

From: Janet Davis  
To: Rader, David; Supervisor Similan; Don Horsley; Warren Slovum; Dave Pine; Carole Groom; David Canessa; Michael Calagay; City Council; Virgin a Cheng Kiraly; Diana Shu  
Cc: Peter Drakemier; Cheryl Phan; Molly Clemens; Ron Snow; Gwen Leonard; Diana Gerha; Susie Cohen; Jan Wolosin; Robert & Esther Hicks via Gmail; Rebecca A Iamirano; Christina Hellsley; Gunter Steffan  
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](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>

**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

Sent from my iPhone

**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?

Thank you, Dena



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

**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.

**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.

**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."

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

**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.

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.

I find both Alternatives A and B unacceptable.

Edward Schor



Virus-free. [www.avg.com](http://www.avg.com)



**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: [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)**

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)



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:

Phillip + Marguerite Vincent

Organization (if any):

Address (optional):

City, State, Zip:

Portola Valley, CA 94028

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)**

We are both Stanford graduate degree  
graduates. We support greatly however  
~~Stanford~~ mobility. Stanford has a  
wonderful situation compared with other  
comparable universities. A lot of luck  
we need to have near your  
University housing.

(More space on reverse side)

**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

**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

**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



**From:** [pol1@rosenblums.us](mailto: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

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 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**

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

---


Dear David,

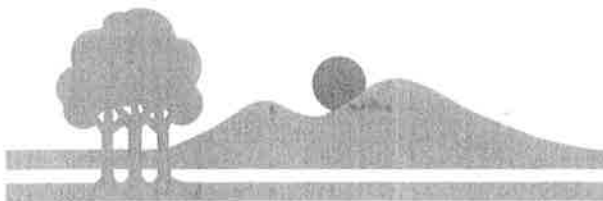
Stanford residences use Palo Alto school resource, but not contributing to the school fund by paying property tax, while Stanford collects the rent from students and residences. This is extremely unfair to other Palo Alto residence. County should collect property tax from Stanford to support the local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

Thank you!

--

Warm Regards,

Diane Sun, A Palo Alto Residence  
Cell: 



## CITY OF MOUNTAIN VIEW

### OFFICE OF THE CITY MANAGER

500 Castro Street • Post Office Box 7540 • Mountain View • California • 94039-7540  
650-903-6301 • Fax 650-962-0384

July 17, 2018

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

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

Dear Mr. Rader:

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

#### Colocating Housing Near Jobs

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

#### Fair-Share Funding

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

Mr. David Rader  
July 17, 2018  
Page 2

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

Intersection No. 89/ Close Castro Street

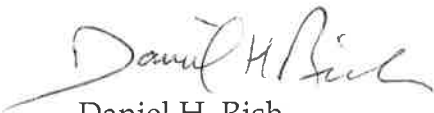
Pages 2-188, 2-228, 2-391, and 2-431 of the DEIR still indicate that "...if Castro Street is independently closed by the City of Mountain View, Stanford would not need to contribute funding to any improvements at this intersection." We would request that Stanford University make a fair-share funding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

Marguerite Shuttles

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

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

Sincerely,



Daniel H. Rich  
City Manager

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

Enclosure

cc: City Council

SCE – Cervantes, PP, SP – Roche



CITY OF MOUNTAIN VIEW

COMMUNITY DEVELOPMENT DEPARTMENT • PLANNING DIVISION

500 Castro Street • Post Office Box 7540 • Mountain View • California • 94039-7540

650-903-6306 • Fax 650-962-8501

December 12, 2017

David Rader

Santa Clara County Planning Office, County Government Center

701 W. Hedding Street, 7<sup>th</sup> Floor, East Wing

San Jose, CA 95110

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

Dear Mr. Rader:

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

**1. Transportation & Traffic**

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

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

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

**2. No Net New Commute Trips**

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

David Rader  
December 12, 2017  
Page 2

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

### **3. Affordable Housing Funding Availability**

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

### **4. Historic and Cultural Resources**

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

### **5. Rideshare Technology**

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

### **6. GUP Outreach**

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Tsuda', with a stylized, flowing script.

Randal R. Tsuda, AICP  
Community Development Director

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

**From:** [Isaac@ITOPcorp.com](mailto:Isaac@ITOPcorp.com)  
**To:** [Rader, David](#)  
**Cc:** [joseph.simitian@bos.sccgov.org](mailto:joseph.simitian@bos.sccgov.org); Prior, Christine; Hellman-Tincher, Micaela; [greg.scharff@cityofpaloalto.org](mailto:greg.scharff@cityofpaloalto.org); [gregscharff@aol.com](mailto:gregscharff@aol.com); Tom DuBois; [tom.dubois@cityofpaloalto.org](mailto:tom.dubois@cityofpaloalto.org); [eric.filseth@cityofpaloalto.org](mailto:eric.filseth@cityofpaloalto.org); [Adrian.Fine@cityofpaloalto.org](mailto:Adrian.Fine@cityofpaloalto.org); [cory.wolbach@cityofpaloalto.org](mailto:cory.wolbach@cityofpaloalto.org); [karen.holman@cityofpaloalto.org](mailto:karen.holman@cityofpaloalto.org); [liz.kniss@cityofpaloalto.org](mailto:liz.kniss@cityofpaloalto.org); [greg.tanaka@cityofpaloalto.org](mailto:greg.tanaka@cityofpaloalto.org); Greg Tanaka; [Lydia.Kou@cityofpaloalto.org](mailto: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





**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](mailto: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.

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.**

**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

(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.

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.

**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.**

**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

**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.**

























# TOWN of PORTOLA VALLEY

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

July 20, 2018

David Rader

Santa Clara County Planning Office, County Government Center  
70 W. Hedding Street, 7<sup>th</sup> Floor, East Wing  
San Jose, CA 95110

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

Mr. Rader,

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

## **Background**

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

## **Comments**

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

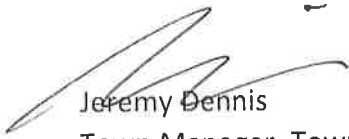
The Town is supportive of full consideration of the impacts any project may have on its neighbors, and the addition of the two new alternatives is appropriate as the full housing demand of the project as described was not addressed in the first draft GUP. The Bay Area in general, and Santa Clara and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

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

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

Thank you for your consideration of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeremy Dennis', is written over the printed name.

Jeremy Dennis  
Town Manager, Town of Portola Valley

cc: Mayor and Town Council

Attachment: December 14, 2017 GUP comment letter

# TOWN of PORTOLA VALLEY

Town Hall: 765 Portola Road, Portola Valley, CA 94026 Tel: (650) 851-1700 Fax: (650) 851-4677



December 14, 2017

David Rader  
Santa Clara County Planning Office, County Government Center  
70 W. Hedding Street, 7th Floor, East Wing,  
San Jose, CA 95110  
david.rader@pln.sccgov.org.  
Fax: (408) 288-9198

Re: Comments on DEIR for Stanford University's 2018 GUP

Dear Mr. Rader:

Thank you for the opportunity to respond to the Draft Environmental Impact Report for Stanford University's 2018 General Use Permit (DEIR). In light of the County of Santa Clara's recent extension of the comment period, the full Town Council has had an opportunity to discuss the DEIR and this letter is being sent on behalf of the Town of Portola Valley. The Town's comments focus on the housing issues discussed in the DEIR.

## *Background*

We understand that Stanford University seeks to develop 2,275,000 SF net new academic and academic support space (and build out the remaining square footage in the 2000 GUP)<sup>1</sup> and add 3,150 net new housing units/beds of which up to 550 units would be available for faculty, staff, postdoctoral scholars and medical residents. The application for development is wholly within Academic Growth Boundary (AGB), central campus, located in Santa Clara County. By 2035 full buildout the project is expected to increase the regional population by 9,610 people-this is two times the total population of the Town of Portola Valley.

## *Carryover of 2000 GUP Housing Strategies*

As a preliminary matter, we support the Housing Linkage policy codified as Condition F.8 of the 2000 General Use Permit requiring that Stanford's development of academic and academic support space be linked to the development of its housing units. We think this linkage program has worked well to ensure housing construction keeps pace with academic development and we are pleased to see this program carried forward in the 2017 GUP. We encourage the County to look closely at the existing triggers and update them to reflect the current housing crisis.

Likewise, we support the affordable housing program codified as Condition F.6 of the 2000 General Use Permit requiring that for each 11,763 square feet of academic development constructed, Stanford shall either: 1) provide one affordable housing unit on the Stanford campus, or 2) make an appropriate cash

---

<sup>1</sup>We assume this 2000 GUP build out will be subject to Conditions F.6 and F.8 regarding housing linkage and affordable housing fund requirements.

payment in-lieu of providing the housing unit. We encourage the County to look closely at the in lieu fee and set it at an initial rate that reflects the current market conditions. Also, as discussed in more detail below, while we acknowledge that some of the funding should be prioritized towards transit proximate development, we also encourage the County to retain the six-mile radius policy in order to fund more projects.

### ***Comments on Population and Housing Section***

1. *Jobs/housing imbalance:* While the DEIR recognizes the current job/housing imbalance, its current prominence in Plan Bay Area 2040 and the associated environmental impacts, the DEIR falls short of analyzing the project's impact on this imbalance. Over twenty years ago the Santa Clara County General Plan recognized that employment and economic growth in the County was greatly outpacing the housing supply, and the housing that was being constructed at greater distances from major employment centers in the County.

The DEIR also recognizes that the "principal effects of this imbalance are known to include: increased travel and commute distances; increased traffic congestion; increased automobile dependency; increased housing affordability problems, especially in "job-rich" cities; increased automobile emissions, including greenhouse gas emissions, affecting air quality and contributing to global climate change; increased noise; and overburdened urban services and facilities."

