janet Davis](#)
To: [Don Horsley](#); [Warren Slocum](#); [Dave Pine](#); [Carole Groom](#); [David Canepa](#); [Michael Callagy](#); [Raymond Mueller](#); [Steve Monowitz](#)
Cc: [Rader, David](#)
Subject: Stanford GUP Alternatives A&B County Response re: Alpine Road
Date: Friday, July 20, 2018 2:12:24 PM

Pictures taken Friday 7/20/18 at 12:15 p.m. outside my driveway on Alpine Road by Stowe Lane showing why the Stanford GUP Traffic analysis for Alpine Road is a total fabrication.

Usually Fridays have light traffic, especially in summer when all the schools are out and people are on vacation.. The pictures also demonstrate why it often takes around 6 minutes and multiple light iterations to get to Junipero Serra from Stowe.

The intersection of Alpine and Stowe is where the La Entrada school bus stops and where there have been multiple accidents exposing the kids to danger. The shots also show why vehicles and motorbikes use the bike path and pedestrian walkway to overtake on the inside.

I was not able to get a picture of a cyclist trying to wave over vehicles that were blocking him in the bike lane. Traffic stretched to I-280, and to Junipero Serra. Much of the time it was at a dead stop. The “KEEP CLEAR” at Stowe was ignored.

When I tried to return home at noon cars blocked access to my driveway as is often the case for me and all my neighbors. In the morning, starting around 6-7 a.m. it is difficult-to-impossible to make a left turn to get to I-280. It even takes several minutes to make a right turn onto Alpine because traffic, most of which is headed to Stanford Campus or the hospital, will not let cars in.

In the afternoon/evening the I-280 bound direction is usually at gridlock starting around 3:30 p.m. Alpine is also the route of choice for Stanford (and other) construction trucks because of lack of traffic controls and law enforcement.

On garbage days or when the school bus is stopped (with flags out) campus/hospital bound traffic frequently goes around those vehicles, crossing the yellow lines. This is particularly dangerous to oncoming traffic since there is a blind corner.

Also, during the brief periods when traffic is light, Alpine turns into a speedway.

The San Mateo County BOS needs to take a much stronger stance on the total inadequacy of the DEIR and the alternatives A & B with respect to traffic impact . Santa Clara cannot approve a General Use permit if it can be shown that the development anticipated will cause congestion in neighboring communities.













6.2.3.8 Responses to Comments from Janet Davis

- RI-DavisJ2-1 This comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. Please also see Response to Comment RI-Cohen-6.
- RI-DavisJ2-2 Traffic impacts for the proposed Project are discussed beginning on page 5.15-68 of the Draft EIR and for the additional housing alternatives on page 2-175 (Additional Housing Alternative A) and page 2-379 (Additional Housing Alternative B) of the Recirculated Portions of Draft EIR.

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

If Stanford does not achieve the no net new commute trips standard, Stanford will be required to provide fair share funding for transportation mitigation. The Santa Clara County Planning Office under Mitigation Measure 5.15-2 will apply funds collected from Stanford to one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for intersection improvements is infeasible, the County will apply the funds to other trip reduction programs in the local impact area.

CEQA provides a process for lead agencies such as the County to approve projects with significant unavoidable impacts through adoption of a statement of overriding considerations (Public Resources Code § 21081(b)).

Comment Letter RI-DavisJ3

From: [Janet Davis](#)
To: [Steve Monowitz](#); [Don Horsley](#); [Michael Callagy](#); [Warren Slocum](#); [Dave Pine](#); [Carole Groom](#); [David Canepa](#); [Raymond Mueller](#); [Virginia Chang Kiraly](#); [supervisor.simitian@sccgov.org](#); [Rader, David](#); [Lennie Roberts](#)
Cc: [Cheryl Phan](#); [Molly Glennen](#); [Ron Snow](#); [Gwen Leonard](#); [Diana Gerba](#); [Susie Cohen](#); [Rebecca Altamirano](#); [Rick Voreck](#)
Subject: San Mateo county response to Santa Clara's Alternatives to SU DEIR
Date: Thursday, July 19, 2018 8:28:40 PM

I read the Draft Response to be reviewed by the BOS on Tuesday. I am glad that at least the county *is* filing a response, albeit a milquetoast one. The Alternatives suffered from the same inadequacies of the original DEIR with respect (among other issues) to Traffic and housing/employment imbalance.

Traffic: The data supplied with respect to traffic is flat out wrong. Much is made of the problems theoretically experienced at the intersection of Stanford Ave and Bowdoin in Palo Alto, yet that traffic situation is completely miniscule compared to the problems in San Mateo County on Alpine, Sand Hill and Alameda. The "No new net commuter trips" is meaningless because of all the credits logged within Palo Alto, that have absolutely no impact on the ever increasing traffic in San Mateo. "Rush hour" for Stanford campus/ hospital commuters starts around 5 a.m. and continues most of the day. Between 8 a.m. and 9:30-10 a.m. it takes approx. 6 minutes to go two blocks on Alpine to the Junipero Serra intersection. It usually takes another 1-2 minutes to get through the Sand Hill intersection. During the last GUP Stanford managed to convert Alpine to a truck route, which means that much of the day double dump trucks and cement trailers wend their way from the current 81 construction projects at SU via Alpine to I-280, because it has fewer traffic restrictions than Sand Hill. There is currently no restriction on loads, cargo or times of day for these trucks. There are two school bus stops on Alpine in the Stanford Weekend Acres subdivision: one at Bishop and one at Stowe. There have been frequent accidents where vehicles drive not only in the bike lane, but on the pedestrian path and the kids that wait for these buses are at danger. At no point in the DEIR does Stanford aggregate the traffic going to the new hospitals, the golf course, the athletic events, the shopping center, or the numerous commercial enterprises in their various industrial parks along Page Mill in Palo Alto, and Hillview/Coyote in Los Altos, or their various tenants along Alpine road, or to the back entrance of SLAC. Currently SLAC is scheduled to be having 25 truck loads of earth/day being removed (and replenished) from the back entrance of SLAC on Alpine for the next 6-8 weeks. Alpine Road has also become the route of choice for tour buses going to Stanford.

For several hours/day traffic is solidly blocked from I-280 (and backed up along the freeway) all the way along Alpine to Campus Drive West and to Sand Hill. The residents of Stanford Weekend Acres cannot make a left hand turn out of their driveways and have to go to Sand Hill and make a U-turn in order to access I-280.

Traffic between Alpine and Sand Hill is so dense because of all the traffic going to the hospital that cyclists cannot use the bike lane and have to resort to the below grade "trail" which is non ADA compliant. They frequently travel in excess of 25-30 mph and imperil children going to La Entrada and other pedestrians. The "trail" itself is in dire need of maintenance and was poorly designed by Stanford in the first place.

There is no adequate bike lane along Santa Cruz and Alameda and the pedestrian crossings used by seniors and children have become highly dangerous given the increase in Stanford traffic. A considerable amount of money is needed to remedy this situation.

The immense amount of traffic in West Menlo Park going to and from Stanford facilities often results in back ups at the intersections which hamper emergency vehicles trying to access accidents and fires.

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cont.

One of the main Findings that the County of Santa Clara has to make in issuing a Use Permit is that the use will not cause congestion in the surrounding community. **That Finding cannot be made with respect to the potential impact in San Mateo County.**

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Housing:

There are two main adverse impacts in West Menlo Park.

(1) Because of the lack of on campus housing, a lot of single family homes have been converted to student/faculty rentals or illegal short term rentals. This results in a home that would normally have 2 cars, having 7-9 cars causing parking problems. Large groups of students also frequently create more noise than a single family

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(2) Because of the housing scarcity and uptick in rentals and purchase price, many of the local businesses cannot find workers because people who would normally fill some of the jobs cannot afford to live in the area or pay to commute from other areas.

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Neither (1) nor (2) would have such drastic negative impacts if it were not for the fact that Stanford is constantly expanding its employment facilities on campus, in Palo Alto, Los Altos, Portola Valley, Menlo Park and Redwood City.

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Conclusion: The amount of development proposed under the GUP and alternatives is way too extensive and the traffic and housing impacts have not been adequately evaluated for San Mateo County. Much of the development proposed disproportionately impacts San Mateo County, yet Santa Clara Planning Dept. has concentrated almost exclusively on the impact in Santa Clara County. The Alternatives proposed do nothing to alleviate the housing problems. The conclusion drawn that providing more housing on campus would exacerbate the traffic problem seems far-fetched and illogical. Providing low income housing at remote sites close to transit does nothing to mitigate the dearth of local housing opportunities, or to deal with traffic problems, specifically in San Mateo county where there is no mass transportation from the I-280 corridor. The only sane approach is to phase any development with all the appropriate environmental reviews at the time of such development. The appropriate response to the DEIR and Alternatives is NO PROJECT or at the very least a REDUCED PROJECT.

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6.2.3.9 Responses to Comments from Janet Davis

RI-DavisJ3-1 Due to lack of specificity in the comment, no specific response can be provided. However, please see responses to individual comments that follow, below.

RI-DavisJ3-2 Several aspects of this comment pertain to prior or current conditions, which are not impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

Please refer to Master Response 13: Transportation and Traffic for discussion of the traffic analysis prepared for the Project, and specifically Topic 6: No Net New Commute Trips Standard for explanation of the effectiveness of the no net new commute trips program, including the ability to expand the program to reduce more vehicle trips in the future; Topic 7: Average Daily Traffic and Peak-Hour Spreading regarding the “rush hour” issue; and Topic 10: Bicycle and Pedestrian Analysis.

As illustrated in Figure 5.15-1 and presented in Table 5.15-1 of the Draft EIR, the analysis of Sand Hill Road, Alpine Road, Santa Cruz Avenue, and Alameda de las Pulgas is represented by 15 intersections. The project impacts at these intersections are presented in discussions of Impacts 5.15-2, Baseline plus Project and 5.15-9, Cumulative plus Project, respectively. A significant impact is identified at only one intersection between I-280 and the Stanford campus on Sand Hill Road, Alpine Road or Santa Cruz Avenue: Intersection #2 (I-280 NB Off-Ramp/Sand Hill Road). On page 5.15-123, the Draft EIR determines that if the no net new commute trips standard is not achieved, the impact at this intersection can be reduced to a less-than-significant level by widening the off-ramp from two to three lanes to accommodate the construction of a second right-turn lane. The same improvement was identified by the City of Menlo Park in the *ConnectMenlo* Final EIR.²

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

Draft EIR Section 5.15, Transportation and Traffic, Mitigation Measure 5.15-1 (Construction Traffic Control Measures) has been revised to specify that Stanford

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

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

shall deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. This mitigation measure would also apply to the additional housing alternatives, as discussed on page 2-176 (Additional Housing Alternative A) and on page 2-379 (Additional Housing Alternative B) of the Recirculated Portions of Draft EIR. This would ensure that Project construction trucks would be on routes established by applicable jurisdictions for use by trucks, and avoid construction truck traffic travel and related effects within local residential neighborhoods.

- RI-DavisJ3-3 This comment pertains to existing conditions, which are not impacts of the proposed Project. Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary. Please also see Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts for detail on why off-campus Stanford land uses and affiliates are not associated with the proposed 2018 General Use Permit population and academic development (and its associated traffic).
- RI-DavisJ3-4 This comment is in regard to an existing condition, not the impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis. With regard to Alpine Road, please see Responses to Comments RA-MP-5, RA-SMC-10, and RI-Cohen-3.
- RI-DavisJ3-5 As discussed in the Draft EIR, Section 2, Introduction, page 2-5, prior to approval of a project for which the EIR identifies significant environmental effects, CEQA requires the adoption of Findings of Fact (Public Resources Code Section 21081(a); CEQA Guidelines, Sections 15091 and 15092). If the Findings identify significant unavoidable impacts, a statement of overriding considerations must be adopted for those impacts before a project is approved (Public Resources Code Section 21081(c); CEQA Guidelines, Section 15093(b)). See Chapter 5 of the Draft EIR for a description of impact significance determinations.
- RI-DavisJ3-6 This comment pertains to existing conditions, not impacts of the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.
- RI-DavisJ3-7 This comment pertains to socioeconomic impacts, which do not fall within the scope of CEQA. Please see Master Response 1: Non-CEQA Comments.

RI-DavisJ3-8 This comment pertains to socioeconomic impacts, which do not fall within the scope of CEQA. Please see Master Response 1: Non-CEQA Comments. Stanford-associated developments in other jurisdictions are not associated with the proposed 2018 General Use Permit. Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenario, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary, for how these developments were addressed in the EIR.

RI-DavisJ3-9 A number of general comments are made on the Project and alternatives. Due to lack of specificity, no specific response can be provided to those comments; please see Master Response 3: General Comments on EIR and Environmental Topics.

The Draft EIR and Recirculated Portions of Draft EIR address all applicable Project and cumulative impacts, including those that would occur within San Mateo County.

The comment questions the validity of the EIR conclusion that Additional Housing Alternatives A and B would result in greater traffic impacts than the proposed Project. As stated on page 2-173 of the Recirculated Draft EIR, this is due to the higher vehicle trip generating characteristics of faculty/staff residential units as compared to Stanford commuters. Residential rates include trips by Stanford affiliates as well as spouses and other household members. A campus resident travels between the campus and other destinations for a variety of purposes, including shopping, dining out, religion, clubs and activities, recreation and exercise, entertainment, socializing, daycare, school, and off-campus employment. These types of travel can generate both outbound and inbound trips during the morning or evening periods. Faculty/staff housing units can also house non-Stanford affiliates as well as Stanford affiliates. In addition, many of the residence-based trips are not as amenable to transit and other modes such as vanpools as commute trips.

Please note that impacts of the Project on housing affordability is a socioeconomic issue that does not fall within the scope of CEQA. Please see Master Response 1: Non-CEQA Comments.

Regarding the request that development should be phased with appropriate environmental review at the time of such development, please see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

The commenter's preference for the No Project and Reduced Project Alternatives is acknowledged, is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.

From: [Janet Davis](#)
To: [Supervisor Simitian](#); [Rader, David](#)
Cc: [Don Horsley](#); [Michael Callagy](#); [Raymond Mueller](#)
Subject: Stanford GUP: More Objections
Date: Tuesday, July 10, 2018 11:00:20 AM

TRAFFIC:

I live 2 blocks from the Alpine/Junipero Serra intersection by Stowe Lane. This morning at 9:32 I managed to squeeze my car onto Alpine among the traffic backed up all the way to I-280. It took me until 9:42 a.m. (and several iterations of lights) to get through the intersections to Sand Hill Road. Ten minutes to go 2-3 blocks is totally unacceptable. ***This is summer with all the schools out.*** In school time it is considerably worse, and the new hospital and Med. Center have not yet opened. About 90% of this (and every other morning traffic) was headed either to Campus Drive West or to the Hospital. Because the traffic situation on Alpine and Alameda is so bad many local employers on Stanford land have very large employee buses: e.g. Nest and VMWare. Recently we have also been experiencing tour buses in our neighborhood. Whenever there is a sports event Alpine is deluged by fans. Stanford traffic is totally destroying our neighborhood, and endangering residents. Some of the commuters even use the pedestrian path as an additional lane and the county has had to spend thousands of dollars on curbs and stanchions to protect the kids walking to school. The last GUP managed to change the winding, two lane Alpine road that traverses a residential district to a Truck Route which it never was before and which is totally inappropriate, especially since it has school bus stops, a Samtrans bus line and limited space on garbage days.

There is **NO** ADA-compliant path to Sand Hill, thanks to Larry Horton of Stanford who managed to remove the existing street level path. The bike lane between Alpine and Sand Hill is consistently blocked by cars headed to the hospital which results in cyclists endangering those pedestrians that venture to use the "trail" under Santa Cruz Ave.

MISCELLANEOUS CONDITIONS:

The Santa Clara BOS managed to insert conditions into the last GUP that were favorable to Stanford and deleterious to surrounding communities. For example, SU is allowed to have firework displays. These impact all the surrounding neighborhoods for miles and scare everyone's pets. Since the VA Hospital is within earshot of these spectacles, these events must have a significant negative impact on veterans with PTSD.

HOUSING/JOB'S IMBALANCE:

The preferred alternative is obviously **NO PROJECT** since the original version of the 2018 GUP had significant negative impacts that were unavoidable, and the alternatives A & B demonstrated that were they to be instituted, those impacts would be significantly worse.

SANTA CLARA HAS A RESPONSIBILITY TO CONSIDER IMPACTS ON SAN MATEO COUNTY WHICH THE GUP DOES NOT

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6.2.3.10 Responses to Comments from Janet Davis

- RI-DavisJ4-1 Please see Responses to Comments RI-DavisJ3-2 through RI-DavisJ3-4.
- RI-DavisJ4-2 The comment expresses opinions concerning the 2000 General Use Permit, and is not related to the proposed 2018 General Use Permit. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. Regarding fireworks, please see Response to Comment RI-Cohen-13, above.
- RI-DavisJ4-3 The comment is acknowledged. Please see Master Response 3: General Comments on EIR and Environmental Topics.
- RI-DavisJ4-4 The EIR addresses all environmental impacts of the proposed Project and additional housing alternatives, including those impacts that would occur in San Mateo County. The commenter's preference for the No Project Alternative is acknowledged, is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.

