4.1 INTRODUCTION

Written comments on the Draft Environmental Impact Report (EIR) are reproduced in this section. Written comments received were provided to the City of Palo Alto by letter or via email. Discrete comments from each letter are denoted in the margin by a vertical line and numbered. Responses immediately follow each comment letter and are enumerated to correspond with the comment number. Response 19.1, for example, refers to the response for the first comment in Letter 19. The italicized text in the beginning of each response denotes a summary of each distinct comment. Many responses in this section refer to Staff-Initiated Changes and Master Responses, which are found in Section 3 of this document.

4.2 RESPONSES TO WRITTEN COMMENTS

Comment letters and responses begin on the following page.
Letter 1

STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

July 7, 2010

Steven Turner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Subject: Stanford University Medical Center Facilities Renewal and Replacement (SUMC Project)

Dear Steven Turner:

The State Clearinghouse submitted the above named Draft EIR to select state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on July 6, 2010, and the comments from the responding agency (ies) are (are) enclosed. If this comment package is not in order, please notify the Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(a) of the California Public Resources Code states that:

"A responsible or other public agency shall make substantive comments regarding these activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. These comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, you should contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Maayan
Acting Director, State Clearinghouse

[Signature]

Encl: Resources Agency

1409 10th Street
P.O. Box 3046
Sacramento, California 95812-3046
(916) 445-0613 FAX (916) 335-3018 www.cpr.ca.gov

Document Details Report
State Clearinghouse Data Base

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<tr>
<td>Project Title</td>
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<tr>
<td>Lead Agency</td>
<td>City of Palo Alto</td>
</tr>
<tr>
<td>Type</td>
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<td>Description</td>
<td>The SUMC Project includes demolitions, replacement, and expansion at the Stanford Hospitals and Clinics, the Lucile Packard Children's Hospital, and the Stanford University School of Medicine. The SUMC Project would demolish 9.2 million square feet of existing buildings at the SUMC site (which comprises a total of 68 acres) and construct 9.5 million square feet of hospital, clinic, and research facilities, for a net increase of 1.5 million square feet of hospital and clinic space (research space would not increase). In addition, 11 existing buildings would be renovated to meet seismic standards and 260,532 net new parking spaces would be added to the sites.</td>
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Lead Agency Contact

<table>
<thead>
<tr>
<th>Name</th>
<th>Steven Turner</th>
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<tbody>
<tr>
<td>Agency</td>
<td>City of Palo Alto</td>
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<tr>
<td>Phone</td>
<td>650-326-2100</td>
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<td>Address</td>
<td>250 Hamilton Avenue</td>
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<td>City</td>
<td>Palo Alto</td>
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<td>State</td>
<td>CA</td>
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<td>Zip</td>
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Project Location

| County | Santa Clara |
| City | Palo Alto |
| Region | |
| Lat / Long | 37° 28' 22" N / 122° 26' 37" W |
| Cross Streets | Postage: Palo Alto W/Alma St; Welch Rd/Quarry Rd |
| Parcel No. | 142-03-086, 04-012 |
| Township | 03 |
| Range | 3W |
| Section | 3 |
| Base | MDBM |

Proximity to:

| Highways | SR 80, I-280, US 101 |
| Airports | No |
| Railways | Caltrain |
| Waterways | San Francisco Creek |
| Schools | PALM, Addison |
| Land Use | MORI, PF, and A1; Major Institution/Specific Facilities, Recreation/Office Park, Major Institution/University Land/SEA |

Project Issues

| Environmental Impact | Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resource; Cumulative Effects; Drainage/Infiltration; Economic/Social; Flood Plain Flooding; Forest Land/Fire Hazard; Geologic/Sediment; Growth Inducing; Land Use; Minerals; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parcels; Schools/Universities; Sewer Capacity; Soft Environments; Transportation; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Waterfront/Recreation |