Since 1980 all other Bay Area counties have added more jobs per added housing unit than was their situation in 1980, thus exacerbating this imbalance. This is due to not just robust job growth in these Counties but to a dramatic slowdown in housing production there relative to earlier decades, particularly in San Mateo county, Santa Clara county, and other inner East Bay communities. The existing housing stock is also increasingly housing higher wage earners as the regional economy shifts toward higher wage jobs and actual housing production lags growth in demand.

The Stanford University Medical Center 2012 EIR looked at this imbalance and we think it would be productive to have a similar analysis here.

#### *2. Population Projections:*

- A. Stanford's off-campus housing demand projection throughout the region is a critical component of the population and housing analysis. Given the role of Stanford as a nationally recognized research institution with plans to increase the faculty during the project period, the accuracy of Stanford's projections of graduate student and postdoctoral population cohorts that will affect the demand for off campus housing should be further analyzed and discussed.
- B. The population projections in Tables 5.12.7 and 5.12.8 do not appear to include service workers associated with the population increase. As population increases, the demand for services also increases. For instance, it is likely that faculty members moving into single family homes will hire gardeners, housekeepers, nannies and other service workers. As the sharing economy grows, it is also likely that car drivers and delivery people will also increase. This increase in service workers, particularly low income workers, should also be included in the projections.
- C. Please include a total population chart for off-site affiliated housing. The DEIR includes a table showing increased population related to graduate students and faculty/staff (i.e. spouses, children and other family members), but the off site housing section does not. Accordingly, the offsite housing population numbers appear to be under-estimated.

3. *Displacement of Existing Residents:* The DEIR states "Existing housing on the campus may be demolished over the course of implementation of the 2018 General Use Permit; however, any demolished housing units would be added to the inventory of new housing units authorized for construction. Therefore, the Project would not displace substantial numbers of existing housing." (P.5.12.14.) Please clarify whether Stanford intends to demolish any existing on or off site housing units and if so clarify where the occupants will be temporarily housed during construction. As we have seen with the devastating fires in Sonoma, Napa and Mendocino Counties, temporary housing demand can have a significant impact on a local community's existing housing stock, especially its affordable rental stock.

4. *Analysis of Faculty Housing Demand:* The DEIR states that there will be a net reduction of 102 faculty households. (P. 5.12.17.) With the DEIR projecting 789 net new faculty members and the project proposing to build 550 faculty/staff/medical student units, please explain how there is a net reduction of needed units.

5. *Methodology for Assuming Off Site Housing Demand Is Met*

A. The DEIR states the estimated distribution of off site housing demand is based on data from Stanford's 2016 Commute Survey (p. 5.12.17). Given the current housing crisis in the Bay area, it is unreasonable to assume that all population sectors, particularly low income wage earners, will continue to live in nearby communities where housing prices have shot up and vacancy rates remain low.

B. The DEIR concludes there is no impact on population and housing because the housing increases within each of these jurisdictions would represent a small fraction of the household growth projected for each jurisdiction by ABAG for the 2015-2040 timeframe. (P.5.12.18). There are two problems with this conclusion. First, the ABAG population projections and the RHNA housing allocations based on those populations, are only directory. ABAG does not mandate the construction of housing and thus the ABAG projections are not an accurate proxy for whether the housing demand will in fact be accommodated. Second, the current housing crisis has made it clear that jobs production has well out paced housing production. The overall area is not only experiencing significant housing deficits right now, but such deficits are projected to continue well into the future. Given this current housing situation, the DEIR should conduct a more thorough analysis to determine whether off-site housing allocated to a particular jurisdiction will in fact be built and be available to Stanford's population demand. Data about existing off-site leases or Stanford owned land that could be developed into housing would be useful to this analysis.

6. *Impact on Town of Portola Valley:* The draft EIR indicates that the 2018 GUP is anticipated to result in only one more unit in Portola Valley (indirect growth) (P. 5.12.19). This appears to significantly underestimate housing demand in Portola Valley which is directly adjacent to Stanford.

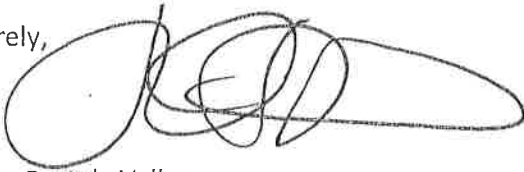
### *Additional Recommendations*

1. To more fully address the project's housing impacts, we recommend that the County review the housing linkage triggers to ensure that the amount of on site housing is maximized and constructed prior to academic build out. Likewise, we request the County to examine the amount of the affordable housing linkage to ensure that it adequately accounts for the project's affordable housing demand and that the in lieu fee reflects the current and future housing market.
2. We also request the County to consider allocating a portion of its affordable housing fund to jurisdictions that do not meet the mile transit proximate criteria. In addition, we encourage expanded use of these funds to support construction of accessory dwelling units. Stanford students are likely renters of such ADU's. In particular, the Town Council of Portola Valley has recently been discussing strategies for addressing the community's housing challenges. While the cost of land and estate zoning poses challenges, we believe an expanded accessory dwelling unit program is viable as is Town-constructed workforce housing. We look forward to partnering with the County/Stanford on these and other housing programs. Portola Valley's close proximity to the Stanford project would also assist in reducing commute traffic and might even reduce the impacts to the 280 Freeway/Alpine LOS F intersection identified in the DEIR. To this end, we encourage the County and Stanford to examine extending the Marguerite shuttle and/or other commute bus into Portola Valley during commute hours and partnering with Portola Valley on Zipcar and commuter bicycle programs.
3. We encourage Stanford to facilitate Santa Clara County working with San Mateo County in developing and improving current bicycle and pedestrian pathways throughout Stanford lands and adjacent communities. We strongly support the existing pathways Stanford has created throughout campus and urge Stanford to continue its efforts to encourage students, faculty and staff to convert more off-campus vehicle trips to bicycle or pedestrian trips.
4. Finally, as a community which values its open space and rural character, we encourage the County to require a permanent conservation easement over the foothills in return for the development in the flatlands. Clustering development and offsetting the intensity of development with permanent protection of the adjacent hills is a planning tool used by most nearby local agencies and the County itself. Stanford's growth at this point is basically unrestricted. As Supervisor Simitian has pointed out, Stanford's ultimate buildout must be known so that every 15 years or so, Stanford does not request another 3 million square feet of development. The 2000 GUP required preparation of a holding capacity analysis intended to set the maximum buildout limits for the Stanford lands, with particular attention to the foothills. This analysis was not completed. It should not only be completed, but also analyzed in the EIR. Furthermore, the holding capacity should be analyzed for each campus area, so that there is assurance that the foothills will remain protected. (Please also see comment letter from Sandy Sloan dated November 21, 2017 which is attached and incorporated.)



Thank you for your consideration of these concerns. We would appreciate any opportunity to discuss these issues with you and would appreciate a response.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'P' followed by several loops and a long horizontal stroke.

Mayor, Portola Valley

Enclosure

**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   
**To:** Kavitha Kumar <[kavitha.kumar@pln.sccgov.org](mailto:kavitha.kumar@pln.sccgov.org)>; David Rader  
<[david.rader@pln.sccgov.org](mailto:david.rader@pln.sccgov.org)>; Joe Simitian <[supervisor.simitian@bos.sccgov.org](mailto: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.

**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.

**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.

**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.

**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.

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.

**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.

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.

**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.

**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.

**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.

**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.

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.

**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.



**goldfarb  
lipman  
attorneys**

1300 Clay Street, Eleventh Floor  
Oakland, California 94612  
510 836-6336

M David Kroot

Lynn Hutchins

Karen M. Tiedemann

Thomas H. Webber

Dianne Jackson McLean

Michelle D. Brewer

Jennifer K. Bell

Robert C. Mills

Isabel L. Brown

James T. Diamond, Jr.

Margaret F. Jung

Heather J. Gould

William F. DiCamillo

Amy DeVaudreuil

Barbara E. Kautz

Erica Williams Orcharton

Luis A. Rodriguez

Rafael Yaquían

Celia W. Lee

Dolores Bastian Dalton

Joshua J. Mason

Eric S. Phillips

Elizabeth R. Klueck

Jeffrey A. Streiffer

Daniel S. Maroon

Justin D. Bigelow

Nahal Hamidi Adler

Aileen T. Nguyen

San Francisco

415 788-6336

Los Angeles

213 627-6336

San Diego

619 239-6336

Goldfarb & Lipman LLP

July 23, 2018

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

via electronic mail

Re: PAUSD Comments on Recirculated Portions of Draft EIR (SCH# 2017012022)  
for Stanford University 2018 General Use Permit

Dear Mr. Rader:

Our firm represents the Palo Alto Unified School District (PAUSD) in connection with the Environmental Impact Report (EIR) for Stanford University's 2018 General Use Permit application.

As stated in the February 1, 2018 letter from PAUSD Interim Superintendent of Schools Karen Hendricks regarding the Draft EIR, the entirety of which is incorporated by reference as though fully set forth in this letter, PAUSD is one of the premier school districts in the United States, and it values both its ongoing partnership with Stanford University and also its role in serving Palo Alto, the Stanford University Campus, and portions of Los Altos hills and Portola Valley by providing high-quality K-12 education for the community's children.

To that end, PAUSD appreciates that the County has provided opportunities to comment on the original Draft EIR for Stanford's project and the recirculated portions of the Draft EIR, which were revised in response to public comments and concerns regarding the project and the original Draft EIR (Recirculated Draft EIR).