From: [Janet Davis](#)
To: [Rader, David](#); [Supervisor Simitian](#); [Don Horsley](#); [Warren Slocum](#); [Michael Callagy](#); [Raymond Mueller](#); [Kirsten Keith](#)
Cc: [Cheryl Phan](#); [Molly Glennen](#); [Ron Snow](#); [Diana Shu](#); [Gwen Leonard](#); [Diana Gerba](#); [Susie Cohen](#); [Virginia Chang Kiraly](#); [Gunter Steffen](#); [Steve Monowitz](#)
Subject: OBJECTION TO STANFORD'S RECIRCULATED GUP
Date: Monday, June 25, 2018 2:18:34 PM

OBJECTION TO RECIRCULATED PORTIONS OF STANFORD'S 2018 GUP

There was no Satisfactory Explanation as to Why a GUP for 17 Years is Even Warranted:

No other entity has been granted this *huge privilege*. Stanford provided detailed plans for its 35 acre Redwood City Campus, why not for the main campus?. Here, Santa Clara County is potentially abrogating all responsibility for good urban planning. Who is to know what lies ahead in the next two decades, yet Santa Clara is giving Stanford *Carte Blanche for a monumental "Pig in a Poke."* This is just plain irresponsible, especially when even the DEIR admits that many of the negative impacts cannot be mitigated, and because there has been unanimous condemnation of the submission.

The two alternative versions of the GUP, purportedly authored by a county consultant, clearly espoused Stanford's arguments and did not appear to be unbiased.

OTHER PROBLEMS:

Lack of Examination of Impacts on San Mateo County:

CEQA requires that the application address impacts on all surrounding communities. The only emphasis in the GUP is on cities and areas within Santa Clara county. Impacts on San Mateo County are skipped over. Especially egregious is the failure to examine impacts on residents of West Menlo Park (both incorporated and unincorporated.) This is particularly evident regarding the already abysmal traffic at the two main intersections: Sand Hill and Alpine and the neighborhood cut through traffic by Stanford commuters.

Highly Flawed Traffic Data with Respect to San Mateo County:

Much of the traffic data is pure "magical thinking." It sometimes takes as many as 5-6 iterations of the traffic light at Alpine/Junipero Serra. Much of that traffic goes to the hospital. In the mornings, cars are backed up on I-280 and solidly blocked from there, through the Alpine/Junipero Serra intersection and on to Campus Drive West or to the hospital. Similarly, in the morning Alameda is backed up as far north as you can see with traffic split between going to the hospital and going to Campus Drive West. This is *before* the new hospital even opens.

If the GUP were to be approved, much of the newly generated traffic would attempt to use access routes to I-280 via Sand Hill and Alpine since much of the proposed construction would be in the West Campus and Campus Drive areas. There would also be problems at Sand Hill and El Camino

The vaunted existence of bike lanes in the campus vicinity in W. Menlo Park is not true. The same is true with respect to public commuter transportation.

The "No New Net Trips" is a Fallacy:

There was no Discussion as to Impact on Other Development That Could be Triggered

by the GUP

↑ 5
cont.

Projected Development is Bound to Require Additional Lower Paid Workers

The constant expansion at Stanford (and other companies spawned by the intellectual ability of many members of its community) has been influential in driving up housing prices, requiring lower paid workers (and many students) to live far from campus. The amount of money/sq. ft. of development offered by Stanford for affordable housing is woefully inadequate. Also, compensating distant communities does nothing to alleviate the already gridlocked traffic situation in the close surrounding communities.

6

The NO PROJECT Alternative Was Not Adequately Explored:

There is absolutely *no reason* that Stanford could not generate CEQA documents for *each* major construction project *at the time they plan it*. That way contemporaneous circumstances could be taken into account. This would not hinder Stanford's development, their rate of growth or their educational/research goals. *Even Stanford had a change of heart with respect to one project listed in the 2000 GUP for construction on the east side of campus, and they had to seek County approval to move that project to Quarry Road on the West side of campus*. No one has a crystal ball and this would be the most logical alternative.

7

WHAT NEEDS TO HAPPEN:

Stanford needs to build a tunnel under the foothills from I-280 to Campus Drive, that could be used by commuters and truck traffic, AND the university needs to provide commuter busses from San Jose (or even further south) and Daly City via I-280 at critical commute times to accommodate its "affiliates."

8

BOTTOM LINE: THE "NO PROJECT" ALTERNATIVE IS THE APPROPRIATE FINDING.

9

6.2.3.11 Responses to Comments from Janet Davis

- RI-DavisJ5-1 Comparisons between the 2018 General Use Permit and the Stanford in Redwood City Precise Plan are not meaningful, as they are different types of projects and subject to different types of EIRs (i.e., program EIR for the 2018 General Use Permit and project EIR for the Stanford in Redwood City Precise Plan).⁴

As discussed in the Draft EIR Chapter 3 Project Description, page 3-19, no site-specific projects and locations have been identified for development under the 2018 General Use Permit.

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 for additional information.

The comment is not specific regarding how the two alternative versions of the General Use Permit (presumably Additional Housing Alternatives A and B) appear to be biased. The EIR was prepared by the County as an objective document in accordance with CEQA's policies and requirements. Additional Housing Alternatives A and B were included in the Recirculated Portions of the Draft EIR for the purpose of comparison and to assist the public and decision-makers in understanding the implications of the construction of higher levels of housing on the Stanford campus, and to allow the County the option to select one of these alternatives at the conclusion of the CEQA process.

- RI-DavisJ5-2 Please see Responses to Comments RI-DavisJ3-2 through RI-DavisJ3-9.

- RI-DavisJ5-3 Please see Responses to Comments RI-DavisJ3-2 through RI-DavisJ3-9.

- RI-DavisJ5-4 Please see Master Response 13: Transportation and Traffic, Topic 4: Trip Generation and Distribution, for information on how project-generated trips were assigned to local and regional roadways, and Topic 5: Intersection Impacts and Mitigation for a discussion of how traffic impacts identified in the Draft EIR would be addressed if Stanford is unable to meet the no net new commute trips standard with implementation of the proposed Project.

Bicycle facilities in the vicinity of the campus are discussed starting on page 5.15-24 of the Draft EIR and off-campus facilities are described starting on page 5.15-26. As stated in the Draft EIR, several bike lanes located within the study area are in Menlo Park, notably along Alma Street, Alpine Road, Santa Cruz Avenue, and Sand Hill Road. The proposed Project includes funding for bicycle improvements in West Menlo Park for the Oak Grove Avenue

⁴ As described in the EIR Project Description for the Stanford in Redwood City Precise Plan, the Precise Plan is a zoning document with goals, policies, development standards, and urban design guidelines rather than a development blueprint. Accordingly, that EIR analyzed the precise plan document along with a conceptual site plan, but the EIR noted that other site plans could occur under the Precise Plan.

connections and the Alameda de las Pulgas corridor. Please see Chapter 8 of the Draft EIR, commencing on page 8-1, for more information regarding the four sets of bicycle facility improvements that Stanford has offered to fund. Please also see Master Response 13: Transportation and Traffic, Topic 10: Bicycle and Pedestrian Analysis.

RI-DavisJ5-5 Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary and Master Response 13: Transportation and Traffic, Topic 3: Travel Demand Forecasts, and Topic 6: No Net New Commute Trips Standard.

RI-DavisJ5-6 The impact of the Project on the affordable housing supply and amount of the affordable housing fee are socioeconomic issues that do not fall within the scope of CEQA. Please see Master Response 1: Non-CEQA Comments, Master Response 9: Population and Housing Methodology and Calculations, and Master Response 10: Affordable Housing. The County Board of Supervisors, as the decision-making body for the 2018 Stanford General Use Permit, will determine any in-lieu fee paid by Stanford for affordable housing demand generated by its academic development. Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

RI-DavisJ5-7 The comment regarding the preferred review and approval process for Stanford projects is acknowledged. Please see Master Response 1: Non-CEQA Comments.

Please note also, as discussed in Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals, procedures for use of this EIR to cover later project activities are established in Public Resources Code Section 21166 and CEQA Guidelines Sections 15168 and 15162(a). Under those sections, if the proposed future activities would have effects that were not examined in the Program EIR, further environmental review would be conducted in compliance with CEQA.

RI-DavisJ5-8 Regarding the need for a tunnel under the foothills, please see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Potential Alternatives.

Stanford, through its transportation demand management program, prioritizes support for public transit rather than operating its own fleet of long-distances buses. Currently, Stanford supports public buses from the East Bay and provides transit passes to employees to encourage use of public transit. Stanford staff works directly with public transit agencies to optimize access to campus by providing data for ridership modeling and having operation discussions with agency staff. At the Stanford Research Park, Stanford has initiated a partnership with Research Park employers to test the effectiveness of private bus lines. Stanford could elect to include this type of approach as part of an expanded transportation demand management program at the campus if it proves to be

necessary to achieve the no net new commute trips standard, particularly if public transit systems do not reach a specific destination where Stanford affiliates are concentrated.

RI-DavisJ5-9 The commenter's preference for the No Project Alternative is acknowledged, is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.

Comment Letter RI-DavisJ6

From: Janet Davis
To: Rader, David; Supervisor Simbikan; Don Horsley; Warren Slovum; Dave Pine; Carole Groom; David Canessa; Michael Callagy; City Council; Virginia Chang Kiraly; Diana Shu
Cc: Peter Dreksmeier; Cheryl Pham; Molly Glemmon; Ron Snow; Gwen Leonard; Diana Gerha; Susie Cohen; Jan Woloski; Robert & Esther Dicks via Gmail; Rebecca Altamirano; Christina Heltsev; Gunter Steffen
Subject: Comments on Santa Clara Alternatives A & B to Stanford's GUP and the Objections thereto by Stanford
Date: Thursday, June 21, 2018 8:39:12 PM

Below are my comments/objections to the epic opus circulated regarding Stanford's objections to Alternatives A and B. This was too massive and complicated a document for me to individually do a thorough analysis, but it is obvious that the NO PROJECT alternative is the only logical one: as even evidenced by Stanford's overwhelming objections to the two alternatives and to the Nexus study commissioned by Santa Clara County. The numerals refer to the end notes.

Comments on Santa Clara Alternatives A & B to Stanford's GUP and the Objections thereto by Stanford[1]

The 2018 Stanford GUP originally proposed building 2.275 million sq. feet of academic and research structures, plus 3,150 beds/housing units on the core campus. They additionally proposed funding \$56 million for affordable housing at various locations throughout the Bay Area.

Stanford's Primary Project Objectives in the GUP:

To develop the campus in a manner that reflects Stanford's historical growth rate assumptions in Stanford's approved Sustainable Development Study[2], and to continue to attract top faculty and foster academic excellence and research. To accomplish this, they state there is a need to expand their core campus by building more academic and research facilities to accommodate their anticipated increase in students and faculty.

The original GUP resulted in overwhelming objections by neighboring communities, organizations, and individuals based primarily on several criteria:

- The development was excessive and detrimental to surrounding communities
- The traffic that it would generate would overwhelm surrounding communities
- There needed to be a more significant amount of on campus housing especially for lower paid workers and to deal with the excessive commute traffic
- The amount that Stanford proposed to offer communities to provide affordable off-campus housing was totally inadequate
- The "No New Net Trips" metric was meaningless
- The GUP did not address impacts on San Mateo County
- The GUP did not adequately address Air Quality and Environmental issues

Santa Clara County's Response to the GUP (Nexus Study):

In response to the objections Santa Clara County commissioned a Nexus study by Keyser Marsten.[3] Their analysis required that if housing were to be provided in other communities *rather than on campus*, the cost to provide workforce-affordable-housing to support Stanford's planned expansion of 2.3 million square feet, would be:

\$143.10/sq.ft. of non --residential construction. (\$325 million versus the \$20/sq.ft or \$56 million offered by Stanford, or an additional \$269 million).

Santa Clara County's Recirculated Portions of the GUP Proposal for On Campus Housing Within the Academic Boundary Consisted of:

- **Alternative A:** Building all the required extra 2549 housing units/beds on campus (in addition to the 3150 proposed under the original GUP.
- **Alternative B:** Building half the required extra housing units/beds (or 1275 in addition to the 3150 proposed in the GUP)

Stanford Objections to the Keyser Marsten Nexus Assessment:

Stanford objected vehemently to the Keyser Marsten assessment on the grounds that it would drain their resources, limiting their ability to function, and would cause a significantly greater negative impact both on the campus and -surrounding communities.

In a press release, Catherine Palter.[4] (Assoc. VP Land Use & Environmental Planning) argued against both (A) & (B) on the grounds that, although it was counter-intuitive, both alternatives would actually generate *more* traffic problems than what was originally proposed, i.e providing \$56 million for remote locations within ½ mile of major transit routes or stations. (This option would also, according to Stanford's opposition, require the *remote jurisdiction* rather than Stanford, to provide the necessary mitigations.)

Stanford's Main Arguments Against (A) & (B) (summarized by Ms. Palter) were:

- (1) -That having everyone housed *on campus* would generate a considerable amount of family travel into neighborhoods to dine, recreate, do errands etc. and that these trips *would be outside the one hour "No New Net Trip" periods* rather than the commute travel by residents of other communities.
- (2) That it would disrupt the university's core mission of attracting top notch faculty and staff and also provide a block to the ability of students and faculty from freely moving from one academic facility to another because of the interspersing of housing units.in the midst of academic buildings
- (3) That the concentration of construction on campus would present additional environmental issues
- (4) That there were many additional environmental issues that would be generated by Alternatives A & B, over and above those presented in the original GUP.
- (5) Catherine Palter stated, that 91 of the 111 impacts noted in the GUP would be worse under either of the two alternatives.
- (6) That (to avoid blocking free flow/communication between academic facilities) housing development would have to be located *on the extreme edges* of the academic boundary and that should some of these facilities be occupied by non--Stanford "affiliates" (*not defined*) it might result in annexation to the City of Palo Alto. The particular "edge" locations suggested would be:
 - a. **Quarry Road** where the building height could be 150 ft. and the traffic impact would be along Sand Hill and El Camino in Menlo Park. Since this would be within ½ mile of major transit, no mitigation would be required since no negative impact would be counted as significant. This would entail 200,000 sq.ft. of development with 1100 units/beds
 - b. **The Red Barn** (Junipero Serra/Campus Drive West) This would generate traffic through incorporated and unincorporated Menlo Park *in San Mateo County*. This would entail 20,000 sq. ft .of construction comprising 800 beds/units that could be 135 ft. high
 - c. **The West Campus along Sand Hill Road**. This construction would entail 35,000 sq. ft. of construction comprising 666 beds/housing units at a density of 80 units/acre
 - d. Along El Camino Real in Palo alto

MY GENERAL COMMENTS IN RESPONSE TO STANFORD'S ARGUMENTS:

Other Available Options/Facilities Exist:

1. Stanford is building a 35 acre campus in Redwood City to accommodate all the non-academic functions of the main campus. This would free up a multitude of on-campus structures that, even under the 2000 GUP could be demolished/retrofitted for academic/research or even residential uses e.g. Encina Hall.
2. Stanford has a massive research facility at 1070 Arastradero Road[5], Los Altos
3. There is a brand new biomedical research building being built adjacent to the hospital
4. The Physics Dept. has expansive use of the facilities at SLAC which they rent to the Federal Govt. for \$1/year and which also eliminates the need for CEQA considerations for additional building since it is a Federal Facility.
5. Many of the firms in the vast Stanford Industrial parks (around Page Mill, Foothill Expressway, Coyote Hill/Hillview) have connections with Stanford and cooperative research facilities
6. There is no list of Stanford's actual water rights or details of their proposed ground water use. Also, the university's increased demands for water, energy and sewer facilities might deprive other non Stanford development of access to these facilities.
7. The Response to the Recirculated Portions A and B Ignore the Cumulative Impact of Stanford's Development throughout the jurisdictions adjacent to campus.

MY SPECIFIC OBJECTIONS TO STANFORD'S RESPONSE TO THE RECIRCULATED PROPOSALS (A) AND (B)

I focus on proposed locations (a) (b) and (c) that would drastically impact Menlo Park.

1. "Pig in a Poke" Responses to Alternatives A and/or B

There is absolutely no indication as to exactly *what* Stanford wants to build, or *where* it wants to build, despite the fact that the administration issued a White Paper listing the university's long term plans.

2. Construction traffic:

There is no discussion of how this would be handled, other than that it would go on previously approved truck routes. One of those would probably be Alpine road which mysteriously, and totally improperly, became a truck route courtesy of the last GUP. This has caused massive traffic problems on Alpine and during the last major construction event, double dump trucks and concrete trucks were clocked at 1 every 17 seconds for a considerable time.