Relevant Agencies

| Resources Agency | Department of Fish and Game, Region 2; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Resources, Recycling and Recovery; California Highway Patrol; Caltrans; District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; Other Agency(ies) |

Data Received | 05/20/2010 Start of Review | 05/20/2010 End of Review | 07/08/2010 |

Note: Blanks in data fields result from insufficient information provided by lead agency.
1. Governor’s Office of Planning and Research, State Clearinghouse and Planning Unit, Scott Morgan (letter dated July 7, 2010)

1.1 The commentor acknowledges that the City of Palo Alto (City) has complied with the State Clearinghouse requirements for draft environmental documents per the California Environmental Quality Act (CEQA). The City acknowledges receipt of the State Clearinghouse comment letter indicating that the SUMC Project Draft EIR has been distributed to State agencies and departments for review and that the City has complied with the State Clearinghouse review requirements. No further response is necessary.
June 7, 2010

Steven Turner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301

DRAFT EIR, STANFORD UNIVERSITY MEDICAL CENTER FACILITIES RENEWAL AND REPLACEMENT (SUMC PROJECT), SCH# 2007082190

Dear Mr. Turner:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft EIR document referenced above and dated May 2010 for hazardous materials related issues. The due date to submit comments is July 6, 2010. As you may be aware, DTSC oversees the cleanup of hazardous substance release sites pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a potential Responsible Agency, DTSC is submitting comments to ensure that the California Environmental Quality Act (CEQA) documentation prepared for this project adequately addresses any remediation of hazardous substance releases that might be required as part of the project.

The project consists of demolition and construction of facilities at the Stanford University Medical Center. The following information was presented in the Draft EIR:

1) The site currently contains an office building, constructed in 1958, that has been used primarily as dental offices. Four amalgam separators are located in the basement of this building. Wastewater from each separator is conveyed to a sump that, in turn, discharges the wastewater onto either the landscaping or pavement at four locations outside the building. Also, an elevator shaft was added in 1993.

2) A Phase I ESA was completed for the site and recommended, prior to demolition, thorough testing of the four wastewater treatment sumps, sink piping and other surfaces for mercury, silver, tin, copper and zinc. An asbestos survey was recommended. A lead survey was recommended. Subsequent to building demolition, soils beneath the elevator shaft should be tested for PCBs and hydraulic fluid.

3) A Phase II Soil and Wastewater Quality Evaluation revealed elevated levels of mercury, silver, and zinc in soil impacted by discharges from the amalgam separator systems.

4) The Hoover Pavilion site, due to the operation of underground storage tanks, has VOC impacts to soil and groundwater.

DTSC has the following comments regarding the Draft EIR:

1) Soil and groundwater sampling should be performed to identify whether current or past chemical use may have resulted in a release of hazardous substances. This sampling should be conducted prior to or in conjunction with the preparation of the EIR. Any screening levels or criteria that are used in making a determination as to whether detected contaminants pose a risk to human health or the environment should be identified. If volatile organic compounds are present in soil or groundwater, the potential human health risk from vapor intrusion into future buildings will need to be considered.

2.1) Any remediation activities that are to be implemented as part of the project should be discussed in the EIR along with the cleanup levels that will be applied and the anticipated regulatory agency oversight. Potential impacts associated with the remediation activities should be addressed by the EIR. If the remediation activities include soil excavation, the EIR should include: (1) an assessment of air impacts and health impacts associated with the excavation activities; (2) identification of any applicable local standards which may be exceeded by the excavation activities, including dust and noise levels; (3) transportation impacts from the removal or remedial activities; and (4) risk of upset should there be an accident during cleanup.