Unfortunately, the revisions discussed in the Recirculated Draft EIR do not correctly identify the scope of the project's potential impacts, properly mitigate the project's impacts, or fully inform the public and public agencies like PAUSD about the project's potential environmental effects. As more fully explained below, the Draft EIR, as revised and partially recirculated, remains legally inadequate. Accordingly, PAUSD requests that the County revise the Draft EIR to identify and mitigate all of the project's environmental impacts and that the County recirculate the entire Draft EIR so that the public has the opportunity to understand and meaningfully comment on the project's environmental effects.

**I. New Impact 5-17 obfuscates the Project's scale and impacts.**

When "significant new information" is added to an EIR after the draft document is circulated, the California Environmental Quality Act (CEQA) requires the lead agency to recirculate the Draft EIR. (CEQA Guidelines § 15088.5(a).) "Significant new information" requiring recirculation includes the identification of new significant environmental impacts or when the draft EIR is "so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded." (*Id.* at § 15088.5(a)(1)-(4).) When revisions only affect one portion of an EIR, the lead agency is only required to recirculate the portions of the draft that are affected by the revisions. (*Id.* at 15088.5(c).)

One of the reasons the County determined to recirculate portions of the Draft EIR is because it identified a new, previously undisclosed significant impact. Starting on page 2-7, the recirculated Draft EIR describes a new Environmental Impact related to the "Environmental Consequences of Stanford Providing Off-Campus Housing under the Proposed Project." Impact 5.17-1, which is identified as significant and unavoidable, simply concludes that "the construction and/or operation of off-site housing would result in off-site environmental impacts." (Recirculated Draft EIR, p. 2-7.)

The Recirculated Draft EIR says that Stanford proposes to develop some unspecified amount of affordable housing within one-half mile of "any major transit stop . . . in the Bay Area," concluding that the impacts associated with this development would most directly and "disproportionally" affect Palo Alto, Menlo Park, and Mountain View. (*Id.*) Despite acknowledging this fact, the Recirculated Draft EIR makes no effort to quantify the effect this planned housing would have on any of the three identified communities. In the place of analysis, the Recirculated Draft EIR recites policies and impacts from the three cities' recent general plan updates. (*Id.* pp. 2-8 to 2-12.)

This approach precludes any meaningful form of public review or comment on the scope of the impacts, and is "so fundamentally and basically inadequate and conclusory in nature" that the Recirculated Draft EIR must be revised and recirculated in its entirety. (CEQA Guidelines § 15088.5(a)(4).) Identifying that Stanford's project would result in "environmental impacts" is not a substitute for disclosing and analyzing those impacts themselves. The Recirculated Draft EIR leaves readers to guess how much housing is actually proposed under the project, where such housing would be developed, and what effect such housing would have on the sixteen environmental impact areas discussed in the Draft EIR.

In essence, Impact 5.17-1 modifies the project description, because it changes the nature, scope, and scale of the project; however, it does so without providing any detail as to what are those precise changes. This approach violates CEQA's requirement that every EIR include a reasonably definite project description. "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*Washoe Meadows Community v. Department of Parks and Recreation* (2017) 17

Cal.App.5th 277, 287; citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193.) Without an adequate project description and corresponding analysis of the specific environmental impacts of a project, the EIR fails to include relevant information and "precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process." (*Washoe Meadows Community* 17 Cal.App.5th at 290.)

Therefore, to comply with CEQA, the County must revise the Draft EIR so that it discloses more details regarding Stanford's plan for off-campus housing in the project description. Then those details must be used as the basis for updated environmental analysis throughout the EIR, and the full document should be recirculated for public review.

## **II. Mitigation Measure 5.17-1 is vague and unenforceable.**

The Recirculated Draft EIR adds a new mitigation measure, Mitigation Measure 5.17-1, in an attempt to address Impact 5.17-1. (Recirculated Draft EIR, p. 2-12.)

Even if Impact 5.17-1 were a legitimate category of impact to discuss, the mitigation offered is so vague and indefinite that it amounts to improperly deferred mitigation. Any mitigation measures included in an EIR must be "fully enforceable through permit conditions, agreements, or other measures" to reduce the significance of an impact. (*Federation of Hillside & Canyon Associations v. City of Los Angeles* (2000) 83 Cal. App. 4th 1252, 1261.) Mitigation Measure 5-17.1 does not include any of these mechanisms to ensure it is enforceable. Instead, it says other local governments "can and should" mitigate the impacts caused by the project's off-campus housing development. This amounts to an improper deferral of mitigation, and an abdication of the responsibility to identify and incorporate feasible mitigation that would reduce a projects impacts in an EIR.

Mitigation Measure 5.17-1 should be replaced with some definite action or actions that the County or Stanford can take that are enforceable and would reduce the severity of the project's impacts related to off-campus housing development, and the EIR should be recirculated.

## **III. The two new alternatives distract from the public's ability to comment on the Project and Stanford's development plans.**

In addition to discussing Impact 5.17-1, the Recirculated Draft EIR introduces two new alternatives: an increased on-campus housing option and an increased off-campus housing option. As discussed above, the project itself has not been revised to specify what level of off-campus development is associated with the project, so it is unclear how to evaluate how these two alternatives compare with the project itself.

By providing hundreds of pages of new information on alternatives, but not fully describing the project itself, the Recirculated Draft EIR improperly "presents the public with a moving target and requires a commenter to offer input on a wide range of alternatives that may not be in any way germane to the project ultimately approved." (*Washoe Meadows Community* 17 Cal.App.5th at 288.)

When the EIR is revised and recirculated as requested above, it should be clearer about what development scenarios are feasible and acceptable to Stanford so that it is not necessary to review different sets of impacts, requiring different mitigation measures, for projects with vastly different approaches and development footprints that may never come to fruition.

#### **IV. The EIR understates current and future school enrollment impacts.**

The Recirculated Draft EIR makes the same mistake the Draft EIR made by relying on outdated student generation rates to project future PAUSD school enrollment demand created by Stanford's development. (Recirculated Draft EIR p. 2-161.) As discussed in PAUSD's February 1, 2018 letter regarding the Draft EIR, current student generation rates range from 0.66 to 0.98 students per household, depending on the type of housing being developed.

Because the housing proposed as part of the project and the alternatives in the Recirculated Draft EIR focus on graduate student, faculty, and staff housing (groups that tend to have school age children), it is appropriate to use the 0.98 student generation rate, which would provide a conservative estimate of the extent of the environmental impacts. At a minimum, a student generation rate of 0.66 should be used, although this could cause environmental impacts to be undisclosed or understated. The Recirculated Draft EIR uses an even lower figure: a student generation rate of 0.5. (Recirculated Draft EIR p. 2-161.) This lower figure understates future enrollment demand by almost 50 percent, and every attendant impact – from the need to new facilities to the traffic associated with taking twice as many students to school – is also correspondingly understated.

Accordingly, the EIR should be revised to disclose the project's and the alternatives' actual impact on PAUSD facilities and related impacts using more recent and accurate enrollment projection data.

#### **V. The EIR does not attempt to fully mitigate impacts related to school operations.**

Throughout the Draft EIR and the Recirculated Draft EIR, analysis of school impacts are dismissed as being less than significant because Stanford would commit to paying the school impact fees required by Government Code section 65996. (*See, e.g.*, Recirculated Draft EIR pp. 2-160 to 2-162 and 2-363 to 2-366.) It is correct that the Government Code caps development fees, and that the collection of such fees is



adequate mitigation for CEQA purposes regarding impacts on school facilities and the need to develop new school facilities. However, the EIR must still examine environmental impacts that affect school operations but are not directly related to the need for new school facilities. (*See Chawanakee Unified School Dist. v. County of Madera* (2011) 196 Cal.App.4th 1016, 1029.)

For example, the two schools that would serve development on Stanford campus, Escondido Elementary and Nixon Elementary, have capacities of 595 and 460 students, respectively. For the 2017-2018 PAUSD academic year, Escondido Elementary enrolled 537 students, and Nixon Elementary enrolled 441 students. Potentially, new students could be accommodated at Barron Park Elementary, which has capacity for 380 students and a current enrollment of 255 students. However, sending students from the Stanford campus to Barron Park Elementary, which is further from campus and not a "neighborhood school," would directly contravene PAUSD Board Policy 7110 (BP 7110).

BP 7110 calls for PAUSD to "provide sufficient capacity so new student residents and siblings have predictable and routine access to neighborhood schools." In addition, BP 7110 says that PAUSD shall "plan and preserve educationally effective school sizes throughout the district that promote positive student connections and community, strengthen adult-student relationships, and build a sense of individual belonging in the schools." PAUSD places a high value on this policy and historically has made efforts to maintain a connection between a child's place of residence and place of education. For example, following the development of Stanford's University Terrace residential project, Barron Park Elementary had the most capacity for new enrollment, but it is further from the development than Nixon Elementary. Rather than reassigning existing students, disrupting their connections to school, or forcing new students to travel outside their neighborhood to attend school, PAUSD absorbed the new students into Nixon Elementary, bringing it even closer to capacity.

Moreover, reassigning students to schools outside of their residential neighborhoods would likely result in secondary environmental impacts. For example, shifting students from Escondido Elementary or Nixon Elementary to Barron Park Elementary would require students to cross Page Mill Road, exacerbating traffic impacts (and the attendant noise, greenhouse gas, and air quality impacts) and creating safety concerns by increasing the potential for traffic accidents involving pedestrians. The Recirculated Draft EIR claims that PAUSD could "reactivate" other existing school sites or use school properties leased to other providers, including the Ventura site, to meet the demand created by new students. (Recirculated Draft EIR p. 2-161.) As an initial matter, the Ventura site is not owned by PAUSD, and the EIR should be corrected to reflect this fact. Furthermore, none of the sites or schools listed in the Recirculated Draft EIR are located in the neighborhoods where new development is proposed. Even if it were feasible to use sites identified in the Recirculated Draft EIR, assigning children to schools outside of their neighborhoods would result in the same increase in traffic, noise, greenhouse gas, and air quality impacts discussed above. Despite these

facts, the Recirculated Draft EIR makes no effort to address these secondary impacts, even though case law makes clear that "these types of impacts to the nonschool physical environment are caused *indirectly* by the project and should be considered in the EIR." (*Chawanakee Unified School Dist.* 196 Cal.App.4th at 1029.)