3. The impact on Menlo Park Traffic is virtually ignored

4. *There is no certainty* in "final" plans as was recently evidenced by the location-switch of a facility from the east side of campus to Quarry Road

5. Faculty/Staff Parking would not count towards on campus parking limit

6. "No New Net Commute" Trips:

This concept is pure fantasy. Cordon counts are taken at "cordon points" twice a year for 2 hours in the morning and 2 hours in the evening but only in the commute direction and only by commuters. Only 1 hour of the 2 hours is counted and then it is averaged. License plates are photographed entering and exiting and any vehicle that is on the core campus for 15 mins. or less is not counted and dismissed as "through traffic." This would eliminate most drop-offs and deliveries. All hospital destined traffic is also deducted from those amounts. Then there are "credits" for "reduced trips" i.e. for those who use the train, bike, bus, or step on a Marguerite shuttle (wherever it is destined to go and even if the traveler is not a Stanford affiliate.) Only after the base line figure is exceeded for 2 consecutive years out of 3, mitigation is required but only for certain specified intersections. Even then this is computed at Stanford's purported "fair share" of that mitigation. This is then further divided by 17 to annualize the purported mitigation amount, and then further divided by the total number of peak hour, peak direction vehicle trips anticipated in the EIR without "no new net commute trips". Finally, any money that is arrived at after all the deductions, goes to Santa Clara County, *not to San Mateo* where much of the commuter traffic occurs now, and will occur in significantly greater amounts should this development take place

CONCLUSION:

Stanford's response to Santa Clara's Proposed and Recirculated Alternatives A and B is a brilliantly written work of total deception. There are several perfectly feasible alternatives to the original GUP. The most desirable would be the NO PROJECT alternative, whereby each major construction project would go through its independent CEQA process. It is totally foolhardy to plan massive construction 17 years into the future. Redwood City required detailed plans right down to the landscaping and the Architectural finishes to each building, and the mitigations, *prior* to approving any part of that campus. The various cities within Santa Clara County have been just as conscientious with respect to Google, Facebook etc. There is no reason that Santa Clara County should be dismissive as to the consequences to other jurisdictions.

Of especial concern is the deviousness with which Stanford has behaved with respect to this filing, in that they have not incorporated the cumulative impact of their constant development outside the boundaries of the Academic Core (which itself has recently been expanded.)

The only acceptable alternative is have NO PROJECT and to evaluate each development as it is proposed, with careful consideration of the specific mitigations required by that particular

development.

[1] **The Recirculated Portions (45 day period to respond expires 7/26/18) are posted at:**

[Recirculated Portions of Draft EIR - Vol 1](#)

[Recirculated Portions of Draft EIR - Vol 2 \(Appendices\)](#)

[2] **The Sustainable Development Study is posted at:**

https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU_SDS_web.pdf

That historical growth rate was listed in the above at Executive Summary Ch. 1, p.3 was:

(low) 115,000 sq.ft./year

(moderate) 200,000 sq.ft./year

(Aggressive) 300,000 sq.ft./year

The path chosen was the moderate rate from 2018-2035

[3] **The Keyser Marsten Nexus study is posted at:**

<https://www.sccgov.org/sites/osh/HousingandCommunityDevelopment/Documents/County%20of%20Santa%20Clara%20Affordable%20Housing%20Nexus%20Studies%20Public%20Review%20Draft.%2004-04-2018.pdf>

Santa Clara County's Nexus study performed by Keyser Marsten required the cost to provide workforce affordable housing to support Stanford's planned expansion of 2.3 million square feet, to be \$143.10/sq.ft. (\$325 million versus. the \$20/sq.ft or \$56 million offered by Stanford).

[4] <https://news.stanford.edu/2018/06/15/pursuing-housing-solutions-campus-land-use-planning>

[5] <https://news.stanford.edu/2017/12/12/redwood-city-campus-moves-ahead>

6.2.3.12 Responses to Comments from Janet Davis

- RI-DavisJ6-1 The commenter’s preference for the No Project Alternative is acknowledged, is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.
- RI-DavisJ6-2 Please see Master Response 1: Non-CEQA Comments, and Master Response 3: General Comments on EIR and Environmental Topics. The comment incorrectly states Stanford’s primary objective. Stanford’s primary objective, as stated in the Draft EIR Chapter 3, Project Description, page 3-1, is County approval of a 2018 General Use Permit that would authorize continued growth and development of the campus in a manner that implements the Stanford Community Plan’s policies and that reflects the growth assumptions in the approved Sustainable Development Study.
- RI-DavisJ6-3 This comment pertains to existing conditions. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. The comment provides opinions on how neighboring communities, organizations and individuals reacted to the proposed 2018 General Use Permit.
- RI-DavisJ6-4 The amount of the affordable housing fee is a socioeconomic issue that does not fall within the scope of CEQA. Please see Master Response 1: Non-CEQA Comments. The County Board of Supervisors, as the decision-making body for the 2018 Stanford General Use Permit, will determine any in-lieu fee paid by Stanford for affordable housing demand generated by its academic development. Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.
- RI-DavisJ6-5 The comment summarizes characteristics of the additional housing alternatives; no response is required.
- RI-DavisJ6-6 Please see Master Response 1: Non-CEQA Comments.
- RI-DavisJ6-7 Please see Master Response 1: Non-CEQA Comments.
- RI-DavisJ6-8 Please see Master Response 1: Non-CEQA Comments.
- RI-DavisJ6-9 Please see Master Response 1: Non-CEQA Comments. Regarding the level of specificity of the proposed Project in the EIR, please see Master Response 5: Project Description, Topic 1: Level of Specificity.
- RI-DavisJ6-10 Please see Response to Comment RI-DavisJ3-2.
- RI-DavisJ6-11 Please see Response to Comment RI-DavisJ2-2.

RI-DavisJ6-12 The 2018 General Use Permit EIR is a program-level evaluation, and does not specifically consider individual projects. Project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at the time they are proposed to determine whether the environmental effects of the specific project were adequately disclosed in the 2018 General Use Permit Program EIR. Please refer to Master Response 4: Environmental Review Process, Topic 1: Use of Program EIR and Subsequent Approvals.

RI-DavisJ6-13 Parking for faculty/staff housing is not included in the 2000 General Use Permit's parking totals (see Stanford Community Plan p. 68). The 2000 General Use Permit includes an exemption for parking to serve faculty/staff housing in the Campus Residential -- Medium-Density and Campus Residential -- Low Density zones. Under the proposed 2018 General Use Permit, new faculty/staff housing is proposed in the A-1 zoning district. The exemption for parking to serve that housing simply extends the existing exemption to the new locations where the same type of housing is now proposed. Any new parking for faculty-staff housing under the 2018 General Use Permit would similarly not be counted toward the parking allocation for academic use as it would serve high-density faculty/staff housing on the Academic Campus.

RI-DavisJ6-14 Please see response to RI-Davis-J5-5.

RI-DavisJ6-15 Please see Response to Comment RI-DavisJ5-7.

Comparisons between the 2018 General Use Permit and the Stanford in Redwood City Precise Plan are not meaningful; please see Response to Comment RI-DavisJ5-1. Similarly, it is not meaningful to make a comparison between the 2018 General Use Permit and its environmental review, with the Facebook Campus project in Menlo Park, which was analyzed in a project-level EIR; or the Google expansion project in Mountain View, which was considered in the context of the larger North Bayshore Precise Plan, and analyzed in the North Bayshore Precise Plan Subsequent EIR.

Please see Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios, Topic 3: Consideration of Non-Project Stanford-Related Development Outside General Use Permit Boundary, for how off-site non-Project related development was accounted for in the EIR.

RI-DavisJ6-16 The commenter's preference for the No Project Alternative is acknowledged, is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval. Regarding the request that each development be evaluated as it is proposed, please see Response to Comment RI-DavisJ5-7.

Comment Letter RI-Drekmeier

July 25, 2018

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

Re: Recirculated Portions of Draft EIR – Stanford GUP

Dear Mr. Rader:

Thank you for the opportunity to comment on the new housing alternatives studied in the Draft EIR for the Stanford GUP. I appreciate that the County is taking the regional housing crisis and related traffic impacts seriously. It is clear from the DEIR that all development (both academic and housing) results in environmental impacts, but requiring Stanford to build enough units on campus to house all of its new employees and students will certainly reduce vehicle miles traveled and urban sprawl, while enhancing the quality of life for Stanford's lower- and middle-wage employees.

1

I had hoped the DEIR would study a third alternative that combined the total amount of development proposed by Stanford (academic and housing – about 3.5 million square feet) and split it between academic and housing so that all new people coming to Stanford could be housed on campus. I hope the Board of Supervisors will consider this alternative, which I understand is a possibility because the various components are studied in the DEIR, although not in a package.

2

It is important to remember that the County is not obligated to grant Stanford any additional development rights. The County could simply say no to more development on campus, determining that the environmental and community impacts are simply too great. I'm not suggesting the County pursue this course, however, I do encourage the County to condition approval of the 2018 GUP upon agreement that at the end of its life, Stanford will be considered fully developed, and the County will adopt a policy of no-net-new academic development. The University could adapt to changing times by repurposing buildings that house outdated uses, or replacing old buildings with new ones of equal square footage.

3

The Stanford community and its neighbors have suffered from the housing crisis and traffic congestion caused by overdevelopment for too long. We need to acknowledge limits to growth and the importance of not exceeding the carrying capacity of our region. Stanford, with all of its brilliant minds, can figure out ways to continue to excel without building increasingly more artifact. The future is here, it's challenging, and we need to approach development in a new way.

4

Thank you for considering my comments.

Sincerely,



Peter Drekmeier



6.2.3.13 Responses to Comments from Peter Drekmeier

- RI-Drekmeier-1 The comment is acknowledged. With respect to VMT, the Recirculated Portions of Draft EIR reports that for both Additional Housing Alternatives A and B, adding on-campus housing would reduce the average daily VMT per worker but would increase the average daily VMT per campus resident as compared to the proposed Project, for a total net increase in campus-based VMT under these alternatives compared to the Project. However, as discussed beginning on page 5.15-147, the VMT methodology does not consider VMT from trips related to off-campus housing generated by the Project except for trips that start at home and end at Stanford and vice versa.
- Comments regarding effects on quality of life for lower- and middle-wage workers raise socioeconomic issues that are outside the scope of CEQA. Please see Master Response 1: Non-CEQA Comments, and Master Response 10: Affordable Housing.
- RI-Drekmeier-2 The comment regarding an alternative that combines the total amount of academic and housing development proposed by Stanford under the 2018 General Use Permit, but splits it between academic and housing is acknowledged. Please note that CEQA does not require multiple variations of the alternatives evaluated in an EIR to be considered. (See *Village Laguna of Laguna Beach Inc. v. Board of Supervisors of Orange County* (1982) 134 Cal.App.3d 1022, 1028. Also, the Board of Supervisors may ultimately approve a project that is a variation of the alternatives presented in the EIR as long as the approved project it falls within the range of the alternatives evaluated in the EIR. Please see Master Response 8: EIR Alternatives, Topic 2: Additional Detail on Project Alternatives for information about variations on alternatives.
- RI-Drekmeier-3 The comment regarding the County's approval options is acknowledged.
- RI-Drekmeier-4 The comment is acknowledged. It is part of the record for the Project and will be considered by the County Board of Supervisors.

Comment Letter RI-Finkelstein

From: [Diane](#)
To: [Rader, David](#)
Subject: Stanford GUP application
Date: Thursday, July 19, 2018 2:57:04 PM

As a long term resident of College Terrace in Palo Alto, I feel like a frog slowly being boiled to death in increasingly hot water. Stanford has not even completed its building under the 2000 GUP, which is still in high gear. Could we wait and see the effects of this first?

And, as to the housing plans being circulated, they are like being offered a choice to be executed by firing squad or hanging. Funny how Stanford argues that on campus housing still will generate many car trips. As I recall they took the opposite position to support their massive residential building off California Avenue across the street from my neighborhood.

Please proceed with these concerns in mind.

Thank you,

Diane Finkelstein



Sent from my iPad

1

6.2.3.14 Responses to Comments from Diane Finkelstein

RI-Finkelstein-1 The comments do not address the adequacy of the Draft EIR or Recirculated Portions of Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Glennen

From: Molly Glennen
To: avitha.kumar@pln.sccgov.org; Rader, David; Supervisor Simitian
Cc: Don Horsley
Subject: Stanford GUP Alternative A and B feedback
Date: Thursday, July 26, 2018 11:39:47 AM

The following comments come from the Singleton Household at [REDACTED] in Menlo Park at the intersection of Santa Cruz Ave. and Alameda de las Pulgas in West Menlo Park.

OBJECTION TO STANFORD'S ANNUAL GUP REPORT
Specifically with Respect to Traffic Impacts in San Mateo County
In the Alpine/Sand Hill/Alameda/Santa Cruz Corridor
(<https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU.2018.AR17.pdf>)
Appendix D, Section III Conditions G & Appendix G

No New Net Commute Trips uses Flawed Methodology

- The people living in the Santa Cruz/Alameda/Alpine corridor in West Menlo Park totally disagree with the report that traffic counts went down. The methodology is flawed as is the logic to the approach. Stanford is essentially having their cake and eating it too and its neighboring residents are being harmed by their proposed GUP and both Alternatives A and B. Page D-15 outlines the method for computing “No New Net Commute Trips” which, allegedly only counts vehicles whose destination is the *core academic campus*, eliminating “pass through” traffic and those vehicles going to the Hospital. However, this is belied by the statements on Page D-16 in which an example of a credit that would be applied for someone (such as a patient) using a bus from the Cal station *to the hospital*. However, hospital traffic is completely eliminated from the cordon counts of traffic! This makes no logical sense. 1
- There is no “rush hour” for traffic in this corridor. It begins as early as 4am and continues until 9pm. Limiting the traffic count to only between 7-9 a.m does not reflect reality. Often the busiest line ups at the intersection of Santa Cruz and Alameda are outside those “rush hour” times. 2
- Every day traffic is bumper to bumper going to and from campus and impacting Alpine, Sand Hill, Alameda, Junipero Serra and Santa Cruz Ave in West Menlo Park. 3
- The counts don’t include the construction trucks which are ever-present and nonstop with the ongoing development at Stanford. Whatever time of day construction trucks go to and from campus, they are a nuisance and at least on Alpine they are a serious safety hazard because it is a two lane wind road with blind corners. These trucks should NOT be using Alpine at all as it is listed as a **County truck route** and **not recommended** for construction vehicles, but it is used very frequently. 4
- The Central Campus includes those areas designated West Campus, Lathrop, and Foothills. This would include e.g. the Golf Course, yet traffic to this destination (which includes a commercial restaurant and catering operation) is not included in the computations. 5
- **The No New Net Trip Calculation Eliminates Traffic Caused by Sports & Other Public Events.** There are frequent sports events for Football, Basket Ball, Golf, Tennis, Indian Pow Wows, Concerts, Lectures, etc. that draw many thousands of people and vehicles in non-compute times that are disruptive to neighborhoods in W. Menlo Park. Stanford’s own brochure on the 2018 GUP states that nearly a half million tourists come to the campus every year. These trips are not counted. 6

Alternatives A and B Don't Factor in the Impact to County of San Mateo and West Menlo Park

- The GUP and its Alternatives A & B do not account for the ongoing detrimental impact that Stanford has on San Mateo County and West Menlo Park in particular. Quite simply, Stanford is not being a good neighbor.
- Santa Clara County Planning Dept. has taken a very short sighted and uninformed view in recommending approval of this report with respect to San Mateo County. Santa Clara is required to consider the impact on *all surrounding communities*, and San Mateo County has borne the brunt of much of the construction, traffic and other events under the 2000 GUP. Santa Clara needs to take a more responsible position.

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6.2.3.15 Responses to Comments from Molly Glennan

RI-Glennan-1 See Response to Comment RI-Cohen-4.

RI-Glennan-2 See Response to Comment RI-Cohen-5.

RI-Glennan-3 See Response to Comment RI-Cohen-6.

RI-Glennan-4 See Response to Comment RI-Cohen-8.

RI-Glennan-5 See Response to Comment RI-Cohen-9.

RI-Glennan-6 See Response to Comment RI-Cohen-7.

RI-Glennan-7 As described in Response to Comments RI-Glennan-1 through RI-Glennan-6, the Recirculated Portions of Draft EIR addresses all significant environmental impacts associated with construction and operation of the additional housing alternatives, including those impacts that would occur to the West Menlo Park neighborhood and San Mateo County.

RI-Glennan-8 The County Planning Department has not recommended “approval” of the EIR at this time. The County Board of Supervisors will consider the comments received on the Draft EIR and Recirculated Portions of the Draft EIR and the responses to comments prepared in this Response to Comments Document, prior to making any decision to certify the Final EIR as adequate and complete. See also Response to Comment RI-Glennan-7, above.

Stanford University 2018 GUP

Comments on the Recirculated Portions of the Draft EIR

I'm pleased to see this analysis of additional alternatives but to some extent it simply highlights the fallacy in the disconnected nature of the process. The impacts of Stanford affiliates and their families on the surrounding communities remain similar regardless of whether they are housed on campus or off.

Without the added on-campus housing, nearly 40% of the new off-campus affiliates would still be likely to settle in the three surrounding communities (Palo Alto, Menlo Park, Mountain View). With the addition of their extra commute trips, this is essentially the same burden on the community as the Alternative B model! Stating that the local governmental agencies "can and should mitigate the environmental impacts" is simply pushing the problem onto these neighboring communities that are already drowning in a sea of "less than significant" impacts from previous projects including Stanford's expansion since 2000.