If you have any questions, please call me at (510) 540-3556 or email me at

Sincerely,

Andrew Berna-Hicks, P.E.
Brownfields and Environmental Restoration Program

Steven Turner
June 7, 2010
Page 2 of 3
Steven Turner  
June 7, 2010  
Page 3 of 3

cc:  
Alyasa De La Cruz (via email)  
CEQA Tracking Center  
Department of Toxic Substances Control  
P.O. Box 808  
Sacramento, California 95812-0806  
ADelacr1@dtsc.ca.gov

Nancy Ritter (via email)  
Office of Environmental Planning and Analysis  
Department of Toxic Substances Control  
nriter@btsc.ca.gov

State Clearinghouse and Planning Unit (via email)  
Office of Planning and Research  
P.O. Box 3044  
Sacramento, California 95812-3044  
State.clearinghouse@opr.ca.gov
2. Department of Toxic Substances, Andrew Berna-Hicks, P.E. (letter dated June 7, 2010)

2.1 The commentor requests that soil and groundwater sampling be performed prior to or in conjunction with the preparation of the EIR and that screening levels be identified. As described on pages 3.12-38 through 3.12-40 of the Draft EIR in the Hazardous Materials section, four Phase I ESAs, one Phase II ESA, and other soil vapor and groundwater sampling were completed in order to assess the conditions at the SUMC Sites and identify potential hazardous conditions within the SUMC Project boundary. Specifically, these samples were conducted at 701 Welch Road, 703 Welch Road, 1101 Welch Road, and the Hoover Pavilion Site. The reports provide the applicable screening level criteria.

In addition to the studies already conducted, further soil and groundwater tests are required as Mitigation Measures HM-3.1 through HM-3.4, outlined on pages 3.12-40 through 3.12-41 of the Draft EIR. These additional tests would occur at 701 Welch Road (preparation of a Phase II ESA), 703 Welch Road (excavation of contaminated soils), and the Hoover Pavilion Site (preparation of a Soil Vapor Program and a Site Management Plan). Since preparation of the Draft EIR, the SUMC Project sponsors have completed additional tests, as well as the human health risk assessment described in Mitigation Measure HM-3.3 on page 3.12-41 of the Draft EIR. The health risk assessment shows there would be no significant impacts to health from the petroleum product in the soils at the Hoover Pavilion Site. With implementation of these mitigation measures, the significant impact on construction personnel and the public due to the exposure to contaminated soils and/or groundwater would be reduced to less than significant.

In addition, during construction activities at the SUMC Sites, unknown contaminated soils or groundwater could be discovered that would pose a risk of exposure to workers, the environment, and the community. Disturbance of unidentified contaminated areas and exposure of persons would be a significant impact. However, as required under Mitigation Measure HW-3.1 in Section 3.11, Hydrology, the SUMC Project sponsors would be required to develop a work plan for any unknown contaminated sites, which would reduce the impacts to less than significant. No further information can be provided at this time since no known contamination exists outside of the locations already analyzed.

The mitigation measures outlined in the Draft EIR, which include additional soil and groundwater sampling during construction, would be adopted as part of the SUMC Project approval and the SUMC Project sponsors would be required to comply. However, some additional studies have been conducted at the Hoover Pavilion Site, two of which occurred after the publication of the Draft EIR.
As such, the following text has been added after the first partial paragraph on page 3.12-20 of the Draft EIR.

*Additional Studies at the Hoover Pavilion Site.* From October 2008 through September 2010, the SUMC Project sponsors prepared and provided to the SCCDEH the following documentation which summarizes the environmental condition and the investigations and remediation that have been conducted at the Hoover Pavilion Site since 1986 to date in consideration of case closure:

- **October 31, 2008:** Request for Site Closure by AMEC Geomatrix, which discusses site closure for the two closed in-place 2,200 gallon diesel underground storage tanks and the results of a soil vapor survey to evaluate whether volatile constituents are present in the subsurface.

- **March 26, 2009:** an additional soil vapor survey was performed by AMEC Geomatrix and documented in the Additional Investigation Report for Delineation of PCE in the vicinity of Soil Boring SV-9.