Similarly, the Recirculated Draft EIR makes no effort to address how development fees would be used or analyze the environmental effects associated with developing new PAUSD facilities that would be required to serve Stanford's development. In order to maintain PAUSD neighborhood enrollment standards, for every 400-500 new elementary students generated by Stanford, PAUSD would need to construct an additional neighborhood school, with each school requiring a three to four-acre site. New schools would need to be carefully sited to ensure they serve neighborhoods where they are needed and maintain effective classroom sizes in accordance with BP 7110, but their development would be sure to influence traffic patterns, increasing vehicle miles traveled throughout the City and associated impacts such as greenhouse gas emissions and air quality. However the Recirculated Draft EIR ignores the secondary potential environmental impacts associated with this new development that would be needed as a direct result of Stanford's development.

In addition to failing to discuss the indirect environmental effects of the project or the alternatives, the Recirculated Draft EIR ignores Stanford's impact on PAUSD's ongoing operations. Using the conservative student generation rate of 0.98 discussed above, the 2,892 additional units created under Additional Housing Alternative A would result in 2,834 additional students enrolling in PAUSD (nearly twice as much as the Recirculated Draft EIR discloses). The cost of educating these additional students generated by Stanford's development would exceed \$51 million per year, maintaining PAUSD's current expenditure per student. PAUSD is a "basic aid" school district, and so it get very limited state funding; its operations are essentially funded directly by property taxes in Palo Alto. Much of Stanford's development is on land that is exempt from paying property tax, yet the EIR and other project documentation is silent regarding how PAUSD and the people of Palo Alto can be expected to educate the incoming students created by Stanford's development while maintaining the level of excellence for which PAUSD is known.

Therefore, the EIR must be revised to include analysis of the project's environmental effects and recirculated so that the public has the opportunity to consider and comment on the development's full range impacts.

\*\*\*\*

As demonstrated throughout this letter, the Recirculated Draft EIR does not yet provide a legally adequate analysis of the project's or the alternatives' environmental effects. The EIR must be revised to clarify what Stanford intends to develop, disclose the full nature of the project's impacts, and include legally adequate mitigation for those impacts.

July 23, 2018  
Page 7

We hope that the EIR can be revised to address these concerns and recirculated so that decision-makers and the public can understand the true impacts of the Stanford's proposal before deciding to support its approval.

Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, appearing to be 'KT' followed by a long horizontal stroke.

KAREN M. TIEDEMANN

cc: Palo Alto Unified School District Board of Trustees  
Dr. Don Austin, Superintendent



CITY OF  
**PALO  
ALTO**

## PLANNING & COMMUNITY ENVIRONMENT

250 Hamilton Avenue, 5th Floor  
Palo Alto, CA 94301  
650.329.2441

July 24, 2018

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

Dear Mr. Rader,

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

The City of Palo Alto supports Stanford University's (University) academic interests and recognizes and appreciates the positive contributions, direct and indirect, that the region, and specifically, Palo Alto, receives from the University's location. And, we believe that Palo Alto's reputation for its excellent residential neighborhoods, pedestrian-oriented commercial districts, spirit of innovation, community parks and schools, likewise enhance the University's appeal when recruiting Stanford Affiliates<sup>1</sup>.

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

### Environmental Consequences of Off-Campus Housing (New Significant & Unavoidable Impact)

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

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

---

<sup>1</sup> Includes students, faculty, staff, and other workers



CityOfPaloAlto.org



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

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

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

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

#### Housing Alternatives: Traffic and Air Quality

The City appreciates the County's incorporation of the Housing Alternatives (Alternatives). The comments in this section relate primarily to Alternative A. The Alternative includes 2,342 additional on-campus housing units, but otherwise retains all other components of the Project. Operational emissions from the new housing units results in three new significant and unavoidable impacts related to air quality (PM<sub>10</sub>). Ninety-four percent of these emissions are attributed to mobile sources.

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

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

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

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

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

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

#### Housing Alternatives: Aesthetics

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

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

#### Housing Alternatives: Project Objectives

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

#### Housing Alternatives: Public Services

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

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

#### PAUSD Impacts

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

Previous Comments on DEIR

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Lait', written over the printed name.

Jonathan Lait, AICP  
Interim Director

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





COMMITTEE FOR  
GREEN FOOTHILLS

July 24, 2018

David Rader  
Santa Clara County Planning Office  
County Government Center  
70 W. Hedding Street, 7th Floor, East Wing  
San Jose, CA 95110  
E-mail: [david.rader@pln.sccgov.org](mailto:david.rader@pln.sccgov.org)

Re: Comments on Stanford 2018 General Use Permit Draft EIR – Recirculated Portions

Dear David,

This constitutes the comments of the Committee for Green Foothills on the Recirculated Portions of the Stanford 2018 General Use Permit (GUP) Draft Environmental Impact Report (DEIR). Please note that Committee for Green Foothills has previously provided oral comments on the DEIR at the community meetings held by the County on October 19, 2017 and January 23, 2018. We reiterate those comments in this letter and provide new comments on the new Recirculated Portions of the DEIR.

Permanent Supermajority Vote Requirement on Academic Growth Boundary

To reiterate our oral comments on the DEIR, we believe that the supermajority vote requirement on any changes to the Academic Growth Boundary (AGB), which currently expires in 2025, should be made permanent. The AGB was established in the Stanford Community Plan in 2000. The Community Plan requires that 4 out of 5 Supervisors vote to approve to move, change or abolish the AGB up until the year 2025. After that point, a simple majority is all that would be required to change the AGB or to allow development outside of that boundary.

The DEIR recognizes that the AGB is “the primary mechanism for promoting compact urban development and resource conservation on the Stanford campus.” DEIR, p. 5.10-5. As with the Urban Growth Boundaries that have been adopted by many California cities, the AGB serves to unequivocally delineate the boundary line of where urban growth stops and open space begins. These boundaries protect against the incessant pressure of creeping sprawl that destroys open space and conservation lands, increases the cost of providing services to such sprawling development, and worsens air pollution and greenhouse gases through the increased traffic that low-density, dispersed development creates. The State of California has identified preservation of natural lands as an important element of meeting the state’s climate change goals, and has declared that natural lands should be maintained as a carbon sink in order to combat climate change.

Santa Clara County’s General Plan states that the unincorporated county area is not the place for intense development uses. Cities, if they want to annex unincorporated land in order to grow beyond their boundaries, must apply to Santa Clara County LAFCO, the agency which is required to weigh the importance of preserving open space and agricultural lands and the ill effects of sprawl on both open space and efficient delivery of services, before approving any annexation request. Since Stanford is not under the jurisdiction of LAFCO or any other independent body whose mission is to examine these impacts, it becomes more than ever important that the safeguards against approval of sprawling development in the foothills is higher than a simple majority of the 5-member Board.

COMMITTEE FOR  
GREEN FOOTHILLS

There is no reason why the 4/5 vote requirement should not be made permanent. Such a requirement would in no way prohibit eventual changes to the AGB, should 4 out of 5 future Supervisors determine that this would be of benefit to the County and the community. Merely, it places a slightly higher level of scrutiny on such a decision. We also note that Stanford has stated in their Application for the 2018 GUP that any of the growth scenarios they have considered for development through the year 2035 (the life of the GUP) can be accommodated within the AGB. For these reasons, we believe the supermajority vote requirement should be made permanent.

#### Comments on Project Alternatives Analysis

We appreciate the County's analysis of the two additional project alternatives (Additional Housing Alternatives A and B), as well as the added analysis of the environmental consequences of off-campus housing under the proposed Project. This analysis shines a much-needed light on the fact that construction of job-creating development such as commercial or industrial facilities (or, in this case, academic and academic support facilities) inevitably results in traffic and air quality impacts not just directly from the development in question, but also indirectly from the housing demand that would be created. It is clear from the County's analysis that the proposed Project's amount of academic and academic support development (2.275 million square feet) will create demand for approximately 5,699 new housing units, whether those units are located on campus, off-campus in nearby cities, or even outside the Bay Area entirely. Although building this new housing on or near campus will reduce the impacts related to daily commute trips, this reduction is itself reduced by Stanford's TDM program and by the fact that for residential units with more than one working occupant, unless all members of the household work on the Stanford campus there will be daily commute trips by residents living on the Stanford campus but working elsewhere. And as the DEIR acknowledges, residential development creates a multitude of local vehicle trips for purposes other than commuting to work. "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." DEIR 2-377 (Recirculated Portions).

It is clear from the County's analysis that not only are the impacts of the proposed Project (and the housing demand that would be created by the Project) greater than our region's transportation infrastructure is capable of accommodating, but the same is true of Alternative A and Alternative B, as well as of the No Project/Individual Use Permits Alternative and the Historical Preservation Alternative. The only alternative evaluated in the DEIR that will not result in an unjustifiable rate of growth is the Reduced Project Alternative, which includes only 1.3 million square feet of academic development. However, because the Reduced Project Alternative does not include sufficient housing to accommodate the demand it creates, **the DEIR must again be revised to include an analysis of the impacts of that housing demand.**

Decades of unbalanced jobs/housing development in Silicon Valley have led to a situation where housing is both scarce and too expensive for the average resident to afford. This has resulted in Silicon Valley's workers relocating to the East Bay, southern Santa Clara County, and even outside the Bay Area entirely in order to find housing within their budget. The result is not only a housing crisis but also clogged freeways and hours-long commute times. Stanford faculty, staff, and support services, as well as Stanford Hospital and medical staff, have all been impacted by this increasingly unbalanced jobs/housing ratio.