The real answer is that it's time for Stanford to stop expanding their population. I can understand why some increase in physical space may be needed in order to support changing educational needs but I fail to see why having an ever-increasing population of affiliates is necessary. As economist/philosopher Kenneth Boulding said, "Anyone who believes exponential growth can go on forever in a finite world is either a madman or an economist." STOP!

Traffic Impacts

Alternatives A and B propose alterations in no-net-new-trips due to the presence of additional residential trips, acknowledging that it may not be possible to meet the standard since TDM measures "are not as effective in reducing residential trips". This is extremely concerning. The no-net-new-trips standard is already rather a joke since the peak hour has spread to about three hours, twice a day, and the number of "exceptions" that are eliminated seems to keep increasing.

Drop-offs

The No Net New Trips analysis proposes eliminating any car from the count that enters and leaves the campus within a short period. This excludes any drop-off trips such as UBER or Lyft as well as personal drop-offs. Those must be counted toward the no-net-new-trips.

CT Cut-through

I question the assumption that no more than 20% of the peak period trips from Stanford Avenue to Page Mill/ California Avenue area would opt for the circuitous route through CT. Particularly with the addition of many new residents in the East Campus area and the increasing congestion on El Camino Real, our little neighborhood streets will continue to be an attractive option. The new residents will likely emerge from campus onto Stanford Avenue at points other than Bowdoin and could easily travel through the neighborhood – once one has managed to find the route once, repeating it is easy.

In addition to the routes mentioned in the analysis, there is already significant traffic from Stanford Avenue using Yale Street/ Oxford Avenue to reach El Camino while avoiding the Stanford / El Camino signal especially when lower Stanford Avenue is backed up at the signal. This cut-through must be analyzed and safety measures proposed.

Traffic Mitigation Measures

Intersection #34:

Among the mitigation recommendations is a recommendation that Stanford contribute fair-share funding toward the installation of a signal at Intersection #34, Bowdoin Street / Stanford Avenue. The Impacts of Mitigation for this indicates that the traffic signal would **increase pedestrian quality of service** by providing “protected crossing times”. As a regular pedestrian user of that intersection during the morning peak hours, I can attest that the quality of service for pedestrians is currently excellent. I’ve never had to wait more than 10 seconds for one or two cars to clear before being able to proceed. With a signal (likely three- or even four-way to accommodate the significant percentage of turning movements), pedestrians will routinely face a lengthy wait before crossing. This does **not** improve the quality of service!

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cont.

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The bicycle QOS, however, already needs to be addressed since increasing numbers of cyclists are passing through the barrier on Bowdoin heading for the campus. Automobile drivers do not always see them or allow them their fair turn. Perhaps a traffic circle should be considered.

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cont.

Intersection #48:

The analysis of this mitigation, the addition of a second northbound left-turn lane at El Camino Real / Embarcadero Road, indicates that the pedestrian and bicycle QOS would remain unchanged, claiming that the crossing distances would remain unchanged. However, the first paragraph of the analysis states that additional right-of-way may be needed. These two statements are not consistent and should be corrected.

6

Impact on Parks

Alternative A is anticipated to increase visitation by on-campus residents to the four College Terrace parks above the screening threshold. The proposed mitigation is a **one time** funding contribution for turf replacement. This makes no sense since the new on-campus residents are not likely to stop using CT parks: the accelerated wear on the turf will continue into the future and Stanford should continue to pay a fair share contribution into the future.

7

Schools

The analysis of increased public school enrollment focuses on physical space and fails to address funding. However, since Palo Alto is a Basic Aid district, the fact that these additional housing units are most likely university-owned rentals (vs. ground lease) means that there will be no additional tax revenue to cover the costs associated with the additional 1446 (Alternative A) or 861 (Alternative B) students. It seems that the residents of Palo Alto will be covering these costs through our property taxes. Stanford should be required to contribute to match the per student Basic Aid payments.

8

Construction Impacts – noise and fugitive dust

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The additional construction for Alternatives A and B will massively increase the construction impacts on residents of College Terrace especially as it is acknowledged that adding the additional units in the East Campus area will require redeveloping the existing housing in that area at a higher density. Unfortunately, the prevailing wind direction generally blows toward our neighborhood, carrying both noise and dust in our direction. The best practices mitigation measure states that Stanford is required to water all exposed areas twice a day. But during the previous development of faculty/staff housing along El Camino and Stanford Avenue, they did not water dirt piles on weekends. We need to ensure that exposed dirt is covered or watered **even on weekends when they are not working**. Huge clouds of dust blew into our area and into/onto our homes.

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cont.

The required response time for complaints is supposed to be “within 48-hours” which is completely useless when one is experiencing a dust storm!

Noise and Light

Both Alternative A and Alternative B are expected to create a long-term increase in noise levels. The mitigation measure 7A/B.11-4 places limits on how much the project can raise the average 24-hour noise level. But night-time ambient noise levels may be even more important to residents. **Any** increase in night noise levels must be avoided. Once again it seems to be acceptable for each project to have a “less than significant” impact, which over time adds up to a huge change. If every project adds 2 – 3 dB to the local ambient level, we’ve soon added 10 dB or more.

10

Both alternatives are also expected to add to the night lighting. Unfortunately, spillover light is already a problem from the Stanford Campus. There is a noticeable glow above the athletic fields many nights, particularly when there are low clouds in the area. Any additional light is unacceptable. The same mitigations were included in the 2000 GUP but somehow they never seem to be truly effective.

11

Wildland Fires

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The analysis of both Alternatives states that they will not contribute cumulatively to exposure to wildland fires. Given that these alternatives add additional development in close proximity to the highly combustible eucalyptus groves, I believe that they increase the possibility of igniting such a fire. Considering the effects of the Oakland Hills fire in the early 90's as well as the deadly Santa Rosa firestorm last year, this is not an acceptable risk.

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cont.

Visual character

Under the 2000 GUP Stanford was required to protect the visual quality along El Camino Real. Despite the 2007 *Plan for El Camino Real Frontage*, the addition of numerous light standards on the various athletic fields has completely ruined the view of the historic Hoover Tower and the hills beyond.

The analysis of additional housing under both Alternative A and Alternative B seems to assume that if the buildings are not immediately along El Camino they would have no negative impact on the views and no mitigation would be required. Given our experience under the previous GUP, I beg to differ. I believe construction of tall buildings in this area has a great potential to further damage what little view is left.

13

6.2.3.16 Responses to Comments from Pria Graves

RI-Graves-1 The intent for Additional Housing Alternative A is for all of the off-campus housing demand created by the Project to be accommodated on-campus. However, the Recirculated Portions of Draft EIR assumes that if the County requires Stanford to build additional housing under this alternative, the County may allow Stanford to provide off-campus housing to accommodate some or all of that incremental housing demand. This is a decision that would be made by the County Board of Supervisors.

Regarding the impacts to neighboring communities associated with off-campus housing, please see Responses to Comment RA-PA-4.

The comment requesting a stop in Stanford's population increase is acknowledged but does not raise issues concerning the adequacy of the Draft EIR or Recirculated Portions of Draft EIR.

RI-Graves-2 The TDM strategies outlined as part of the No Net New Commute Trips standard would also apply to the proposed Project and both additional housing alternatives. However, as stated on page 2-54 and 2-259 of the Recirculated Portions of Draft EIR, because the housing alternatives would shift a substantial number of commute trips to residential trips, the No Net New Commute Trips standard may not be achieved because TDM measures are not as effective in reducing residential trips, compared to commute trips. As such, the No Net New Commute Trips standard is more likely to be achieved under the proposed Project than under the additional housing alternatives.

Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion of the trip credit methodology, and Topic 7: Average Daily Traffic and Peak-Hour Spreading for information on why trip monitoring for the No Net New Commute Trips program is focused on peak hour traffic.

RI-Graves-3 Please refer to Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard for a discussion of cut-through trips and why they are excluded from the cordon counts.

RI-Graves-4 The process for estimating the proportion of University traffic using College Terrace streets between Stanford Avenue and California Avenue is described on pages 2-201 and 2-202 (Additional Housing Alternative A) and pages 2-404 through 2-406 (Additional Housing Alternative B) of the Recirculated Portions of Draft EIR. The analysis is based on an evaluation of the relative directness and associated time to use alternative routes, including Stanford Avenue to El Camino Real, and an evaluation of the relative daily traffic volumes on roadways providing reasonably direct connections between Stanford Avenue and

California Avenue. The comment regarding traffic diverting to Yale Street – Oxford Avenue when excessive queueing occurs at the Stanford Avenue/El Camino Real signal is noted. This signal is operated by Caltrans in cooperation with the City of Palo Alto, and these agencies are responsible for monitoring and adjusting the signal timing to optimize service for all users. Because El Camino Real serves a high volume of both local and regional trips, lower-volume cross streets sometimes experience longer wait times and queues during peak hours.

- RI-Graves-5 The Recirculated Portions of Draft EIR’s prediction that pedestrian quality of service would be improved results from the provision of pedestrian crossings that would be signal-protected, and does not refer to crossing durations. The signal protection improves safety for pedestrians, as compared to an all-way stop condition where pedestrians and drivers need to negotiate who goes next. It is acknowledged that, with installation of a signal, pedestrians would sometimes need to wait longer to cross than if they crossed at an all-way stop control.

The current intersection design at Bowdoin Street, established in the 1970s, requires bicyclists to use the crosswalks to legally traverse the intersection along Bowdoin Street. Options are available to improve the intersection so that it conforms to current industry standards for bicycle access, which may help reduce poor riding habits. This could include redesigning the barrier on the northbound Bowdoin Street approach to serve bicyclists and provide a stop sign or signalization of the intersection. Any such effort by the City of Palo Alto would be in response to an existing condition, and would not be necessitated by the proposed 2018 General Use Permit. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

- RI-Graves-6 At a planning-level, this mitigation measure appears to be feasible without obtaining additional right-of-way, in which case the pedestrian crossing distance would not change. The possibility of additional right-of-way is mentioned because a detailed design study may indicate this is the case; however, it appears that by removing on-street parking and reducing the lane width, no additional right-of-way would be needed. Regardless, increasing the crossing distance by a few feet due to right-of-way expansion would not substantially affect the bicycle quality of service.

- RI-Graves-7 Mitigation must be related to and proportionate to a project’s impact. As discussed in the Recirculated Portions of Draft EIR, page 2-168, over the long term, cities plan for future turf replacement on a schedule that is needed to accommodate observed increases in park usage. Because turf has a natural life, and must be replaced from time to time regardless of the increase in use caused by this alternative, a one-time turf replacement would be appropriate to offset the impact associated with possible acceleration of turf replacement.

It bears also noting that the recreation impact assessment of additional housing alternatives is conservative. The screening threshold assumes that all of the increased usage takes place on the turf areas (as opposed to paths and other hardscape) and the increased usage is concentrated in terms of time, like a single event. In reality, some park users may not use the turf areas at all, and the increased usage by others may occur over the course of a day.

RI-Graves-8 Please see Master Response 12: Public Schools.

RI-Graves-9 All construction impacts of the additional housing alternatives, including those related to fugitive dust and noise, are adequately addressed and mitigated in the Recirculated Portions of Draft EIR. Please see Impact 7A.2-2 (page 2-71) and 7B.2-2 (page 2-276) for how the Recirculated Portions of Draft EIR addresses fugitive dust for Additional Housing Alternatives A and B, and mitigates the impact to a less-than-significant level through implementation of BAAQMD-identified best management practices for controlling particulate emissions.

The BAAQMD-identified best management practices in Mitigation Measure 7A.2-2 and Mitigation Measure 7B.2-2 require exposed surfaces shall be watered two times per day. The application of this measure is typically on construction work days. Regarding comment's request for watering to be included on non-construction workdays, this will be considered by the County decision-makers prior to considering Project approval.

The BAAQMD-identified best management practices in Mitigation Measure 7A.2-2 and Mitigation Measure 7B.2-2 require a response and corrective action to dust complaints within 48 hours. Regarding the comment's request that responses to dust complaints should instead be within one or two hours, this will be considered by the County decision-makers prior to considering Project approval.

Please see Impact 7A.11-1 (page 2-144), Impact 7A.11-2, (page 2-146), Impact 7A.11-3 (page 2-148), Impact 7B.11-1 (page 2-347), Impact 7B.11-2, (page 2-349), and Impact 7B.11-3 (page 2-352), for how the Recirculated Portions of Draft EIR addresses construction noise effects for Additional Housing Alternatives A and B, and mitigates the impact to a less-than-significant level through implementation of construction noise control measures, and a noise control plan for on- and off-site receptors.

Pursuant to CEQA Guidelines, Section 15097 a Mitigation Monitoring and Reporting Program (MMRP) will be prepared and presented to the County Board of Supervisors at the time of certification of the Final EIR. It will identify the specific timing, and roles and responsibilities, for implementation of adopted mitigation measures.

- RI-Graves-10 Operational noise impacts for Additional Housing Alternatives A and B were analyzed in Impact 7A.11-4 and 7B.11-4 in the Recirculated Portions of Draft EIR. These impacts note that new development under these alternatives would be required to comply with the noise restrictions of the County noise ordinance, which are more stringent at night.

The impact analysis conservatively assumed that mechanical equipment operation and loading dock activity from new development under these alternatives could increase noise levels at the nearest off-site sensitive receptor by more than the 6 dBA allowed by the City of Palo Alto Noise Ordinance and create a noticeable increase in ambient noise levels above baseline noise levels. Consequently, increased noise from building mechanical equipment under these alternatives was identified as a significant impact. As mitigation for off-site operational noise impacts (see Mitigation Measure 7A.11-4 and 7B.11-4), the EIR applied the most stringent noise standards of the adjacent jurisdictions, which are those of the City of Palo Alto. Furthermore, in the mitigation measure, testing of emergency generators was limited to the hours of 7:00 a.m. to 7:00 p.m. These and other measures identified in these mitigation measures would ensure that operational noise would be mitigated to a less-than-significant level.

- RI-Graves-11 The significance standard for lighting impacts in the Draft EIR is whether the Project would “[c]reate a new source of *substantial* light or glare that would adversely affect day or nighttime views in the area. [Draft EIR, p. 5.1-11 (emphasis added).] Any new development on the Stanford campus, whether under the proposed Project or the Alternatives, would more than likely result in some new lighting for safety and security purposes at a minimum. Any project proposed on-campus that would undergo ASA review would be required to submit a lighting plan for approval by the County that would seek to limit the amount of off-site lighting created by specific building projects (as more fully described for the Project in Mitigation Measure 5.1-4 on Draft EIR page 5.1-18, for Additional Housing Alternative A in Mitigation Measure 7A.1-4 on Recirculated Portions of Draft EIR page 2-68, and for Additional Housing Alternative B in Mitigation Measure 7B.1-4 on Recirculated Portions of Draft EIR page 2-273).

- RI-Graves-12 No academic development or housing that would be developed under the additional housing alternatives would occur in a designated wildland area. The County designates all areas within the Academic Growth Boundary, including areas where additional housing would be developed under the Additional Housing Alternatives A and B, as non-wildland/non-urban. As discussed in the Recirculated Portions of Draft EIR, Impacts 7A.8-9 and 7B.8-9, development under these alternatives would be required to include fire suppression design requirements as specified in current adopted building codes. Implementation of applicable fire and building code standards would ensure that adequate fire and

life safety measures are incorporated into the Project in compliance with all applicable state and local fire safety regulations. All the above factors would assure that the potential impact associated with exposure of people and property to risk involving wildland fires would be less than significant.

- RI-Graves-13 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 Quarry housing 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 pages 2-64 and 2-65 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 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. Please also see Response to Comment RA-PA-11.



Stanford University 2018 General Use Permit
Form to Comment on Recirculated Portions of Draft EIR

COMMENTS

(Please print clearly and legibly)

*Please hand in during the meeting or mail (address on back) or email by **July 26, 2018**.*

Name: Karen Grove

Organization (if any): _____

Address (optional): _____

City, State, Zip: Menlo Park, CA 94025

E-mail: _____

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

Comments (Please print clearly and legibly)

I support Alternative A
Yes, the additional housing will bring
traffic impacts, but we can
and must find new+ creative and
sustainable ways to mitigate that
impact, no wish it away.

(More space on reverse side)

6.2.3.17 Responses to Comments from Karen Grove

RI-Grove-1 These comments do not directly address the adequacy of the Draft EIR or Recirculated Portions of Draft EIR; consequently, no response is required. However, the Recirculated Portions of Draft EIR addresses all potential traffic related impacts of the additional housing alternatives, and identifies mitigation to reduce impacts to the extent feasible. The commenter's preference for the Additional Housing Alternative A is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.

Comment Letter RI-Hawthorne

From: [Jeff Hawthorne](#)
To: [Rader, David](#)
Subject: Stanford GUP comments
Date: Wednesday, July 25, 2018 3:24:57 PM

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

Dear Mr. Rader

In response to Stanford's proposed academic expansion or GUP, I want to reiterate the need for Stanford to adequately address the costs to the city of Palo Alto and county of Santa Clara associated with the impact of the proposed expansion.