- **May 25, 2010:** A Site Management Plan by AMEC was developed that established guidelines and health and safety requirements during construction for the following activities: notifications, air monitoring, soil excavation, soil stockpiling, on-site reuse of soil, off-site soil disposal or reuse, dust control, and groundwater management.

- **September 15, 2010:** Technical Summary by AMEC was prepared to discuss the regulatory status and closure activities, site information, previous investigations and results, summary of remedial measures and closure criteria.

The above AMEC reports concluded that residual petroleum is present in soil, particularly in the area of two 2,200 gallon, closed-in-place USTs that formerly contained fuel oil and diesel. Testing confirms that no petroleum constituents are present in soil vapor. Note that the presence of chlorinated volatile organic compounds (CVOCs) were also evaluated as part of the Hoover Pavilion Site (in soil) and found to be limited in concentration, area and depth, and presents no impacts to human health or the environment. The impacted area would be excavated as part of the SUMC Project parking garage excavation. Thus, all of the residual CVOCs and most of the petroleum impacted soil whose areal extent has been defined will be removed as part of the SUMC Project.

With respect to groundwater, the studies show no dissolved-phased constituents are present above environmental screening levels and the lateral extent of the plume is confined to the property. In two monitoring wells immediately adjacent to the USTs, 1/8 to 1/4 inch of product composed of a mixture of degraded viscous fuel oil (heavy fuel oil number 6) and degraded diesel has been measured; remediation of this product has been completed to the fullest extent practicable. CVOCs testing in groundwater are below the MCLs. Therefore, the Hoover Pavilion Site has been thoroughly
investigated and the cleanup meets the State’s standards and poses no threat to human
health or the environment.

2.2 The commentor requests that the Draft EIR discuss remediation activities to be implemented
as part of the SUMC Project, as well as the cleanup levels that would apply and the
anticipated regulatory agency oversight. As described on page pages 3.12-40 through
3.12-41 of the Draft EIR, Mitigation Measure HM-3.2 through HM-3.4 would remediate
the potential contaminated soils at 703 Welch and the Hoover Pavilion Site. Specifically,
HM-3.2 calls for conducting soils testing for mercury, silver, and pH levels in the 4- to 9-
square-foot area near every discharge point from the building located at 703 Welch. If the
soils are found to be contaminated, Mitigation Measure HM-3.2 calls for excavating,
removing, and transporting contaminated soil to an approved disposal site (which would be
in compliance with Occupational Health and Safety Administration [OSHA]). SUMC
Project sponsors would consult with the County Department of Environmental Health
(DEH) on all results and remediation actions.

Additionally, Mitigation Measure HM-3.3 in the Draft EIR calls for corrective action and
active measures to address the potentially contaminated soil at the Hoover Pavilion Site.
Specifically, under Mitigation Measure HM-3.3, a qualified consultant would remove all
buried underground storage tanks from the property; conduct additional soil sampling to
the extent necessary; and take steps necessary to ensure worker safety. Mitigation Measure
HM-3.3 has been amended to update the measures to treat and remediate the potentially
contaminated soil. This includes changes in the Summary, Section 3.12, and Section 5 of
the Draft EIR, as shown at the end of this Response.

Lastly, Mitigation Measure HM-3.4 calls for the development of a Site Management Plan
(site remediation assessment) for the Hoover Pavilion Site. The site remediation
assessment would (a) outline specific measures to protect workers and the public from
exposure to potential site hazards, including hazards from remediation itself, and (b) certify
that the proposed remediation measures would clean up contaminants, dispose of the
wastes, and protect public health in accordance with federal, State, and local requirements.