What the DEIR demonstrates is that the solution cannot be merely to continue with the pattern of exploding commercial development while attempting to solve our housing and traffic problems by increasing the amount of local housing built. As the DEIR shows, the result of that strategy would be even greater traffic with its accompanying air quality and greenhouse gas impacts, as well as cumulative impacts on parks, urban services, schools, and the like. To protect the environment and preserve quality of life in Santa Clara County, it is necessary to slow down the rapid rate of commercial development that has been prevalent in recent years. This includes reducing the rate of academic and academic support development on the Stanford campus.



Given this context, Stanford's asserted goal for the Project of maintaining its historic annual growth rate (DEIR p. 3-2) is unrealistic, both in terms of the historic growth rate for academic and academic support facilities and for student and faculty housing. There is no environmentally responsible way for the GUP to include the proposed 2.275 million square feet of academic and academic support facilities when, as the analysis in Alternatives A and B demonstrates, this development will create demand for 5,699 new housing units that will then create significant and unavoidable new environmental impacts. The DEIR acknowledges this fact in the section on "Environmental Consequences of Off-Campus Housing." DEIR p. 2-7 (Recirculated Portions). Whether those housing units are located on campus or off, or whether they are considered part of the Project or not, those impacts will still exist; and it is the County's responsibility to its residents to consider the result on the environment and quality of life. Therefore, the Project, Alternative A, and Alternative B all suffer from the same fundamental flaw: the amount of academic and academic support development is too high.

However, the Reduced Project Alternative, though it proposes only 1.3 million square feet of academic and academic support facilities, fails to provide sufficient housing to accommodate that level of academic development. Although the DEIR does not identify what the increased housing demand would be from the Reduced Project Alternative's level of academic development, based on the fact that the Project's 2.275 million square feet would create demand for 5,699 new housing units/beds, it is clear that the 1,800 units/beds included in the Reduced Project Alternative will not be sufficient to accommodate its 1.3 million square feet of academic development.

For this reason, the County must evaluate a new project alternative – one that will include the Reduced Project Alternative's lowered level of academic development, but that will include the creation of housing (on-campus or off-campus) to accommodate the increased housing demand.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alice Kaufman", with a long, sweeping horizontal line extending to the right.

Alice Kaufman  
Legislative Advocacy Director, Committee for Green Foothills

July 24, 2018

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

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

Dear Mr. Rader:

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

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



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

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

#### I. Housing Impacts

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

Allowing Stanford to elect to provide the number of housing units required by the new alternatives at any off-site location, and to locate affordable off-site housing "within one half mile of any major transit stop or a high quality transit corridor<sup>1</sup> in the Bay Area" (p.2-7 of the Recirculated DEIR) significantly diminishes the ability of this measure to effectively mitigate the impact of the project on housing in San Mateo County. We are similarly concerned that the six-mile radius in which affordable housing would be constructed, as described on pages 2-254 for Alternative A and on page 2-259 for Alternative B, does not provide assurance that the housing impacts experienced within San Mateo County will be adequately mitigated. As detailed in our comments on the DEIR, it is essential that Santa Clara County recognize the direct and significant impacts that Stanford's growth has on San Mateo County, particularly on San Mateo County's housing supply. The assumption that these impacts can be reduced in any meaningful way by constructing housing anywhere within the Bay Area, or within a six-mile radius, under

---

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

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

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

## II. Transportation Impacts

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

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

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

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

assumptions to fully evaluate any impact the proposed project and the new alternatives may have, and to develop and implement the necessary mitigation measures.

With regard to the intersection of Middlefield and Marsh, the recirculated DEIR indicates that mitigation measures may not happen in time to address the impact of the two new alternatives, and that the impacts will therefore be remain significant and unavoidable. This intersection experiences congestion during peak hours today and any additional impacts at this intersection will affect unincorporated San Mateo County communities in North Fair Oaks and Menlo Oaks. Greater attention to how these impacts can be avoided and mitigated must be provided in order to prevent the project from creating undue hardships on San Mateo County residents.

We also have serious concerns about the impacts of the alternatives introduced by the Recirculated DEIR, as well as that of the proposed project, on traffic, circulation, and bicycle and pedestrian safety along portions of Santa Cruz Avenue, Alameda de las Pulgas, and Alpine Road, within the unincorporated San Mateo County neighborhoods of West Menlo Park and Stanford Weekend Acres. A more detailed analysis of the specific impacts posed to these community from increased Stanford commuter and construction traffic, and greater specificity about how these impacts will be mitigated, should be provided.

The recirculated DEIR also does not clearly define what specific pedestrian and bicycle improvements are to be implemented in conjunction with the new alternatives. San Mateo County requests that Stanford participate and contribute to safety improvements and bike lane gap closures in the Santa Cruz Avenue corridor from Sand Hill Road north through Alameda De Las Pulgas to minimize impact on congestion and improve safety.

Similar to the DEIR, the recirculated DEIR has made some unreasonable assumptions with regards to calculation of Vehicle Miles Traveled (VMT) in counting the undergraduate population as part of the calculation. This has significantly reduced any VMT impact of the project in an artificial manner. San Mateo County requests that VMT calculations be re-done with more accurate representation of the population in the per capita calculations.

Like the proposed project, the alternatives studied by the recirculated DEIR will have significant and unavoidable impacts on transportation. The questions and issues we raised regarding these impacts in our comments on the DEIR are applicable to the alternatives contained in the recirculated DEIR and are incorporated within this letter by reference. For example, San Mateo County reiterates its expectation to be involved and to have a representative in any oversight committee established by Santa Clara County to monitor the mitigation and fund distribution for this project. It is unfortunate that no effort was made to respond to or clarify these comments within the recirculated DEIR.

Finally, we note our concern about the significant and unavoidable transportation impacts that will be incurred by allowing Stanford to construct non-affordable units under the new alternatives anywhere within the Bay Area. These impacts underscore the importance of

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

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

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

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



Dave Pine

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



**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!

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.

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.

### **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.

### **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.

### **Construction Impacts – noise and fugitive dust**

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.

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.

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.

### **Wildland Fires**

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.

### **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.

**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.





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

July 25, 2018

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

Dear Board President Simitian:

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

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

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

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

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

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

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

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

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

Sincerely,



---

Ruben Abrica, Mayor

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



July 25, 2018

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

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

Dear Mr. Rader,

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

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

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

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

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

2

Sincerely,

A handwritten signature in blue ink, appearing to read 'Peter Ohtaki', is written over a faint, light blue rectangular background.

Peter Ohtaki  
Mayor

Enclosures:

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



### **Project Description Concerns and Questions**

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

## **Transportation**

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

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

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

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

## **Housing**

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



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

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

### **Hydrology/Water Quality**

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



February 1, 2018

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

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

Dear Mr. Rader,

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

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

Sincerely,

Peter Ohtaki  
Mayor

Enclosure

**Project Description Concerns and Questions**

1. Stanford is seeking “flexibility with accountability.” The application and DEIR indicate that the total amount of academic square footage may take many forms, from classroom buildings to art galleries to energy facilities. Similarly, the anticipated housing units/beds will include a range of products from undergraduate dormitories to single-family homes for faculty. These different uses will have disparate impacts. Without specificity as to the amount, location and intensity of the various uses, there are no assurances that the impacts have been adequately assessed in the DEIR. Further, there is no mention in the DEIR that further study will be conducted to determine whether what does eventually get built is within the parameters of the DEIR or creates additional impacts that require additional mitigation. This seems critically important for a document that is anticipated to govern development for the next approximately 17 years in an area that is seeing rapid transition in local and regional conditions and circumstances. The City requests that clear accounting of the proposed uses and location of such uses be documented, and no changes to the provided allotments of developable area be allowed without a full assessment of any further environmental impacts. Further, as evidenced by the Center for Academic Medicine project application, any transfer of development request needs to include explicit consultation with and notice to the City of Menlo Park, particularly in the area of traffic concerns. The City has included recommended revisions to Condition of Approval G11 from the 2000 GUP, which are outlined below in comment 6.
2. The 2018 GUP should preserve the Academic Growth Boundary and the extra increment of foothill protections (i.e., the 4/5ths vote for development west of Junipero Serra Boulevard) in order to ensure ongoing open space and conservation efforts are recognized as a serious concern. The City requests the Academic Growth Boundary be preserved for at least the next 50 years.
3. The maximum build out of the Stanford campus should be identified, defined and evaluated in the 2018 GUP and DEIR. Such definition was required during the 2000 GUP development, as a condition of approval, but has not yet be identified or imposed here. This is important to provide the community and neighboring jurisdictions a clear picture of when growth limits would be reached; further, the current process provides no assurances to the maximum extent of growth and development on the campus.
4. Stanford will be increasing the population of students, faculty, staff and other workers from 41,217 in 2018 to 50,827 by 2035. However, it is not clear that these numbers reflect the full picture and include families of students and faculty, deliveries, consultants, contractors and various visitors who travel to and from Stanford. The assumptions should be clearly outlined in the DEIR.
5. The 2018 GUP and DEIR should evaluate changes in the Project Description, or as mitigation

measures to:

- a. Prohibit an increase in net new parking spaces
  - b. Provide a direct roadway connection from Campus Drive West to I-280 between Page Mill Road and Alpine Road without a connection at Junipero Serra Boulevard. Also force traffic to use Page Mill Road over Alpine Road since there are limited residences along Page Mill frontage
  - c. Add locations for traffic monitoring at gateways to Stanford Land beyond the cordon locations that are specific to unincorporated Santa Clara County to account for development in the Quarry, Lathrop and San Juan districts (see comment 7.k.ii. below)
  - d. Require trip credits to have some spatial or geographic relevance based on Gateways and cordon limits around the Stanford campus
6. In the 2000 GUP conditions of approval, condition G11 required project-specific traffic studies for certain projects. Subsequent to adoption of the 2000 GUP and conditions, the County prepared *Scoping of Project-Specific Transportation Studies under Stanford GUP Condition of Approval G11* (dated January 16, 2002). These documents do not directly address the need for a project-specific traffic study for relocation of planned development levels across Campus district boundaries, and the City requests this document be modified, if to be carried over for use subsequent to the 2018 GUP. Further, the City requests that a project-specific traffic study be completed for all projects that generate over 50 peak hour trips to ensure transparency and consistency across future proposals. The City has documented suggested revisions, as included in Attachment A. Further, the City requests that the Board of Supervisors must consider any request to relocate development to a different district, and approval be required to reach a 4/5 vote in favor, including the Supervisor from the District.