While there are, many potential impacts associate with the proposed expansion, my main concerns are twofold. One is the direct and in-direct traffic related impacts and second is the impact to the PAUSD.

Traffic-related impacts.

The city of Palo Alto has questioned the methodology and feasibility of the No Net New Commute Trips mitigation outlined in the current DEIR. Regardless of trying to predict future growth impacts, I believe there is already a significant impact today from Stanford commute traffic on Palo Alto transportation infrastructure. Steps should be taken today to address the current traffic impacts and adequately plan and prepare for future growth. Most traffic routes into Stanford are at capacity during commute times. Embarcadero Rd, Churchill Ave, Oregon Expressway, Page Mill Rd, Alpine Rd, Junipero Serra Blvd and Stanford Ave all experience significant backups during commute times with traffic clearly flowing into Stanford during the morning hours and out of Stanford during the evening hours.

Attached photograph looking west on Churchill Ave on Tuesday 8:45 AM. Traffic is backed up from El Camino to the pedestrian crosswalk at Palo Alto High School.

Improvement projects and the required funding should be addressed today to improve traffic flow on the aforementioned roads.

While the proposed development may or may not result in No Net New Commute Trips, it will certainly generate additional day trip local traffic as new families and students access local schools, shopping centers and other city facilities. Plans and funding to improve the local transportation infrastructure to accommodate an increase in local day traffic must be included in the plan.

For example, the Marguerite shuttle system is grossly underutilized by the Stanford community. Perhaps, coordination and enhanced connections between the Marguerite and City Shuttles should be addressed to improve access and ridership. Other actions could entail requiring that some portion of the Stanford undergraduate population not be allowed to have a vehicle on campus.

Potential Impacts to PAUSD

The project documentation does not address how Stanford will help to fund the cost of educating over 2,500 new potential students. Much of the proposed expansion is on Stanford land that is exempt from paying property tax. PAUSD operations are funded directly by property taxes. The burden of paying to educate over 2,500 new Stanford family students would fall on Palo Alto residences and could exceed \$51 million annually.

For every 400-500 new elementary students generated by Stanford, PAUSD would have to build an

Comment Letter RI-Hawthorne

additional neighborhood school, with each requiring a 3-4 acre site. The RDEIR “ignores the secondary potential environmental impacts associated with this new development that would be needed as a direct result of Stanford’s development.” The project documentation also does not address how Stanford would help to fund the longer-term capital for new school facilities.

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cont.

Funding

According to the affordable-housing fee “nexus” study, the cost to provide affordable housing to support Stanford University’s proposed campus expansion would be \$143 per square foot — or about \$325 million for the 2.275 million square feet of academic development the university is planning through 2035.

Several issues:

- 1) It is not clear that this funding would adequately address the necessary traffic flow and overall transportation infrastructure improvements. Many of which are needed today, not by 2035.
- 2) It does not address funding required for the potential impact to PAUSD.

4

Regardless of these issues, Stanford is fighting the \$143 per square foot funding level proposed by the study and the county. Stanford has reluctantly increased its offer of affordable housing funds to Santa Clara County from \$45.5 million to \$56 million which amounts to \$24.61 per square feet. Well below the target proposed by the county.

While Stanford brings many tangible and intangible benefits to the city of Palo Alto and the county of Santa Clara, they have not paid their share for utilizing the infrastructure of Palo Alto and Santa Clara County. Santa Clara County and Palo Alto must work together to ensure that Stanford adequately address funding requirements for transportation infrastructure improvement and PAUSD funding as part of the approval for their expansion plan (GUP).

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Now is the time to hold Stanford accountable.

Sincerely

Jeff Hawthorne



6.2.3.18 Responses to Comments from Jeff Hawthorne

RI-Hawthorne-1 Due to lack of specificity in the comment, no specific response is possible. However, please see the individual responses to comments that follow, below.

RI-Hawthorne-2 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. By evaluating the worst condition within the peak period, the analysis ensures that the maximum effect of the proposed Project is identified, and if mitigation is warranted, that the mitigation is designed to prevent the maximum effect from occurring (which in turn prevents impacts under conditions that are not at the maximum).

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

The Marguerite serves over 3.2 million riders per year (both Stanford and non-Stanford affiliates) and Stanford continuously assess the routes and utilization of routes to ensure that the shuttles are not underutilized. Because the Marguerite shuttle is a private shuttle system, the capacity and route planning are evaluated by Stanford and capacity is expanded when Stanford determine there is sufficient demand. According to the Palo Alto Transit Vision (March 2017), the Palo Alto City Shuttle is designed to supplement the Valley Transportation Authority Transit by connecting residential areas to key employment, shopping, recreation, and school destinations in Palo Alto. The two shuttle services serve different purposes, but do connect with one another at the Palo Alto Transit Center.

Stanford does employ parking restrictions as part of its transportation demand management program, and reviews those restrictions periodically. Currently, freshmen are not allowed to have a vehicle on campus. As noted on page 10 of Appendix PKG in the Draft EIR, undergraduate parking declined by about 38 percent between 2003 and 2015. The undergraduate student residential parking permits-to-beds ratio fell from 0.37 to 0.23. While there does not appear to be a current need to further restrict undergraduate parking permits, that mechanism is one that could be used by Stanford in the future.

RI-Hawthorne-3 Please see Master Response 12: Public Schools in this Response to Comments Document.

Based on information in the EIR, and supplemental PAUSD enrollment forecast information, sufficient capacity in PAUSD elementary, middle and high school categories would likely exist to accommodate Stanford's estimated new students that would be generated by the additional housing

alternatives over the course of the proposed 2018 General Use Permit. The EIR concludes the additional housing alternatives would not result in a substantial adverse project or cumulative impact associated with the provision of new or altered public school facilities, the construction of which would cause significant environmental impacts, and consequently, the impact was determined to be less than significant.

It would be speculative to analyze impacts of potential future school construction in this EIR. The EIR does however, discuss potential options the PAUSD has for accommodating future students, and acknowledges that any expansion and/or construction would be subject to separate environmental review.

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.

RI-Hawthorne-4 The amount of the affordable housing fee is a socioeconomic issue not required to be analyzed under CEQA. The County Board of Supervisors, as the decision-making body for the 2018 Stanford General Use Permit, will determine any in-lieu fee paid by Stanford for affordable housing demand generated by its academic development. Please see Master Response 10: Affordable Housing, Topic 3: Future Contribution to Affordable Housing Fund.

Regarding impacts to schools, 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.

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

If Stanford does not achieve the no net new commute trips standard, Stanford will be required to provide fair share funding for transportation mitigation. The Santa Clara County Planning Office under Mitigation Measure 5.15-2 would apply funds collected from Stanford to one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding

such improvements. If the use of the funds for intersection improvements is infeasible, the County would apply the funds to other trip reduction programs in the local impact area.

RI-Hawthorne-5 Due to lack of specificity in the comment, no specific response is possible. However, please see the individual responses to comments, above, regarding funding for transportation and school improvements.

Comment Letter RI-Hennessee

From: [Peggy Hennessee](#)
To: [Rader, David](#)
Cc: [Peggy Hennessee](#)
Subject: Stanford expansion plans
Date: Thursday, July 26, 2018 12:11:01 PM

Dear David,

I am a sustaining member of the Committee for Green Foothills and a resident of Los Altos. The Committee has just made me aware of Stanford University's plans for expansion over the next 18 years.

According to the Committee's newsletter which quotes the County's Draft Environmental Report, Stanford's proposed expansion will increase the number of students, staff and faculty at the University without providing commensurate, adequate increases in regional housing, roads, utilities, etc.

Area infrastructure is already horribly inadequate to the number of people using it. I'm asking you to prevent the worsening of an already intolerable situation by denying Stanford's proposal for unsupported commercial development..

Thank you for your consideration.

Regards,

Peggy Hennessee

[REDACTED]

1

6.2.3.19 Responses to Comments from Peggy Hennessee

RI-Hennessee-1 Due to lack of specificity in the comment, no specific response is possible. However, Draft EIR Section 5.12, Population and Housing, 5.15, Transportation and Traffic, and Section 5.16, Utilities and Service Systems adequately addressed all Project and cumulative impacts to housing, roads and utilities, and identified mitigation as needed to reduce impacts to the extent feasible. Similarly, the Recirculated Portions of Draft EIR Section 7.4.4 and 7.4.5 adequately addressed those same topics for Additional Housing Alternatives A and B, respectively.

Comment Letter RI-Hetterly

July 26, 2018

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

Re: Stanford GUP DEIR

Dear Mr. Rader,

I am writing to express my concern about the impacts of Stanford's proposed expansion and the insufficiency of both analysis and mitigations shown in the recirculated DEIR for their GUP Application.

1

I much appreciate the County's efforts to improve public awareness of the wide reaching local impacts of generating housing to meet the demand created by the project. The County's housing impact fee nexus study and analysis of Alternatives A and B add sunlight to the costs and environmental impacts associated with housing expansion that was glaringly absent in the original DEIR. And it is useful to understand the unique challenge of mitigating traffic impacts posed by housing (as opposed to commuters), even in a transit- and TDM-rich environment like the Stanford campus.

2

Unfortunately, by failing to apply the same level of scrutiny to the base project, the recirculated DEIR remains deficient. The public remains in the dark about the full range of impacts from new housing in surrounding communities necessitated by Stanford's project proposal. There is no specificity as to how that housing need would be distributed nor the feasibility of development in targeted communities. Of particular concern is the lack of data and analysis regarding the base project's localized impacts (from new off-campus housing) on school enrollment, transportation infrastructure, VMT, air quality, traffic and safety.

3

Beyond a conclusion that, like Alternatives A and B, the impacts will be significant (and not borne by Stanford) this deficiency makes it impossible for the public to compare the alternatives to the base project, evaluate the sufficiency of identified mitigations, or propose additional or alternative mitigations targeted to the impacts. Similarly, the absence of an alternative that analyzes a smaller project (as opposed to no project) makes it difficult to assess whether an incremental approach in terms of size or pace could make mitigations more effective or the project more palatable.

4

I support the comments submitted by the Palo Alto Unified School District and the City of Palo Alto and incorporate them by reference. In addition, I incorporate my earlier comments to the original DEIR and refer you to a July 8, 2018 article I authored in the *Palo Alto Matters* newsletter:

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<https://paloaltomatters.org/should-stanford-meet-housing-demand-it-creates/>

6.2.3.20 Responses to Comments from Jennifer Hetterly

- RI-Hetterly-1 Due to lack of specificity in the comment, no specific response is possible. However, please see responses to individual comments regarding how impacts and mitigation were addressed, below.
- RI-Hetterly-2 These comments pertain to the nexus study and inclusion of analysis of Additional Housing Alternatives A and B. These comments do not raise issues concerning the adequacy of the environmental analysis in the Recirculated Portions of Draft EIR, and no further response is required.
- RI-Hetterly-3 Regarding comments about specificity of the distribution of off-campus housing that would result from housing demand associated with the proposed Project, data and analytic methods do not exist to forecast with certainty where all off-campus housing would be located, nor does Stanford or Santa Clara County have the legal ability to control where all off-campus housing would be located. Off-campus housing demand was quantified to the extent possible on pages 5.12-17 through 5.12-21 of the Draft EIR, and assumptions were made regarding distribution within jurisdictions based on past trends. Under these circumstances, it was appropriate for Impact 5.17-1, Impact 7A.17-1 and Impact 7B.17-1 to make reasonable assumptions based on substantial evidence about where off-campus housing could be located, and what the indirect impacts of such housing generally would be. As these impact analyses state, the recent general plan EIRs prepared by “the cities of Palo Alto, Menlo Park, and Mountain View provide a representative analysis of the indirect impacts that would more broadly occur among the Bay Area jurisdictions.”. Although these impacts generally discuss impacts associated with population growth in these communities, data and analytic methods do not exist to precisely predict how much of this population and associated housing growth would be indirectly “caused” by the proposed Project and additional housing alternatives.
- The comment also asserts that the EIR lacks data and analysis of the localized impacts of the new off-campus housing associated with the proposed Project and/or additional housing alternatives. Data and analytic methods do not exist to precisely predict what portion of these impacts would be indirectly “caused” by the proposed additional housing alternatives or the site-specific locations of these impacts.
- Please see Response to Comment RO-Goldfarb-3 for additional information on this topic.
- RI-Hetterly-4 Regarding the comment about a perceived deficiency in the EIR analysis of the Project and additional housing alternatives, please see Response to Comment RI-Hetterly-3, above. Regarding the sufficiency of identified mitigation, it is similarly not possible to develop more specific mitigation measures to reduce those impacts. Also, the County does not have the authority to mitigate impacts

associated with housing development in other jurisdictions, and CEQA does not grant the County such authority. See Public Resources Code Section 21004.

The County can commit to and enforce feasible mitigation measures that are within its responsibility and jurisdiction. However, the County would not be the lead agency for housing projects in other jurisdictions. In this instance, the County in its CEQA findings may find that those measures are 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 discussions of Impact 5.17-1, Impact 7A.17-1 and Impact 7B.17-1 recognize that, given uncertainties in the specific location and type of off-campus housing it is also uncertain if feasible mitigation would exist to reduce all significant environmental impacts to a less-than-significant level. Further, the County cannot require or guarantee that local governments would implement mitigation measures for off-campus housing included in or required by General Plan EIRs. For these reasons, the impact was determined to be significant and unavoidable.

Regarding a smaller project alternative, this is addressed in the Draft EIR Chapter 7 Alternatives, page 7-23 to 7-33.

- RI-Hetterly-5 The comment does not raise any issues addressing the adequacy of the Draft EIR or Recirculated Portions of Draft EIR; no response is required.

Comment Letter RI-Ida

Jim Ida
975 Monte Rosa Drive
Menlo Park, CA 94025
jimida@yahoo.com
(650) 854-7827

Via Email (David.Rader@pln.sccgov.org) and Regular Mail

July 26, 2018

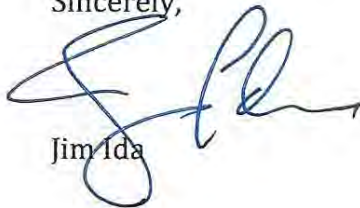
Mr. David Rader
Santa Clara County Planning Office
County Government Center
70 W. Hedding Street, 7th Floor, East Wing
San Jose, CA 95110

Subject: Draft Environmental Impact Report
Stanford 2018 General Use Permit Application

Dear Mr. Rader,

Thank you to you and your staff at Santa Clara County for requesting comments from the community. I would like to add my comments to the record. My wife, Carol, and I are residents of southern San Mateo County and are among those frustrated by Stanford's continued expansion without addressing meaningful traffic redress. The DEIR fails to adequately address the significant traffic impacts to those residents, students, and workers who rely on the already congested major arteries and many internal residential streets surrounding the campus. My particular concern is that the impacts to neighborhoods on the San Mateo County border are not adequately addressed. For instance, the significantly increased congestion along Sand Hill Road is evidence that non-roadway mitigation measures over the past 10+ years have not worked. In a long-range plan roadway widening requirements must be considered and hopefully included. I realize that it is a costly and a complex process, but I encourage Santa Clara County and Stanford to be strong and fair leaders of the community and not ignore or band aid obvious problems and to work proactively with neighboring cities.

Sincerely,



Jim Ida

6.2.3.21 Responses to Comments from Jim Ida

RI-Ida-1 Traffic impacts for the proposed project are discussed beginning on page 5.15-68 of the Draft EIR, and for the additional housing alternatives on page 2-175 (Additional Housing Alternative A) and page 2-379 (Additional Housing Alternative B) of the Recirculated Portions of Draft EIR.

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

If Stanford does not achieve the no net new commute trips standard, Stanford will be required to provide fair share funding for transportation mitigation. The Santa Clara County Planning Office under Mitigation Measure 5.15-2 would apply funds collected from Stanford to one or more of the intersection improvements identified in the Draft EIR. The County Planning Office will consult with affected jurisdictions to determine the priority order for funding such improvements. If the use of the funds for intersection improvements is infeasible, the County would apply the funds to other trip reduction programs in the local impact area.

The comment regarding roadway widening on Sand Hill Road is noted. The comment will be considered by the County as part of the review process.

Comment Letter RI-Kortlander

From: [anne kortlander](#)
To: [Rader, David](#)
Subject: Stanford Land Use
Date: Wednesday, July 25, 2018 4:52:36 PM

I am writing to urge the County of Santa Clara to require Stanford — as part of its requested General Use Permit — to build housing to accommodate all of the proposed expansion of students, faculty and staff on campus.

Stanford University occupies one of the 10 largest university campuses in the country. At over 8,000 acres, there is still plenty of room to accommodate housing for these people.

As a homeowner less than 4 miles from the Stanford campus, I've experienced the traffic congestion, noise and degraded air quality caused by commuters passing through our area. At the level of people-increase that Stanford is proposing, these bad effects will only multiply exponentially.

I request you to require housing for all as part of the GUP.

Thank you,

Anne Kortlander

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6.2.3.22 Responses to Comments from Anne Kortlander

RI-Kortlander-1 The Recirculated Portions of Draft EIR includes Additional Housing Alternative A. Under this alternative, it is assumed that the additional demand would be met by constructing additional on-campus housing. In addition to the proposed on-campus housing that would be provided under the proposed 2018 General Use Permit (3,150 units/beds), this alternative would also provide additional 2,549 units/beds of on-campus housing, equivalent to the net increase in off-campus housing demand that would occur under the proposed Project. Thus, Additional Housing Alternative A includes the provision of a total of 5,699 new on-campus housing units/beds.

The Draft EIR Section 5.2 Air Quality, Section 5.11 Noise and Vibration, and Section 5.15 Transportation and Traffic address all Project and cumulative effects on air quality, noise and traffic congestion and mitigate those effects to the extent feasible. Similarly, the Recirculated Portions of Draft EIR Sections 7.4.4 and 7.4.5 address those effects for the Additional Housing Alternatives A and B, respectively.

The commenter's preference for Additional Housing Alternative A is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.

Comment Letter RI-Leonard

From: [jackie leonard-dimmick](#)
To: [Rader, David](#)
Subject: "The Almanac " article
Date: Friday, June 29, 2018 3:27:56 PM

Dear Mr.Rader:

I have been reading articles in "The Almanac" about how Stanford is proposing to expand its material walls of academics. The latest article "Study Highlights Impacts of Adding Stanford Housing", by Gennady Sheyner (6/27/18). Is there not a facility on campus, (Stanford Woods Institute), whose goal is to help destroy the effects of global warming and rising tides?

Building more facilities for teaching and more housing for more students to live in seems contradictory to the above organization. Should there be a need for more educational facilities, why not cut back on enrollment of students and turn one or more dorms/apartments into housing for instructors and present employees at Stanford?

The Bay Area is exploding from too many people and unaffordable housing. It appears Stanford - and other cities want to add to the problem. We all need to express more conservation and sustainability in our daily lives. Packing people and various forms of matter into a finite space of land is not expressing common sense. Businesses can help this situation by hiring most all employees locally. As this happens we will see a continual gradual decline in the cost of housing as population becomes balanced. As this happens we will all see and feel a greater sense of harmony around us - people and animals alike.

Thank you for letting share these thoughts with you.

Jackie Leonard-Dimmick

6.2.3.23 Responses to Comments from Jackie Leonard-Dimmick

- RI-Leonard-1 A suggestion is made to reduce enrollment and convert existing dormitories/apartments into housing for instructors and employees at Stanford. This alternative would not meet most of the basic project objectives, and therefore need not have been evaluated in detail in the Draft EIR. Please also see Master Response 8: EIR Alternatives, Topic 1: CEQA Requirements for Alternatives, and Alternatives Evaluated in the EIR.
- RI-Leonard-2 These comments do not address the adequacy of the Draft EIR or Recirculated Portions of Draft EIR. Additionally, please note that housing affordability is a socioeconomic issue not required to be analyzed in the Draft EIR or mitigated under CEQA.

Comment Letter RI-Machado

From: [Paul Machado](#)
To: [Rader, David](#)
Date: Thursday, June 14, 2018 9:41:56 AM

The adverse effects on the cities infrastructure, schools, congestion etc. could be well beyond projections. Electrification of Cal Train will not solve problems this huge project would create. It would take MUCH more investment by Stanford to mitigate the adverse effects. Merely passing the problems on to taxpayers is not acceptable. Taxpayer fatigue is only starting.

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Thank you
P Machado

6.2.3.24 Responses to Comments from Paul Machado

RI-Machado-1 General comments are made regarding adverse effects on city infrastructure, schools, and congestion. Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.

However, Draft EIR Section 5.13 Public Services, Section 5.15 Transportation and Traffic, and Section 5.16 Utilities and Service Systems address all Project and cumulative impacts on schools, traffic and utilities and service systems associated with the construction and operation of the proposed Project, and identify mitigation that reduces significant impacts to the extent feasible. Similarly, the Recirculated Portions of Draft EIR Sections 7.4.4 and 7.4.5 address those effects for the Additional Housing Alternatives A and B, respectively.

Regarding electrification of Caltrain, please see Master Response 13: Transportation and Traffic, Topic 12: Transit and Bicycle Capacity.

Comments made regarding taxes are comments on socioeconomic issues not required to be analyzed in the Draft EIR.



County of Santa Clara
Department of Planning and Development

Stanford University 2018 General Use Permit
Form to Comment on Recirculated Portions of Draft EIR

COMMENTS

(Please print clearly and legibly)

Please hand in during the meeting or mail (address on back) or email by July 26, 2018.

Name:

Stephanie Muñoz

Organization (if any):

WILPF (Women's International League for Peace and Freedom)

Address (optional):

[Redacted]

City, State, Zip:

Palo Alto, CA 94301

E-mail:

[Redacted]

This comment form is being furnished to obtain comments and questions from the public on the **Recirculated Portions of the Stanford University 2018 General Use Permit Draft EIR**.

All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

Stanford's opposition to housing 100% of its students, faculty, staff
and workers in its tenants' businesses is dismaying. All levels of
government aim to adjust expectations of "the government" to each other.
But the proposal to create jobs in an area where there is no housing
is unreasonable. Most of the opponents are looking at the humane
problems: workers who are paid modest wages are forced out of
rentals so that better paid newcomers can occupy the homes they
were renting - they are living on the street (example --- me, 3rd, observant
But even setting aside humane concerns this is not a feasible plan.

(More space on reverse side)

over.



County of Santa Clara
Department of Planning and Development

If you have a hundred seats in your restaurant, and you buy and cook food for a hundred diners, you have to have enough plates and silverware. To have the diners come, and stand in the vestibule, hungry, because you have only 50 place settings, is preposterous. Not business-like. We have already seen this happen. In the '60s, after the USSR put up Sputnik, Prof. Terman the younger saw an opportunity to utilize Stanford's undeveloped farm land, with the abundance of talent, mathematics and scientific skill, to make the sine qua non of technical centers. And they did.

[We should mention that Mrs. Stanford's intention was other: the Stanford's already had all the money and power, governor, senator, the Railroad. She wanted to create a population which would recreate the promise of her dead child. In fact, she rejected offers of financial help which would dilute the sacredness of her creation.]

Palo Alto obligingly re-zoned the Stanford foothills from housing to industrial. Palo Alto filled up, and the surrounding towns filled with newly built houses replacing orchards. The toxic emissions from automobiles naturally increase as the cars passing by increase. We residents have had to give up our fireplaces, our old economical cars, and ~~the~~ our mobility.

It is at best disingenuous, to claim that housing workers on campus would have as great or greater impact as not having it - Has could that possibly do. Yes schools are essential and Stanford could have its own elementary, and even high schools. Every other destination is optional,

Send comments to:

David Rader, Senior Planner

County Government Center, East Wing, 7th Floor

70 W. Hedding Street, San Jose 95110

david.rader@pln.sccgov.org

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cont.

6.2.3.25 Responses to Comments from Stephanie Munoz

RI-Munoz-1 Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Nigenda

From: [E Nigenda](#)
To: [Rader, David](#)
Subject: Comments on the revised DEIR for the Stanford GUP
Date: Thursday, July 26, 2018 2:02:34 PM

Dear Board of Supervisors,

On page 4 of the APPENDIX ALT-WSA Water Supply Assessment for the Stanford 2018 General Use Permit EIR Analysis of Housing Alternatives we find the following statement:

Groundwater is assumed to be used to meet remaining potable demands in excess of the SFPUC supply. For non-potable (irrigation) use, surface water is assumed to be the primary source, with groundwater meeting the remaining demand.

It is my understanding that most, maybe all, nearby local entities plan to use groundwater as a supplemental water source during a drought. However, there is no regional plan that I am aware of that establishes sustainable, agreed-upon groundwater allocations for each of these entities.

In addition, to protect some of our valuable ecosystems, the State Water Board on July 6, 2018 [proposed](#) an increase in the flow requirement of several rivers including the Tuolumne, the source of water for the SFPUC, Stanford's potable water supplier. This increase in flow requirement will likely result in a reduction in potable water allocations from the SFPUC. The revised DEIR does not reflect the possibility of this reduction.

With such unknowns, it is difficult to determine whether there will be enough water available to meet the on-going needs of this project. Please request that Stanford address these issues thoroughly.

Thank you for your countless hours on this project and your outreach to the community, Esther Nigenda, Ph.D.

Member, Save Palo Alto's Groundwater

www.SavePaloAltosGroundwater.org

6.2.3.26 Responses to Comments from Esther Nigenda, Ph.D.

RI-Nigenda-1 In support of the EIR, a Water Supply Assessment (WSA) was prepared for the additional housing alternatives (see Appendix ALT-WSA in the Recirculated Portions of the Draft EIR). The results for Additional Housing Alternative A are summarized in the Recirculated Portions of the Draft EIR Section 7.4.4, Impact 7A.9-4 (page 2-135) and Impact 7A.16-1 (page 2-246). The WSA and Recirculated Portions of the Draft EIR report that under normal water conditions, Stanford's potable water supply allocation from the SFPUC would be sufficient to accommodate the potable water demand for Additional Housing Alternative A without needing to supplement potable water with treated groundwater. As indicated in the comment, and as reported in WSA and the Recirculated Portions of the Draft EIR, in single and multiple dry water year scenarios, Stanford would need to supplement its potable water supply from SFPUC with treated groundwater for Additional Housing Alternative A.

However, as also discussed in Impact 7A.9-4 and Impact 7A.16-1, under all water year scenarios, the total groundwater demand for Additional Housing Alternative A would not exceed 1.35 mgd. The EIR discusses that Stanford can withdraw up to 1.52 mgd from its wells without adversely affecting groundwater conditions. As a result, similar to the conclusion reached for the proposed Project in the Draft EIR, the Recirculated Portions of Draft EIR finds that the projected groundwater use for this alternative could be safely withdrawn without causing excessive drawdown in the aquifer. Additionally, as noted in the EIR, Stanford could implement more stringent water conservation measures beyond those implemented historically to further minimize increases in groundwater use.

In addition, as explained in more detail in Response to Comment RA-SCVWD-3, in 2016, Stanford completed a sustainable groundwater pumping investigation as part of an overall strategy of integrating groundwater with local surface water and imported water to meet water requirements at the campus (Luhdorff and Scalmanini, 2016; see Appendix PMP in this Response to Comments Document). The findings in this technical report also support the basis that groundwater demand of the proposed and additional housing alternatives could be safely withdrawn without causing excessive drawdown in the aquifer, even under prolonged drought conditions.

As the response demonstrates above, increased pumping at Stanford can be managed sustainably at levels that do not cause groundwater levels to chronically decline. Nevertheless, while the estimated rate of sustainable pumping at Stanford is only a small fraction of the operational storage of the Santa Clara Subbasin, it underscores the need for long-term balanced pumping and recharge within the San Francisquito Cone irrespective of broader basin management activities by Santa Clara Valley Water District.

- RI-Nigenda-2 The comment references a media release from the State Water Resources Control Board (SWRCB) regarding its Final Draft Bay-Delta Plan Update for the Lower San Joaquin River and Southern Delta. It is speculative at this time as to what, if any, effect that SWRCB on-going planning effort may have on how SFPUC allocates its wholesale potable water supply to its customers, including Stanford, in the future. Regardless, based on the WSA prepared for the Additional Housing Alternatives, and Stanford’s sustainable groundwater pumping investigation, even in the event SFPUC were to reduce potable water supply to Stanford in the future, there would be substantial surplus groundwater pumping capacity at Stanford such that additional groundwater could be sustainably withdrawn to supplement Stanford overall water needs without causing excessive drawdown in the aquifer.
- RI-Nigenda-3 Please see Response to Comments RI-Nigenda-1 and RI-Nigenda-2, above. The Draft EIR and Recirculated Portions of Draft EIR finds that sufficient potable water, surface water and groundwater supplies are available to adequately serve the proposed Project or the additional housing alternatives.

Mary O'Kicki

July 26, 2018

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

Re: Comments on Stanford GUP Revised Draft EIR

Dear Mr. Rader,

Thank you for the opportunity to comment on the Stanford General Use Permit (GUP) Revised Draft Environmental Impact Report (EIR).

The number of comments from the community and the interest that this proposed Project (Project) generated at public meetings highlights the need for County oversight of all of Santa Clara County cities' developments. The cities need to work with each other, the members of their communities, and the County to develop a county-wide housing plan that addresses all of the communities' concerns for affordable housing, decreased traffic congestion and open space and parks. Guidelines and goals for each City are not generating results. Legislation being proposed at the state level indicates that the State will step in and regulate if the cities are unable to create desirable, inclusive communities that meet the diverse needs of their members. The focus needs to be on County wide oversight and regulation of development, not entity specific County regulation. The former is inclusive; the latter is divisive. The County needs to be a uniting force, not a dividing one.

Analysis of Additional Housing Alternatives A & B is Inadequate

The analysis is inadequate because it does not take into account the social impacts and consequences of implementing a failed housing strategy of the past - developing a company town. A policy discussion of the documented social and economic impacts of creating such a community and then further discussion as to measures that need to be taken to mitigate negative impacts is needed. Unfortunately, the "us" (residents of surrounding

communities) versus "them" (residents of Stanford) company town mentality has begun as comments during public meetings demonstrate as well as upset regarding information contained on a flyer.

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cont.

A Palo Alto elected official created and circulated a flyer at a public meeting that he said was designed to raise awareness concerning the potential for a shortfall in school funding if many children who attended PAUSD lived in Stanford owned housing that was property tax exempt. He stated that under Alternative A, more than "1800+" new students could enter the school system without the needed \$34 million in property tax revenue to support them. Certainly, public school funding is a critical issue and no one could fault this person for being concerned and for wanting people to be aware of the hypothetical consequences of one of the Alternatives in the Revised Draft EIR.

Unfortunately, this flyer, which was referenced in a letter to the editor was entitled, "Stanford – Do Your Fair Share for Our Schools" implied to some people that Stanford *currently* is not doing its "fair share" to contribute to Palo Alto's schools. The resulting anger and outrage expressed by some residents that Stanford children were getting a "free ride" was evidenced in the letters to the editors and as well as in online comments. When the flyer was handed out during a public meeting, one elderly woman was so upset that she wanted to know where the elected officials were that would allow Stanford to do this. "Where is the governor?" she called out.

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Were these reasonable responses to the flyer? Were people just "looking" for a reason to be upset? Or are upset people looking for someone or something to blame for their feelings? These are symptoms of the "us/them" mentality.

If people had access to correct information they would know that Stanford children are not getting a free ride at PAUSD; the 930 leaseholders who own their homes pay property taxes just like Palo Altans and Stanford pays property tax on Stanford West and its commercial properties. Yet, when I engaged in conversation with people about the issue and pointed out these facts, I was greeted with skepticism. "I don't think they pay the *same* taxes we do," one person said. "They" being Stanford residents; "we" being Palo Alto residents.

The flyer and the associated upset demonstrates the need for the EIR to examine the social factors surrounding building large amounts of employee housing and then discuss measures to mitigate possible negative impacts to ensure community harmony.

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cont.

Analysis Results & Concerns

The analysis speaks for itself in that it shows neither Additional Housing Alternative A (Alternative A) nor Additional Housing Alternative B (Alternative B) is an environmentally superior alternative to the Project and for this reason alone, both Alternatives should be removed from further consideration by the County.

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Additional concerns raised by both Alternatives include 1) both Alternatives would yield greater environmental impacts than the Project; 2) identified mitigation steps to minimize environmental impacts of both Alternatives are either unreasonable, impractical and/or unwise; and 3) neither Alternative is in line with Stanford's stated objective for County approval of a "2018 General Use Permit that would authorize continued growth and development on the campus in a manner that implements the Stanford Community Plan's policies and that is consistent with the growth assumption in the Sustainable Development Study."

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Greater Environmental Impacts

Increased traffic congestion was probably the single issue of concern that was voiced most frequently at the public meetings that I attended and the analysis shows that traffic congestion and wait times at certain intersections would be even greater under the proposed Alternatives than under the Project itself making both Alternatives undesirable. Additionally, the analyses notes that the No Net New Commute Trips standard may not be achievable under Alternatives A & B which is an important element of the Project. It is understandable that the No Net New Commute Trips standard may not be achievable because, as stated, "Traffic Demand Measures, are not as effective in reducing residential trips, compared to commute trips." This makes sense. People commute to and from work at specific times, therefore routes and incentives can be determined. However, residential trips vary greatly throughout the day and the week. The start times of the trips, the destinations, and the length of time of the trips all vary. Because traffic congestion would

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be worse under Alternatives A & B, both Alternatives should not be considered viable options.

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cont.