## **Transportation**

7. The transportation analysis shows several deficiencies with respect to<sup>1</sup>:
- a. Existing congested conditions are not reflected in the intersection analysis.

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

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

---

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

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

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

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

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

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

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

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

gas impacts.

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

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

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

- iii. Monitoring of the program is infrequent and does not assure neighboring jurisdictions that the program achieves its goals on a typical basis. Monitoring occurs twice per year, and while conducted in typical traffic conditions, this limited frequency allows the potential for ongoing violations. The City requests the County modify the monitoring program to provide consistent, daily monitoring. Such monitoring and enforcement is conducted by the City for the Facebook Campus site in Menlo Park, and provides assurances that the trip limits are met on a daily basis throughout the year. This increased frequency is enabled more readily, since under the current proposal, Stanford and the County propose to use automated technology to conduct the counts in the future. The City requests that no new development be allowed beyond the 2000 GUP until such automated equipment and increased monitoring is in place.
- iv. The use of “cordon credits” and a campus-wide monitoring methodology allow Stanford to offset peak hour, peak direction vehicle trips occurring anywhere in the cordon area at the expense of other potentially affected roadways. In particular, the Sand Hill Road and El Camino Real (north of Stanford) corridors have not seen investment in infrastructure or program support to reduce vehicle traffic levels approaching the University from these directions, and traffic congestion has increased since the 2001 GUP analysis. In addition, the 2014 Annual Traffic Monitoring Report claimed 402 trip credits for bus trips across the cordon points and the number of transit passengers served outside the cordon area in



the evening peak hour, but no data is provided about how the individual cordon locations have increased or decreased over time. The City’s own traffic counts on Sand Hill Road (near the City of Menlo Park and Palo Alto border) show an increase in average daily traffic volumes from 30,550 vehicles to 33,900 vehicles per day between 1998 and 2017. The DEIR also does not disclose Marguerite transit ridership by route and stop to demonstrate which corridors are achieving trip credits per the allowance of “cordon credits”. The City requests the historic raw cordon count data and Marguerite ridership data be included in a revised and recirculated DEIR. The City requests that the cordon trip limits be established by sub-area or district to ensure that the levels of traffic in any one corridor are not adversely affected at the expense of others.

- v. Chapter 8 of the TIA details the tiered mitigation program steps if Stanford does not achieve the No Net New Commute Trips goal. However, as described in Section 8.1.1.3 through 8.1.1.5, Stanford would fund infrastructure changes and programs to reduce vehicle trips in the vicinity of the campus if the No Net New Commute Trip goal is not successful. This shifts the burden of mitigation to neighboring cities, when the mitigation is necessitated by Stanford’s non-compliance with the mitigation measure. Stanford should instead assume responsibility, in collaboration with neighboring agencies to design and construct physical infrastructure and provide resources to help implement necessary programs to reduce trips as identified in these sections. The City requests that a contribution towards the Middle Avenue Pedestrian/Bicycle Crossing, Dumbarton Rail Corridor, and Sand Hill Road-Santa Cruz Avenue-Alameda de las Pulgas-Alpine Road corridor improvements be prioritized for mitigation. The City also requests that penalties be assessed if the trip reduction goals are not met.
- vi. Section 8.1.1.5 of Chapter 8 of the TIA further outlines the payment methodology to determine Stanford’s fair share of the intersection improvements on a per trip basis. This section outlines that the proposed payments would be on an annual basis, and since the 2018 GUP is projected to carry development through 2035 (17 years), the total contribution towards all intersection improvements would be divided by 17. This proposed methodology does not mitigate Stanford’s contribution towards impacts in the City, and other neighboring agencies, as sufficient funds would not accrue to cover the construction cost of the necessary mitigation – which since a Project level impact (see comment 7.g. below) – is necessary to reduce the Project’s impact to a less-than-significant level. The proposed methods also do not account for escalation in construction costs over the life of the proposed 2018 GUP.
- d. All relevant near term projects should be included in the analysis. According to Table 2 in Appendix CON, the Stanford Shopping Center Expansion and Stanford Redwood City campus are not currently included as near-term projects, and should be included in the DEIR’s evaluation. Notably, the traffic analysis should be revised to include these projects, as traffic from the Shopping Center directly overlaps with the traffic accessing the University

from El Camino Real and Sand Hill Road; and traffic from the Stanford Redwood City campus will occur on Marsh Road, Bay Road, Bayfront Expressway, Middlefield Road and El Camino Real, among other streets in the area, which are also studied in the 2018 GUP DEIR. Not including the Stanford Shopping Center and Redwood City campus underestimates the near-term and cumulative traffic impacts. Further the DEIR should explicitly describe the anticipated interaction between the Stanford University campus and the Stanford Redwood City campus. The City requested this information in its NOP letter (comments 5, 6, and 8), but it was not provided in the DEIR.

- e. At the time the Stanford Hospital Expansion was considered by the City of Palo Alto, the City of Menlo Park challenged the traffic projections as underestimating the likely impacts of the project due to a significant allowance for TDM reductions. The City requests that the County independently evaluate the traffic projections used for the Hospital Expansion in the Background conditions of the DEIR transportation analysis and TIA.
- f. The traffic projections shown on El Camino Real and Sand Hill Road appear to be underestimated. The DEIR and TIA should be revised to correct the underestimation, impacts reevaluated, and recirculated with this substantial new information. For example:
  - i. Sand Hill Road/Santa Cruz Avenue (study intersection 7 in the TIA): certain traffic movements are shown to have less traffic under Background as compared to Cumulative conditions: the westbound left-turn (decreases by approximately 50 vehicles) and the northbound right-turn (experiences no change from Existing conditions, even with anticipated build out of the Stanford Hospital, 2000 GUP, and other projects in the area). Similarly in the cumulative conditions the westbound left-turn, southbound right-turn, eastbound left- and right-turns, and northbound left- and right-turns experience decreases of up to 200 vehicles per hour.
  - ii. El Camino Real/Ravenswood Avenue (study intersection 41 in the TIA): Background conditions does not appear to adequately account for the buildout of projects in the area as listed. In particular, the growth shown between Existing and Background conditions at certain movements in the 2018 GUP DEIR and TIA is less than that shown for the Middle Plaza at 500 El Camino Real project alone. For example, the westbound left-turn in the 2018 GUP DEIR shows growth of 9 vehicles in the AM peak hour, while the Middle Plaza EIR shows 70 vehicles. Similar concerns exist for the northbound through and right-turn movements, eastbound right-turn and southbound through movement.
- g. Project level impacts identified under Background Conditions should be fully mitigated.

The DEIR and TIA identify mitigation measures for Background plus Project conditions as fair-share payment towards potential physical improvements. CEQA, in sections PRC

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

h. Comments on specific mitigation measures

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

i. Bicycle and pedestrian impact evaluation and proposed mitigation

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

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

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

j. Neighborhood street impacts are not fully addressed

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

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

- k. The DEIR does not address the NOP comments the City provided as listed below.
  - i. Stanford is requesting continuation of a program to provide trip credit for off-campus transportation infrastructure improvements within the Cordon Credit Area, which includes properties owned by Stanford outside of Santa Clara County, including 500 El Camino Real and 2131 Sand Hill Road. The City requests that any required measures to reduce or mitigate impacts from the Middle Plaza at 500 El Camino Real project recently approved or 2131 Sand Hill Road project currently under review are not eligible for credits under the General Use Permit program, since this would result in double-counting the benefits of such measures.
  - ii. The Draft EIR did not address how vehicle trips from the proposed development areas outside the traffic cordon area, including Quarry, Lathrop, and San Juan in particular, will be addressed by the No Net New Commute Trips condition. The City requested the County modify the cordon area to incorporate these zones with additional proposed development.