Mitigation Measures are Impractical, Undesirable and Unwise

CEQA Guidelines require that feasible alternatives must take into account economic, environmental, social, technological, and legal factors, but do not require that the mitigation measures needed to minimize impacts from these alternatives be practical, desirable or wise. Many of the stated mitigation efforts required to reduce an identified impact to less than significant are impractical, undesirable and unwise. For example, to keep the interior of the campus compact and walkable, which has been identified as a necessary element to create an academic and collaborative environment and to be consistent with the 1985 Land Use Policy Agreement, faculty/staff housing needs to be on the outer edge of the academic campus. Thus the options for placement of the housing units required under both Alternatives are limited and would result in the need to 1) develop lands that are used for recreation fields or detention basins, which then need to be relocated – possibly requiring the need to modify the Arboretum or other Campus Open Space areas; 2) develop housing that not only exceeds 50' in height, but could exceed that amount by two to three times and be up to 135'; and/or 3) alter the El Camino Real Frontage Plan. Though all of these options are technically feasible, there is nothing desirable about constructing a 135' building next to College Terrace. It is completely out of character with the adjacent neighborhood. And, is it practical? Is a ten story apartment complex manageable? Similarly, relocating detention basins, or altering the Open Space or the El Camino Real Frontage Plan are not practical or desirable for obvious reasons.

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Additionally, the increase in housing results in an even greater demand for water. Given that California has not yet recovered from the recent historic five year drought, it is incredibly unwise to develop additional housing that would require Stanford, during a single dry year, or multiple dry years, to supplement its potable water supply with treated groundwater from its wells. Until the State creates the additional storage sheds it approved \$2.5 billion in funding for on July 25, 2018, it is incredibly unwise to require Stanford to plan to need to “supplement” its potable water supply.

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Alternatives Do Not More Fully Support the Project's Stated Goal

Neither Alternative is more in line with, or further supports Stanford's stated Project objective for approval of a "2018 General Use Permit that would authorize continued growth and development on the campus in a manner that implements the Stanford Community Plan's policies and that is consistent with the growth assumption in the Sustainable Development Study," and both conflict with at least one more specific goal which states, in part, "expand[ed] academic and academic support facilities at a growth rate from 2018 through 2035 that is consistent with Stanford's historic annual growth rate for academic and academic support facilities." Implementation of either Alternative would exceed Stanford's historic annual growth rate.

11

Housing and Transportation

Tying housing to jobs limits exploration of alternate economic opportunities because finding a new job means that you must simultaneously find new housing. However, housing and public transportation do go together. Where roads, trains and buses go, housing will develop. Therefore, if the County wants to address the housing crisis, they must also address the lack of available, reliable and affordable public transportation throughout the County.

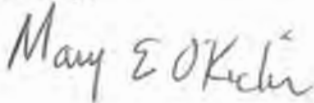
12

Once again, I support the development of affordable housing and public transportation throughout the Bay Area and I greatly support the municipalities working together and with the State to accomplish these goals.

13

Thank you again for the opportunity to comment on the Revised Draft EIR.

Sincerely,



Mary E. O'Kicki

Resident, Palo Alto

6.2.3.27 Responses to Comments from Mary O'Kicki

RI-O'Kicki-1 The general comments regarding the desirability of County-wide oversight and regulation of development with respect to housing are acknowledged, and do not address the adequacy of the environmental analysis in the Draft EIR or Recirculated Portions of Draft EIR.

RI-O'Kicki-2 The general comments made do not address the adequacy of the Draft EIR or Recirculated Portions of Draft EIR. Further, social and economic issues are not required to be analyzed in the Draft EIR. Please see Master Response 1: Non-CEQA Comments.

RI-O'Kicki-3 The Recirculated Portions of Draft EIR (page 2-161) estimates 1,446 new students would be generated by Additional Housing Alternative A; this is less than the estimate of 1,800 students referenced in this comment.

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.

RI-O'Kicki-4 The County elected to include in the Recirculated Portions of Draft EIR additional housing alternatives to assist the public and decision-makers in understanding the implication of development of higher levels of housing on the Stanford campus, and to offer the County the option of selecting one of these alternatives at the conclusion of the CEQA process. The Recirculated Portions of Draft EIR acknowledges that neither of the additional housing alternatives are the environmentally superior alternative; rather, the EIR reports that of the alternatives that are not the No Project Alternative, the Reduced Project Alternative is identified as the environmentally superior alternative.

RI-O'Kicki-5 The Recirculated Portions of Draft EIR acknowledges these additional housing alternatives result in certain greater impacts, including, but not limited to, the topics of transportation and traffic, air quality, noise and recreation. Please see also Response to Comment RI-O'Kicki-6, below, as it relates to transportation impacts.

Please see Response to Comment RI-O'Kicki-7, below, for a response to a similar comment made about the mitigation measures to minimize environmental impacts of the additional housing alternatives.

As discussed in Response to Comment RI-O'Kicki-11, below, the Recirculated Portions of Draft EIR acknowledges that the additional housing alternatives would fail to achieve the primary 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.

- RI-O'Kicki-6 The comment repeats certain information in the Recirculated Portions of Draft EIR, and indicates support for the proposed Project over Additional Housing Alternatives A and B, and does not require a response. The commenter's preference for the proposed Project is part of the public record on the Project, and will be considered by the County decision-makers prior to considering Project approval.
- RI-O'Kicki-7 As discussed in the Recirculated Portions of Draft EIR, page 2-15, CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. The mitigation measures presented in the Recirculated Portions of Draft EIR are considered feasible by the County Department of Planning and Development and the EIR preparers.
- The second sentence in the comment incorrectly refers to factors used to develop the parameters of Additional Housing Alternatives A and B as "mitigation efforts to reduce an identified impact to less than significant." Rather, the Recirculated Portions of Draft EIR described the physical constraints and planning considerations that helped to define the location and characteristics of the additional on-campus housing for Additional Housing Alternatives A and B. The Recirculated Portions of Draft EIR considered plans and regulations governing land use development at Stanford, including the Stanford Community Plan, 1985 Land Use Policy Agreement, and zoning when developing the alternatives. The alternatives descriptions also appropriately disclose that developing the additional on-campus housing would have consequences, including that recreation fields (many of which are also used for stormwater detention) may need to be located elsewhere on campus. The commenter's concerns about the impacts of the additional housing alternatives are noted. Please see also Responses to Comments RI-O'Kicki-8 and RI-O'Kicki-9, below.
- Regardless, the impact analyses that follows the description of each alternative in the Recirculated Portions of Draft EIR identify feasible mitigation measures to reduce significant impacts identified with the additional housing alternatives to the extent possible and feasible.
- RI-O'Kicki-8 As noted in Master Response 1: Non-CEQA Comments, to the extent that the proposed Project could result in significant physical environmental impacts, those effects are addressed and mitigated to the extent feasible in the EIR. Changes in community character are not environmental effects required to be analyzed under CEQA.
- RI-O'Kicki-9 Please see Master Response 1: Non-CEQA Comments.
- RI-O'Kicki-10 With respect to the finding in the Recirculated Portions of the Draft EIR (Impact 7A.16-2) that for Additional Housing Alternative A, in single and

multiple dry water year scenarios, Stanford would need to supplement its potable water supply from SFPUC with treated groundwater, please see Response to Comments RI-Nigenda-1 through RI-Nigenda-3.

RI-O'Kicki-11 This comment summarizes portions of the subsections in the Recirculated Portions of the Draft EIR that describe the ability for each of the additional housing alternatives to meet the project objectives (page 2-258 for Additional Housing Alternative A and page 2-460 for Additional Housing Alternative B). No response is required.

RI-O'Kicki-12 Please see Master Response 1: Non-CEQA Comments.

RI-O'Kicki-13 Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Peak

From: [Tina Peak](#)
To: [Rader, David](#)
Subject: Stanford GUP draft EIR revision
Date: Wednesday, July 25, 2018 8:51:05 PM

Dear Santa Clara Count Planning department,

I'm writing in regard to Stanford's recirculated draft EIR.

It is still abundantly clear that there is no way to mitigate for the amount of growth that Stanford is seeking. A quick review of their growth (on campus) over the last 50 years shows that Stanford doubled in size from 4 million to more than 8 million square feet, between 1960 - 1985. In 1989 they requested and received another 2 million square feet of development. In 2000 they received another 4.8 million square feet of development.

They have not even finished building all of the square footage from the last GUP and already we can see more of the adverse effects from the development. This area is swamped with traffic gridlock, the schools are over crowded, the pollution is awful and the quality of life is diminished. While Stanford's not entirely responsible, they are the largest developer in the Palo Alto area.

Palo Alto has been working hard to responsibly address the over-development crisis that is driving massive congestion and increased housing costs. The city has limited development to try to give the community a chance to "catch up". But this effort is diminished when another entity, on our border, is granted massive development rights.

Now Stanford is back again asking for another 5 million square feet of development. They don't refer to it as 5 million square feet. They try to separate out housing from academic and research buildings, but there are impacts from all types of development. In total there will be more workers, students, traffic, crowding and pollution.

Stanford's EIR itself can't mitigate for the impacts. The impact of housing refers to "construction of off-site housing would result in environmental impacts" that would "disproportionately" affect Palo Alto but doesn't quantify those effects.

The impacts of schools enrollment are massive but Stanford makes no allowance for how they will mitigate for them, despite the fact that they don't pay any taxes to the schools.

The one nice point to this new EIR is that finally Stanford admits that more on campus housing will lead to more traffic. Something we all know from common sense, but that most developers pretend will not happen. There is no way to mitigate for this traffic.

The no net new commute trips mitigation doesn't address the true traffic impacts of the project.

Overall this project is not reasonable. Stanford should not be allowed any more development space. They are full and the surrounding community is full.

If they want to add housing to house more of the people they already attract to their campus, that can be discussed. But they need to pay their fair share. Stanford and its employees use

Comment Letter RI-Peak

this area and yet the campus and housing on it pays no taxes to support the area. Stanford should set aside land for schools and pay to build them and staff them for the benefit of their employee's children. Stanford should also have to fund a large amount of traffic infrastructure in the area that is used by them. They should be part of the solution for trenching for grade separation for Cal-train in advance of electrification. They should have to permanently promise to protect all undeveloped lands outside of the core campus, so that no future development is allowed. And further they should be required to allow public access to much of it as reparations for the overcrowding of the area.

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cont.
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The Stanford area should be viewed in terms of an unbalanced environment, one that has exceeded its carrying capacity. Adding more development is a tragedy for this area and should not be allowed.

Sincerely,
Tina Peak

[REDACTED]

6.2.3.28 Responses to Comments from Tina Peak

RI-Peak-1 Comments regarding existing conditions, including with traffic congestion, school overcrowding, and pollution, and quality of life are not associated with the proposed Project. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios. However, Draft EIR Section 5.2 Air Quality, Section 5.13 Public Services, and Section 5.15 Transportation and Traffic address all Project and cumulative impacts on air quality, public schools and transportation and traffic, and identify mitigation as needed to reduce impacts to the extent feasible. Similarly, the Recirculated Portions of Draft EIR Section 7.4.4 and 7.4.5 adequately addressed those same topics for Additional Housing Alternatives A and B, respectively.

RI-Peak-2 Please see Master Response 1: Non-CEQA Comments.

RI-Peak-3 Due to lack of specificity in the comment, no specific response is possible. However, Draft EIR Section 5.2 Air Quality, Section 5.12 Population and Housing, Section 5.13 Public Services, and Section 5.15 Transportation and Traffic, and Section 5.17 address all Project and cumulative impacts on air quality, population and housing, public schools and transportation and traffic, and identify mitigation as needed to reduce impacts to the extent feasible. Similarly, the Recirculated Portions of Draft EIR Section 7.4.4 and 7.4.5 adequately addressed those same topics for Additional Housing Alternatives A and B, respectively.

RI-Peak-4 As noted on page 2-8 of the Recirculated Portions of Draft EIR, any new off-campus housing constructed as a result of Project demand, or resulting from implementation of the additional housing alternatives, would be required to comply with CEQA prior to consideration of approval by the City of Palo Alto (or any other jurisdiction where such housing would be located). It is unknown at this time the precise locations, configurations and types of off-campus housing that may be constructed to meet demand generated by the 2018 General Use Permit or additional housing alternatives; therefore, quantifying any potential impacts resulting from off-campus housing construction would be speculative.

RI-Peak-5 Due to lack of specificity in the comment, no specific response is possible. However, please see Draft EIR Section 5.13 Public Service which addressed all Project and cumulative impacts on public schools. Similarly, the Recirculated Portions of Draft EIR Section 7.4.4 and 7.4.5 adequately addressed impacts to public schools for Additional Housing Alternatives A and B, respectively. Please also see Master Response 12: Public Schools.

Regarding impacts to schools, 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.

RI-Peak-6 Please see Master Response 1: Non-CEQA Comments.

RI-Peak-7 Please see Master Response 13: Transportation and Traffic, Topic 6: No Net New Commute Trips Standard.

RI-Peak-8 Please see Master Response 1: Non-CEQA Comments.

RI-Peak-9 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. Please also see Master Response 12: Public Schools, Topic 2: Additional School Site.

RI-Peak-10 The Recirculated Portions of Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity, including grade separations. The Draft EIR explains on page 5.15-155 that the Governor’s Office of Planning and Research recognizes that increased demand throughout a region may necessitate new or additional transit infrastructure. However, OPR states such effects may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that locate near transit, but rather across a region to all entities that rely on the entire transportation system.

RI-Peak-11 Due to the lack of specificity in this comment, no specific response is possible. Please see Master Response 3: General Comments on EIR and Environmental Topics.

Comments inquiring about the carrying capacity of the general area are outside of the scope of this EIR. However, the EIR addresses all Project and cumulative environmental impacts, as appropriate. Please see Master Response 2: Non-Project Planning Process, Topic 1: Sustainable Development Study as it relates to future development potential for the University beyond the 2018 General Use Permit.

Comment Letter RI-Pont

From: [Jennifer Pont](#)
To: [Rader, David](#)
Subject: Stanford General Use Permit Draft EIR
Date: Friday, June 29, 2018 3:43:23 PM

Hi -

I am concerned with the lack of mitigation of construction emissions associated with Stanford's expansion plan.
From page 2-9:

Emissions generated during construction associated with individual development projects permitted under the proposed plan also would generate significant levels of criteria air pollutants and toxic air contaminants.

I understand that projects may be individually permitted, but I do not believe that these are unavoidable emissions. I believe that mitigation measures for construction emissions should require the use of new on-road heavy duty trucks delivering and removing construction materials as well as new off-road equipment. Heavy duty off-road equipment should all be equipped with diesel particulate filters as well as SCR for NOx control. Other off-road equipment should be electric drive.

Thank you,
Jennifer Pont
Menlo Park resident

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6.2.3.29 Responses to Comments from Jennifer Pont

RI-Pont-1 The comment quotes an excerpt of Impact 5.17-1 in the Recirculated Portions of the Draft EIR (on page 2-9) that summarizes a significant and unavoidable air quality impact identified in the City of Palo Alto's Comprehensive Plan Final EIR (i.e., Impact AIR-2). As such, this excerpt is not associated with any direct impacts of the proposed 2018 General Use Permit, but rather, is associated with implementation of the City of Palo Alto Comprehensive Plan 2030.

Impact 5.17-1 in the Recirculated Portions of the Draft EIR acknowledges that the Project's indirect impact associated with the construction of off-site housing may contribute to this significant and unavoidable air quality impact in the City of Palo Alto Comprehensive Plan Final EIR. With respect to the mitigation measures suggested by the comment to reduce the impact, since these indirect off-site impacts would not occur within the County jurisdiction, the County cannot require any construction air quality mitigation within Palo Alto or other jurisdictions; rather, this would be the responsibility of the jurisdiction(s) in which the impact would occur.

Please note, however, that the Draft EIR determined that all direct construction impacts associated with the proposed 2018 General Use Permit that would occur within the General Use Permit boundary would be less than significant with mitigation. Please refer to Draft EIR Impact 5.2-1, Impact 5.2-2, and Impact 5.2-3.

Comment Letter RI-Rosenblums

From: pol1@rosenblums.us
To: [Rader, David](#)
Subject: Stanford GUP
Date: Monday, July 9, 2018 12:05:23 PM

Dear Supervisors,

I have read the modified Stanford GUP and believe that Stanford needs to do significantly more to alleviate traffic congestion in Palo Alto before any new development plan is approved. It is clear from Stanford's analysis that having the university build more housing on campus will not reduce congestion at all. As a possible traffic mitigation, I urge you to add a significant contribution from Stanford to the GUP to enable putting the Caltrain tracks in a bored tunnel. In that way the east-west connectivity throughout the city would be significantly improved allowing vehicles to cross the buried right of way at more streets, alleviating pressure on the existing 7 vehicular crossings. It would also allow bike/pedestrian traffic to cross the right of way anywhere, thus promoting the use of bicycles and walking. The estimated cost of a tunnel is about \$3 billion. Stanford is the largest employer in Santa Clara County and should be expected to put up a significant part of this cost.

Dr. Stephen Rosenblum

Palo Alto

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6.2.3.30 Responses to Comments from Stephen Rosenblums

RI-Rosenblums-1 The comment regards existing traffic conditions in the City of Palo Alto. Please see Master Response 3: General Comments on EIR and Environmental Topics, and Master Response 6: Approach to 2018 Baseline Environmental Setting and Cumulative Scenarios.

RI-Rosenblums-2 The Recirculated Portions of Draft EIR does not identify a significant adverse effect to the environment that would be addressed by requiring Stanford to contribute money to expand Caltrain capacity, including grade separations. The Draft EIR identifies proposed mitigation strategies (Mitigation Measure 5.15-2) to address the transportation impacts of the proposed Project on pages 5.15-74 to 5.15-90.⁵ The intersection improvements are identified in Draft EIR Table 1 on pages 5.15-84 through 5.15-86. One intersection improvement was identified in proximity to a Caltrain at-grade crossing at Alma Street/ Charleston Road (Intersection #58): Contribute fair-share funding toward the addition of a designated northbound right-turn lane and installation of an overlap phase for the northbound and southbound right-turn movements.

Mitigation Measure 5.15-2(b) has been added 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. This expanded mitigation measure includes a fair-share funding contribution toward the addition of a designated northbound right-turn lane at Alma Street/ Charleston Road (Intersection #58). Please see Chapter 2 in this Response to Comments Document for the revised mitigation measure text.

⁵ Please note that in response to comments, and as a result of County initiated changes, Mitigation Measure 5.15-2 has been expanded as Mitigation Measure 5.15-2(a)-(b). Please see Chapter 2 in this Response to Comments Document for the full revisions made to this mitigation measure.

Comment Letter RI-Schor

From: [Edward Schor](#)
To: [Rader, David](#)
Subject: Comments on Stanford University 2018 General Use Permit
Date: Monday, June 25, 2018 9:05:47 PM

In general, I am opposed to the proposed project. I see no rationale for Stanford to expand its student body size beyond its current enrollment. Such expansion will only lead to the need to hire more support workers (housekeeping, food service, etc.), further building and infringement on the environment and on the quality of life in surrounding neighborhood. Local streets, including main roads, are becoming impassable at current population levels and will only worsen with expansion.

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I am strongly opposed to off-campus development of student housing, as the likely noise of over a thousand students and their disruption of the culture of the neighborhood is something to be avoided. Menlo Park and Palo Alto are in need of affordable housing for residents; the need for additional housing for students is dubious.

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I find both Alternatives A and B unacceptable.

4

Edward Schor



Virus-free. www.avg.com

6.2.3.31 Responses to Comments from Edward Schor

- RI-Schor-1 Comments opposing the proposed Project will be considered by the County Board of Supervisors when they consider whether to approve the Project. Comments concerning quality of life are outside of the scope of this EIR; please see Master Response 1: Non-CEQA Comments.
- RI-Schor-2 Due to lack of specificity in the comment, no specific response is possible; please see Master Response 3: General Comments on EIR and Environmental Topics.
- However, please see Draft EIR Section 5.15 Transportation and Traffic which addresses all Project and contribution to cumulative traffic impacts associated with the construction and operation of the proposed Project, and identifies mitigation that reduces significant impacts to the extent feasible. Please also see Master Response 13: Transportation and Traffic. Similarly, the Recirculated Portions of Draft EIR Sections 7.4.4 and 7.4.5 addressed traffic impacts from the additional housing alternatives.
- RI-Schor-3 The Draft EIR Section 5.11 Noise and Vibration addresses all Project and contribution to cumulative noise impacts associated with the construction and operation of the proposed Project, and identifies mitigation that reduces significant impacts to the extent feasible. Similarly, the Recirculated Portions of Draft EIR Sections 7.4.4 and 7.4.5 addressed noise impacts from the additional housing alternatives. As discussed in the EIR, the greatest noise impacts would be associated with temporary construction noise, operational stationary noise sources (e.g., HVAC equipment on new buildings), and increases in off-site noise from traffic.
- Impacts of the Project on affordable housing, and the need for affordable housing for residents of Menlo Park and Palo Alto, are socioeconomic issues not required to be analyzed in the Draft EIR.
- RI-Schor-4 Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Seki

From: [Dena Seki](#)
To: [Rader, David](#)
Subject: New EIR adding Stanford housing
Date: Sunday, June 24, 2018 9:23:44 AM

If this new housing is built on Stanford campus, the school age children will attend Palo Alto Unified School District "PAUSD" as all children living on Stanford campus do. Is it true that the residents of the new housing will not have to pay the same property taxes at the same levels of those living in Palo Alto? If that is true, how will PAUSD get paid for the additional children that are added to the school district?

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Thank you, Dena

6.2.3.32 Responses to Comments from Dena Seki

RI-Seki-1 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.

However, please see Draft EIR 5.13 Public Services which addresses all Project and contribution to cumulative impacts to public schools and determined those impacts to be less than significant. Similarly, the Recirculated Portions of Draft EIR Sections 7.4.4 and 7.4.5 addressed impacts to public schools from the additional housing alternatives.

Comment Letter RI-Singleton

From: [joe.singleton](#)
To: [Kumar, Kavitha](#); [Rader, David](#); [Supervisor Simitian](#)
Subject: gup objections
Date: Thursday, July 26, 2018 5:09:02 PM

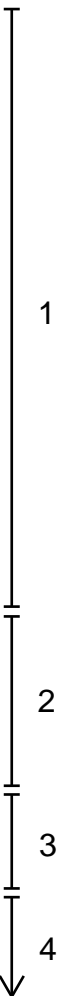
kavitha.kumar@pln.sccgov.org
david.rader@pln.sccgov.org
supervisor.simitian@bos.sccgov.org

OBJECTION TO STANFORD'S ANNUAL GUP REPORT
Specifically with Respect to Traffic Impacts in San Mateo County
In the Alpine/Sand Hill/Alameda/Santa Cruz Corridor
(<https://www.sccgov.org/sites/dpd/DocsForms/Documents/SU.2018.A.R17.pdf>)

Appendix D, Section III Conditions G & Appendix G

No New Net Commute Trips uses Flawed Methodology

- The people living in the Santa Cruz/Alameda/Alpine corridor in West Menlo Park totally disagree with the report that traffic counts went down. The methodology is flawed as is the logic to the approach. Stanford is essentially having their cake and eating it too and its neighboring residents are being harmed. Page D-15 outlines the bizarre method for computing “No New Net Commute Trips” which, allegedly only counts vehicles whose destination is the *core academic campus*, eliminating “pass through” traffic and those vehicles going to the Hospital. However, this is belied by the statements on Page D-16. Here, there is an example of a credit that would be applied for someone (such as a patient) using a bus from the Cal station *to the hospital*. However, hospital traffic is completely eliminated from the cordon counts of traffic! This makes no logical sense.
- There is no “rush hour” for traffic in this corridor. It begins as early as 4am and continues until 9pm. Limiting the traffic count to only between 7-9 a.m does not reflect reality. Often the busiest line ups at the intersection of Santa Cruz and Alameda are outside those “rush hour” times.
- Every day traffic is bumper to bumper going to and from campus and impacting Alpine, Sand Hill, Alameda, Junipero Serra and Santa Cruz Ave in West Menlo Park.
- The counts don’t include the construction trucks which are ever-present and nonstop with the ongoing development at Stanford. Whatever time of day construction trucks go to and



Comment Letter RI-Singleton

from campus, they are a nuisance and at least on Alpine they are a serious safety hazard because it is a two lane wind road with blind corners. These trucks should NOT be using Alpine at all as it is listed as a **County truck route** and **not recommended** for construction vehicles, but it is used very frequently.

- The Central Campus includes those areas designated West Campus, Lathrop, and Foothills. This would include e.g. the Golf Course, yet traffic to this destination (which includes a commercial restaurant and catering operation) is not included in the computations.
- **The No New Net Trip Calculation Eliminates Traffic Caused by Sports & Other Public Events.** There are frequent sports events for Football, Basket Ball, Golf, Tennis, Indian Pow Wows, Concerts, Lectures, etc. that draw many thousands of people and vehicles in non-compute times that are disruptive to neighborhoods in W. Menlo Park. Stanford's own brochure on the 2018 GUP states that nearly a half million tourists come to the campus every year. These trips are not counted.

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cont.

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Alternatives A and B Don't Factor in Impact to County of San Mateo and West Menlo Park

- The GUP and its Alternatives A & B do not account for the ongoing detrimental impact that Stanford has on San Mateo County and West Menlo Park in particular. Quite simply, Stanford is not being a good neighbor.
- Santa Clara County Planning Dept. has taken a very short sighted and uninformed view in recommending approval of this report with respect to San Mateo County. Santa Clara is required to consider the impact on ***all surrounding communities***, and San Mateo County has borne the brunt of much of the construction, traffic and other events under the 2000 GUP. Santa Clara needs to take a more responsible position.

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6.2.3.33 Responses to Comments from Joe Singleton

- RI-Singleton-1 Please see Response to Comment RI-Glennan-1.
- RI-Singleton-2 Please see Response to Comment RI-Glennan-2.
- RI-Singleton-3 Please see Response to Comment RI-Glennan-3.
- RI-Singleton-4 Please see Response to Comment RI-Glennan-4.
- RI-Singleton-5 Please see Response to Comment RI-Glennan-5.
- RI-Singleton-6 Please see Response to Comment RI-Glennan-6.
- RI-Singleton-7 Please see Response to Comment RI-Glennan-7.
- RI-Singleton-8 Please see Response to Comment RI-Glennan-8.

Comment Letter RI-Smedberg

From: [Virginia Smedberg](#)
To: [Rader, David](#)
Subject: Stanford's expansion
Date: Thursday, July 26, 2018 12:56:59 AM

Dear Mr Rader:

I live in Palo Alto. We already have a housing crisis, with too many huge new "HOUSES" being built and sold at exorbitant prices, often to overseas people who don't LIVE there but are just looking for financial investments; and with too many office spaces being created without commensurate housing for those office workers. So no one can afford to live here any more except a few of us who inherited HOMES. I intentionally differentiate those 2 words. Too many of the people who work in Palo Alto have to commute from more affordable communities - for example our teachers! and many other professions. If Stanford wants to add to the people on campus, I think they should be required to provide housing for those people - ALL OF THEM - so they can live near where they work/attend school, WALK OR BIKE there, and not add to the traffic chaos. I carpool to my job with Opera San Jose, evening 7:30 rehearsals, and we have had to leave Palo Alto 5 minutes earlier each year because the traffic going south to get home is so thick.

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It is also imperative that we consider the actual carrying capacity of our environment. We have limited water (I do want the Tuolumne to be able to support salmon, irrigation, and our water supply, and the decreasing snow pack, because of the increasing overall temperature, requires that we re-think some of our wanton use of that water). We need some "green belts" to ensure there are enough plants, trees especially, to do the carbon/oxygen conversion that Ma Nature designed the ecosystem for (along with sustaining all the other species besides humans - we do NOT own this earth, we borrow it from our children, and in the long run we rent it from whatever supreme creator you might believe in, and some day we'll have to give it back in a decent condition!); so we can't pave over or build buildings on all of our land. And there is "quality of life" - interaction with Ma Nature always has a healing effect on us humans. Not sitting in cars on concrete, or living only within the confines of a building.

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I appreciate your taking the time to consider my ideas.

Sincerely,
Virginia Smedberg

[REDACTED]
[REDACTED]

6.2.3.34 Responses to Comments from Virginia Smedberg

- RI-Smedberg-1 Impacts of the Project on affordable housing is a socioeconomic issue that falls outside the scope of CEQA. Please see Master Response 1: Non-CEQA Comments, and Master Response 10: Affordable Housing.

Please note that the Recirculated Portion of Draft EIR analyzes Additional Housing Alternative A. In addition to the proposed on-campus housing that would be provided under the proposed 2018 General Use Permit (3,150 units/beds), this alternative would also provide additional 2,549 units/beds of on-campus housing, equivalent to the net increase in off-campus housing demand that would occur under the proposed Project. Thus, Additional Housing Alternative A includes the provision of a total of 5,699 new on-campus housing units/beds.

- RI-Smedberg-2 Comments inquiring about general carrying capacity, effect on quality of life, and need for green belts do not relate to the adequacy of the environmental impact analysis of the proposed Project or additional housing alternatives. However, the EIR addresses all Project and cumulative environmental impacts, as appropriate. Please see Master Response 2: Non-Project Planning Process, Topic 1: Sustainable Development Study as it relates to future development potential for the University beyond the 2018 General Use Permit.

Please also see Draft EIR Section 5.3 Biological Resources, Section 5.9 Hydrology and Water Quality, and Section 5.16 Utilities and Service Systems which addresses all Project and cumulative impacts on biological resources, hydrology and water supply associated with the proposed Project. See also Sections 7.4.4 and 7.4.5 of the Recirculated Portions of Draft EIR which address effects on biological resources, hydrology and water supply associated with Additional Housing Alternative A and Additional Housing Alternative B.

Comment Letter RI-Sun

From: [Diane Sun](#)
To: [Rader, David](#)
Subject: Regarding Stanfod property tax exempt
Date: Tuesday, July 10, 2018 9:26:58 PM

Dear David,

Stanford residences use Palo Alto school resource, but not contributing to the school fund by paying property tax, while Stanford collects the rent from students and residences. This is extremely unfair to other Palo Alto residence. County should collect property tax from Stanford to support the local schools equally.

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Thank you!

--

Warm Regards,

Diane Sun, A Palo Alto Residence

Cell: [REDACTED]
[REDACTED]

6.2.3.35 Responses to Comments from Diane Sun

RI-Sun-1 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.



Stanford University 2018 General Use Permit
Form to Comment on Recirculated Portions of Draft EIR

COMMENTS

(Please print clearly and legibly)

Please hand in during the meeting or mail (address on back) or email by **July 26, 2018**.

Name:

Phillip + Margerite Vincent

Organization (if any):

Address (optional):

City, State, Zip:

Portola Valley, CA 94028

E-mail:

[REDACTED]

This comment form is being furnished to obtain comments and questions from the public on the **Recirculated Portions of the Stanford University 2018 General Use Permit Draft EIR**.

All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

Comments (Please print clearly and legibly)

We are both Stanford graduate degree
graduates. We support greatly increase
student body. Stanford was a
wonderful situation compared with other
comparable universities - a lot of luck
we had to have near how
University today.

1

(More space on reverse side)

6.2.3.36 Responses to Comments from Phillip and Margarita Vincent

RI-Vincent-1 Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Warner

From: [Karlette Warner](#)
To: [Rader, David](#)
Subject: Comments on the Draft Environmental Impact Report for the Stanford University 2018 General Use Permit
Date: Saturday, June 30, 2018 5:05:22 PM

To: David Rader, Santa Clara County Planning Office

From: Karlette Warner, 40-year resident of Palo Alto [REDACTED]

Dear Sir:

I have not read the entire EIR, but I would like to express my concerns regarding section **5.15**

Transportation and Traffic in Attachment A of the notice from Kirk Girard, dated 6/6/18, and recently mailed to area residents:

Each item, 5.15.2 through 5.15.10, indicates an issue of "Significant and unavoidable impact" regarding traffic increase caused by Stanford's proposal. Traffic in our area (Palo Alto, Stanford, Menlo Park) is already at a near breaking point. Adding to it, with "unavoidable impact" is, in my opinion, irresponsible and unacceptable.

To use a well-worn phrase, this aspect of the project needs to go "back to the drawing board!"

Thank you.

Karlette Warner

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6.2.3.37 Responses to Comments from Karlette Warner

RI-Warner-1 The comment references the significant and unavoidable impacts in Draft EIR Section 5.15 Transportation and Traffic, however, does not raise any specific issues addressing the adequacy of the Draft EIR or Recirculated Portions of Draft EIR. Please see Master Response 1: Non-CEQA Comments.

Comment Letter RI-Yost

From: [REDACTED]
To: [Rader, David](#)
Subject: Stanford development plan
Date: Wednesday, July 25, 2018 9:13:04 PM

Dear Mr. Rader,

I strongly urge you to not make our housing crisis worse with the latest development plan. I would like to know where you plan to house all the new people (8,500 per day) that will be drawn by the new development. We cannot afford development without appropriate housing to go along with it!

Thanks you, Greg Yost.

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6.2.3.38 Responses to Comments from Greg Yost

RI-Yost-1 As addressed in the Draft EIR Section 5.12 Population and Housing, Impact 5.12-1, the increase in the daily Stanford population (including undergraduate students, graduate students, postdoctoral students, faculty, staff, and other workers) under the Project would be 8,583. Impact 5.12-1 also describes that the total increase in Stanford population residing on the campus (including undergraduate students, graduate students, postdoctoral students, faculty, and staff, and family members) would be 6,326. The amount (3,150 units/beds) and general distribution of new on-campus housing is described in Draft EIR Chapter 3, Project Description. The Draft EIR estimates the Project would create an off-site housing demand for 2,425 housing units, and describes the likely distribution by city for that housing demand.

Please also see Recirculated Portions of Draft EIR includes Additional Housing Alternative A and B. Under Additional Housing Alternative A, it is assumed that the additional housing demand created by the Project would be met by constructing additional on-campus housing (an additional 2,549 units/beds of on-campus housing, for a total of 5,699 new on-campus housing units/beds). Additional Housing Alternative B assumes that half of the additional housing demand created by the Project would be met by constructing additional on-campus housing.

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