## **Housing**

- 8. The proposed \$20 per square foot (plus CPI adjustment inflator) affordable housing impact fee is not adequate to mitigate the increased demand for affordable housing by the proposed 2018 GUP. The rate of housing construction costs has generally outpaced the CPI, so the fee as proposed does not keep pace with rising costs and will not allow construction of the identified housing unit demand within Menlo Park.
- 9. In addition, when Stanford University purchases or develops property for the provision of faculty and staff housing in adjacent jurisdictions, including both the City of Menlo Park and local school districts, the City and school districts lose property tax revenues from the property in perpetuity,

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

10. As availability of affordable housing continues to be a regional concern, the City requests that the County maximize additional benefits for housing supply for faculty, staff, and students, as well as for workers that may not be employed directly by Stanford, but work within the General Use Permit area. Specifically, the City requests that the full housing burden generated by the 2018 GUP be absorbed on the Stanford Campus, within the 2018 GUP development area. Further, the City requests the County retain the 6-mile radius for use of affordable housing fees, since the impacts are most concentrated locally near the Stanford University campus. Further, the City requests that funding from housing fees be dedicated to impacted cities, commensurate with the level of anticipated impacts (e.g., proportional to the number of units needed to house Stanford employees). The provision of such fees is one of the few strategies that can be used to help offset the housing impacts identified as a result of the 2018 GUP and should be maintained.
11. The DEIR acknowledges that Stanford’s growth pursuant to the 2018 GUP will require housing in adjacent jurisdictions such as Menlo Park. The DEIR anticipates 153 new housing units in Menlo Park. Since the growth with the 2018 General Use Permit is anticipated to be at the same rate as the 2000 General Use Permit, the anticipated units in Menlo Park may be under estimated because 215 units associated with the 2000 General Use Permit have been approved for construction in Menlo Park at the Middle Plaza at 500 El Camino Real site.

#### **Air Quality and Noise**

12. Given the comments regarding peak spreading, the air quality and greenhouse gas analysis should be reevaluated to determine the continued accuracy of the conclusions relative to reductions in pollutants, especially since a full 1/3 of emissions are anticipated from transportation sources.
13. Stanford is proposing to construct up to 40,000 net new square feet of child care centers and other services on campus. However, in the chapter regarding air quality (see Figure 5.2-1), the DEIR does not consider on-site sensitive receptors like the new proposed day care centers and should be revised to reflect this change.
14. Noise impacts on the Sand Hill Road corridor should be mitigated near residential uses.

### **Hydrology/Water Quality**

15. Stanford should be required to coordinate and cooperate, including funding, with the San Francisquito Creek Joint Powers Authority to provide meaningful large-scale upstream detention facilities to attenuate and manage flows in San Francisquito Creek.
16. The DEIR did not adequately respond to the City request that Stanford continue to work with the City of Menlo Park and other jurisdictions to develop a specific proposal for the detention of floodwaters on Stanford land that will result in a significant and measurable reduction in floodwaters reaching the floodplain areas within Menlo Park and neighboring jurisdictions. The City requests that existing and proposed runoff calculations from the project area for both the 10-year and 100-year storm event be provided for the City to review and that the impact be evaluated in a revised and recirculated DEIR. In addition, the City requests that any plans that show existing and proposed impervious improvements and potential alteration of drainage patterns be provided. Combined with the improvements downstream within San Francisquito Creek, the detention on Stanford land shall result in containment of flows from the 10-year and 100-year storm events within the detention site(s) and within the Creek to the extent feasible. The detention plan shall be designed and implemented by Stanford within a specific time line that is relative to the proposed development.
17. In addition, the City requests that the proposed General Use Permit include measures that either mitigate for increase flows and/or create no net increase in storm water runoff to the neighboring downstream communities that are located within the San Francisquito Creek Watershed Area.

### **Other Issues**

18. The DEIR dismisses the impact of new students, faculty and staff on neighboring library facilities positing that Stanford is an academic university with libraries and visiting a local library is not necessary. However, there are many reasons to visit a library--a college student's reason may be different from a faculty member who has a toddler and wishes to participate in story time at the library. If Stanford does not provide such services at its libraries, it is likely that there will be more visits to libraries in surrounding jurisdictions and potential impacts. The same is true of the impacts on parks and other community based recreation programs.
19. In anticipation of the Final EIR review period, the City requests that a minimum of 30 days be granted for public review.



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

1/16/02

### **Background**

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

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

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

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

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

### Projects Triggering Condition G11

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

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

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

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

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

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

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

### **Intent of Condition G11**

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

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

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

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

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

### **Procedure for Defining Study Scope and Content**

#### **I. Localized Access and Circulation Studies**

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

#### **II. GUP EIR Intersection Impacts**

##### **Stage A: "Screening" Analysis**

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

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

- Add 3. Whether local traffic conditions have changed substantially that differing impacts of the project could be reasonably expected.
1. Whether the project type and scale is similar to the examples listed as (a) through (f) in the Condition, *and*
  2. Whether trip distribution analysis indicates that the location or size of the applicable project would differ substantially from the assumptions in the GUP EIR in a manner that would increase the expected amount of GUP buildout traffic at one or more GUP EIR intersection(s).

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

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

#### Stage B: Impact Assessment and Mitigation Approach

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

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

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

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

1. For housing and parking projects, the assessment of traffic impacts at GUP intersections will use the same peak periods and same horizon year as used in the 2000 GUP EIR. The Condition G11 analysis will focus on the commute traffic peak periods, consistent with the 2000 GUP EIR. For special-event projects, such as the - performing arts center, whose specific peaks would occur outside the normal area-wide traffic peaks studied in the 2000 GUP EIR, event-related time periods would also be addressed. -

2. The assessment of traffic impacts at GUP intersections will use the same assumptions concerning changes in non-GUP background growth as used in the GUP EIR, unless new information shows a substantial increase or decrease in background traffic levels relative to those assumed for 2010 in the 2000 GUP EIR.

3. Once any changes in background assumptions necessitated under Step 2 have been taken into consideration, the amount of project-specific traffic at any 2000 GUP EIR intersection will be added. The resulting traffic will only represent a new significant impact if, when added to traffic from other already-approved GUP projects, the cumulative running-total GUP impact exceeds the threshold of significance stated in 2000 GUP EIR.

4. Mitigation required for any new significant impact would first look to the ability of mitigations already identified in the 2000 GUP EIR to mitigate the impact to less-than-significant, including both EIR-listed intersection modifications and "no net new commute trip" accomplishment.

5. Any mitigation required beyond measures already identified in the GUP EIR would include two alternative approaches: further intersection modification and further reduction in commute-trip generation.

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

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

Other impacted jurisdictions should also be consulted on the scope.



## **Summary**

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

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

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

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.

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.

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.

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.

Thank you for considering my comments.

Sincerely,



Peter Dreke-meier



**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

**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]

**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.

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

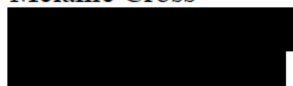
- 1) Stanford should first house its current students, faculty, staff and service workers on campus before they bring in any more. Stanford is the largest land owner in the county but doesn't want to use its land to solve any of the problems we are facing. Stanford's assertion that more housing on campus 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.
- 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.

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.

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.

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





From: [Molly Glennen](#)  
To: [avitha.kumar@pln.sccgov.org](mailto: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.
- 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 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.

## **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.

**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](mailto: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

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.

### **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.

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).

Now is the time to hold Stanford accountable.

Sincerely

Jeff Hawthorne

A black rectangular redaction box covering the signature area.

**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.

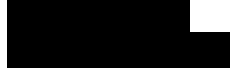
According to the Committee's newsletter which quotes the County's Draft Environmental Report, Stanford's proposed expansion will increase the number of students, staff and faculty at the University without providing commensurate, adequate increases in regional housing, roads, utilities, etc.

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



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.

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.

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.

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.

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:

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



**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.

Thank you  
P Machado



**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, 54, observable  
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 55 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 oblogingly 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.

Send comments to: David Rader, Senior Planner  
County Government Center, East Wing, 7<sup>th</sup> Floor  
70 W. Hedding Street, San Jose 95110  
david.rader@pln.sccgov.org

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

**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](http://www.SavePaloAltosGroundwater.org)



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.

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.

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.

### 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.

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."

### 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

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

#### 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.

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.



### 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.

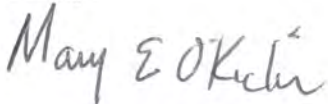
### Housing and Transportation

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.

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.

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

Sincerely,



Mary E. O'Kicki

Resident, Palo Alto

**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

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.

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

A black rectangular redaction box covering the signature area.

**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.



File: 33515  
Various

July 26, 2018

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

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

Dear Mr. Rader:

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

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

### **Biological Resources**

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

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

### **Hydrology and Water Quality**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Yvonne Arroyo  
Associate Engineer  
Community Projects Review Unit

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



# Recirculated DEIR Comments

## Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035)

July 26th, 2018

The Stanford Coalition for Planning an Equitable 2035 is a group of students that have been advocating for equitable outcomes from the General Use Permit (GUP) process. The group has been working with SEIU 2007, the labor union on campus that represents directly employed workers. SCoPE has primarily advocated for equitable outcomes in the areas of housing, transportation, labor provisions, and GHG emissions.

The Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035) has reviewed the recirculated analysis for the two additional Housing Alternatives. While we are very encouraged by the serious consideration of alternatives that will create more housing options for staff and workers on campus, we are concerned by some of the assumptions and conclusions made in the updated report that may skew public perception and the future evaluation of these alternatives. We have provided our comments and concerns below.

Sincerely,

SCoPE 2035

### **1) The updated transportation impact analysis relies on aggregated trip generation rates and questionable assumptions that lead to misleading VMT calculations.**

First, much of our concern with the analysis stems from the method used to extrapolate trip counts for staff and students that are moved to campus under the two Housing Alternatives. This applies both to the trip generation rates during peak commute periods used to determine local traffic impacts (see Table 2-1 Recirculated Appendices ALT-TIA pg. 6) and the daily trip generation rates used to determine VMT impacts (see Recirculated Appendices ALT-VMT pg. 3). In the former, faculty and staff are given the same peak hour rates of 0.430 during the AM peak hour and 0.450 during the PM peak hour, while in the latter, faculty, staff, and post docs are all given the same daily trip generation of 7.89 per day. These numbers will almost surely yield an inaccurate picture of the impacts under the two Housing Alternatives. The majority of the shifted population will be staff members, while the surveyed population used to derive the trip generation rates were likely predominantly faculty. We suspect that there are a number of reasons why staff may have different travel behaviors from faculty, including income and work hour flexibility differences. Therefore, we believe that disaggregation of trip generation rates is necessary.

Second, we are concerned about some of the assumptions made in the VMT calculations. It is puzzling that the same HBO and HBW trip lengths are used for students, staff, and faculty,



# Recirculated DEIR Comments

## Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035)

despite drastically different travel behaviors between the groups. While Palo Alto is perhaps geographically the closest comparison to determine these figures from the 2012 California Household Transportation Survey, there are seemingly many differences in travel needs, particularly among staff members. In addition, it seems strange that the HBW adjustment for residential VMT applies only to graduate and undergraduate students, and not to staff, faculty, or post docs. We recommend that the Stanford Transportation Survey be used to determine similar adjustments for these other categories.

Third, the comparison with the other project alternatives presented in the analysis creates misleading conclusions. In particular, it suggests that the FO alternative will increase residential VMT by 15%, while the HO alternative will increase residential VMT by 9% (Recirculated DEIR ALT-VMT pg. 9). This is not a fair comparison, however, because these scenarios include the VMT from non-Stanford members living in Stanford residences, which were not accounted for in the initial analysis. It must be underscored that both of these alternatives will certainly decrease regional VMT. While under these alternatives Stanford will take on some of the VMT that would otherwise be attributed to other jurisdictions, on the whole there will be transportation and greenhouse gas benefits from these alternatives. Although we recognize that proximity to transit exempts the project from this VMT analysis in the first place, these analysis results still weigh heavily in the public discussion, and it is important that this context not be forgotten.

### **2) Contrary to claims made in the recirculated DEIR, the two housing Alternatives would be in line with the goals of the GUP project.**

The DEIR claims that “Additional Housing Alternative A 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”, presumably referring to the following project objective from the General Use Permit Application:

“Enable Stanford to meet its needs to accommodate increasing enrollment and balance academic and academic support space growth with student housing growth by authorizing new and expanded student housing units/beds at a growth rate from 2018 through 2035 that is consistent with Stanford’s historic annual growth rate for student housing, not including the unique Escondido Village Graduate Student Residences Project.”

First, we notice that this project objective is centered around student housing units/beds and says nothing about faculty, staff, or worker housing. Given that the University already plans to build enough units to house undergraduates and most graduate students, the additional units required by Housing Alternative A would primarily be for faculty, staff, and workers. We fail to



# Recirculated DEIR Comments

## Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035)

understand how providing additional housing for these populations expands the student housing growth rate beyond historical growth rates.

However, if the intended spirit of the project objective is not properly reflected in the General Use Permit Application and the University hopes to keep all housing growth rates constant, we would like to note that this project objective then comes into conflict with other project objectives. Specifically:

Continue to implement the policies of the Stanford Community Plan, including policies promoting compact urban development, housing, single-occupant vehicle trip reduction, resource conservation, and health and safety.

Continue to allow Stanford flexibility to develop its lands within a framework that minimizes potential negative effects on the surrounding community ("flexibility with accountability").

The new **significant and unavoidable** impact 5.17-1 discussed in the Recirculated Draft states that "Under the proposed Project, the construction and/or operation of off-site housing would result in off-site environmental impacts." The County finds that the 2018 General Use Permit is expected to result in demand for 2,425 off-site housing units, generating significant air, transportation, and greenhouse gas impacts in surrounding jurisdictions. Furthermore, though housing market impacts are not legally required to be studied under CEQA, it is reasonable to say that the additional demand for off-site housing units will further exacerbate the housing crisis, causing further negative impacts as rising prices push Bay Area residents out surrounding communities. Therefore, allowing the 2018 General Use Permit to move forward as is conflicts with Stanford's stated desire to "promot[e] compact urban development, housing, single-occupant vehicle trip reduction, resource conservation, and health and safety" and "develop its lands within a framework that minimizes potential negative effects on the surrounding community".

Along these lines, we fail to understand what the County means when it says:

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





# Recirculated DEIR Comments

## Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035)

campus lands within unincorporated Santa Clara County for academic and academic support facilities, student housing, and faculty housing,”

We urge the County to clarify which of the clauses listed it is specifically referring to and provide reasoning as why.

Finally, with regards to the Stanford University Sustainable Development Study growth rates: the Sustainable Development Study examines hypothetical development under three growth rates, with the more aggressive rate being 5 million square feet of development between 2018 and 2035. Housing Alternative A would add an additional 2.5 million square feet of development in addition to the planned 2.275 million square feet. Therefore, even with the additional units of Housing Alternative A, the University would still fall within the range of growth studied by the Sustainable Development Study.

If this is not the case, we would also like it noted that the Sustainable Development Study explicitly states that: “This Study is not a development proposal. It is a planning exercise required by the Stanford Community Plan that sets the stage for ongoing dialogue that will continue to shape campus growth as development proceeds under the General Use Permit and as additional development is considered in the future. Actual development proposals will continue to be evaluated for their environmental and policy impacts by the County of Santa Clara.” The intention of the Study is to confirm that Stanford is following the requirements set by the 2000 GUP, not to inform or bind the 2018 GUP. We encourage that the County follow the guidelines set in the Development Survey, evaluating the General Use Permit on its “environmental and policy impacts”.

### **3) At a broader level, we are concerned that the updated analysis will lead the public to a false choice between housing and transportation impacts.**

Beyond these technical details, it is also important to acknowledge the impact this report has on the larger conversation surrounding the GUP. Stanford is proposing to bring thousands of additional faculty and workers to campus -- that is happening as part of the GUP regardless of whether they build more housing. And right now, Stanford is promising only a fraction of them housing, passing the burden onto local neighborhoods and jurisdictions. The Recirculated DEIR rightfully recognizes this on its own will have significant and unavoidable impacts on our community, let alone the many other impacts that are simply not considered by the DEIR. Without more on-campus housing, Stanford’s growth will acutely increase housing demand in local areas: we will see house prices continue to rise. More people will become homeless, be forced to live in their vehicles or to leave town because of untenable rents. Weighing this severe impact against traffic concerns, it certainly appears that having Stanford provide housing to



# Recirculated DEIR Comments

## Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035)

reduce pressure on local communities is the best option. Stanford is an experienced developer with the available land to provide housing for all of its workers, as well as students and faculty. Traffic impacts are important, but they can be mitigated quite easily by bolstering existing TDM

programs administered by Stanford. Ultimately, it will be easier for the University to mitigate traffic impacts caused by either of the Housing Alternatives than it will be to mitigate the significant and unavoidable housing impacts caused by the proposed project (5.17-1).

### **4) Finally, we object strongly to the arguments made by Stanford in response to this updated analysis.**

Throughout the public comment process, Stanford University has argued against the two Additional Housing Alternatives. In this letter, we have already addressed Stanford's concerns that fully internalizing housing impacts would increase local traffic (see section 1) and surpass historical student growth rates (see section 2). Here, we will respond to two other arguments made by the University: that additional housing will alter campus character, and that Stanford already does its fair share as an employer.

First, Stanford has said that additional housing will alter campus character by "disrupting" academic activity, displacing recreational facilities, and increasing building density and height. In reality, as stated earlier, Stanford's own inadequate housing policy has already changed the nature of campus and surrounding neighborhoods. Workers battling hours-long commutes or living in RVs on El Camino Real have degraded Stanford's visual appeal, as well as their own health. The University's veiled complaints about higher buildings and increased density are in fact protests against including and adequately providing for all Stanford employees and affiliates.

Providing staff, workers, and students with access to housing on campus will enrich our community rather than disrupt it. It will increase opportunities for intergenerational and interdisciplinary learning. This would fulfill the University's mission to foster outstanding and collaborative learning environments, not only for its students but also for faculty and staff.

Second, Stanford has repeatedly argued against fully mitigating its housing impacts by pointing to its current affordable housing contributions. Specifically, they have cited the University's affordable housing fund payments and the fulfillment of Santa Clara County RHNA requirements with Stanford graduate student housing. SCoPE maintains that counting Stanford graduate student residences as low-income units is an inappropriate and misleading practice. These units are only available to Stanford-affiliated graduate students, many of whom are dependents of above-moderate income families despite the fact that they have small earnings while in graduate school. That Stanford now argues these units should exempt them from providing



# Recirculated DEIR Comments

## Stanford Coalition for Planning an Equitable 2035 (SCoPE 2035)

low-income housing for their low-wage workers shows that this is a dangerous policy. Stanford should be required to build units that prioritize its low-income staff and workers, not just graduate students alone.

Additionally, Stanford's current \$56 million contribution to local affordable housing falls far short of the \$325 million need identified in the County's nexus study. Stanford's current and past contributions to affordable housing should not enable them to escape their ongoing responsibility to mitigate their impact on the local housing market.

**From:** [joe.singleton](mailto:joe.singleton@pln.sccgov.org)  
**To:** [Kumar, Kavitha](mailto:kavitha.kumar@pln.sccgov.org); [Rader, David](mailto:david.rader@pln.sccgov.org); [Supervisor Simitian](mailto:supervisor.simitian@bos.sccgov.org)  
**Subject:** gup objections  
**Date:** Thursday, July 26, 2018 5:09:02 PM

---

[kavitha.kumar@pln.sccgov.org](mailto:kavitha.kumar@pln.sccgov.org)  
[david.rader@pln.sccgov.org](mailto:david.rader@pln.sccgov.org)  
[supervisor.simitian@bos.sccgov.org](mailto: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

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.

#### **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.

**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.

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.

I appreciate your taking the time to consider my ideas.

Sincerely,  
Virginia Smedberg

[REDACTED]  
[REDACTED]