The commentor requests further information regarding the potential impacts associated with
the remediation activities discussed under Mitigation Measure HM-3.2 and H.M-3.3 with
regards to air impacts, dust and noise levels, transportation impacts from the removal of
soil, and risk of upset. As described on pages 3.5-14 through 3.5-17 of the Draft EIR in
the Air Quality section, emissions during construction, including remediation activities,
would be caused by material handling, traffic on unpaved or unimproved surfaces,
demolition of structures, use of paving materials and architectural coatings, exhaust from
construction worker vehicle trips, and exhaust from diesel-powered construction
equipment. Heavy construction activity or excavation on dry soil exposed during
construction phases or remediation would cause emissions of dust (PM10 being the air
pollutant component of greatest concern). To minimize dust emissions, the Bay Area Air
Quality Management District (BAAQMD) has identified a set of feasible PM$_{10}$ control measures for all construction activities in the air basin. Implementation of the BAAQMD-recommended measure, Mitigation Measure AQ-1.1, would reduce the impacts caused by construction dust to a less-than-significant level. Mitigation Measure AQ-1.1 calls for implementation of recommended dust control measures and strategies developed by the BAAQMD. These strategies include covering all trucks hauling soil, sand, and other loose materials including demolition debris, or require all trucks to maintain at least two feet of freeboard; water all active construction areas (exposed or disturbed soil surfaces) at least twice daily; and use watering to control dust generation during demolition of structures or break-up of pavement. These measures would minimize the transport of contaminated materials through the air because they would impede and/or minimize the transport of potentially contaminated soil and dust.

In addition, construction activities, including remediation activities, would require the use of heavy trucks, excavating and grading equipment, and concrete breakers. On-site construction activities would expose on-site noise-sensitive uses (especially the in-patient hospital uses at SHC and LPCH) to high noise levels from operation of multiple pieces of construction and excavation equipment working simultaneously. As described on page 3.7-23 of the Draft EIR in the Noise section, Mitigation Measure NO-1.1 would reduce the construction-related noise. Mitigation Measure NO-1.1 calls for the use of quiet construction equipment whenever possible, particularly air compressors; provide sound-control devices on equipment; prohibit unnecessary idling of internal combustion engines; require applicable construction-related vehicles and equipment to comply with the City’s truck route ordinance; designate a noise disturbance coordinator who would be responsible for responding to complaints about noise during construction; and require contractors to use noise-reducing pile driving techniques, including pre-drilling pile holes (if feasible, based on soils) to the maximum feasible depth, installing intake and exhaust mufflers on pile driving equipment, vibrating piles into place when feasible, and installing shrouds around the pile driving hammer where feasible. Remediation activities are very similar, if not the same, as to construction activities in terms of the level of noise generated by the equipment itself (i.e. excavating, hauling, etc). Therefore, all measures that mitigate construction related noise would also apply to remediation activity related noise. As discussed on page 3.7-23 of the Draft EIR in the Noise section, although the mitigation measures would not reduce pile driving noise at off-site sensitive receptors or other construction noise at on-site sensitive receptors to less-than-significant levels, it would lessen construction-related noise. The impact would remain significant and unavoidable.

The commentor requests further information on the potential impacts associated with the transport of potentially contaminated material. As noted on page 3.12-34 of the Draft EIR in the Hazardous Materials section, hazardous waste transporters are subject to both U.S. Department of Transportation (DOT) and United States Environmental Protection Agency (USEPA) regulations. The transport of hazardous materials include hauling of contaminated soil, as such, they are governed by the same regulations. The USEPA has
set forth standards applicable to transporters of hazardous wastes in 40 CFR 263. The DOT’s regulations are documented in 49 CFR 171-180 and implemented by the Research and Special Programs Administration (RSPA) within the DOT. These USEPA standards incorporate and require compliance with the DOT provisions on labeling, marking, placarding, using proper containers, and reporting discharges.

As noted on page 3.12-35 of the Draft EIR in the Hazardous Materials section, a transporter must comply with the following in accordance with USEPA regulations: comply with the manifest system; maintain the appropriate records (signed manifests) for three years; take immediate action to protect human health and the environment (e.g., notify local authorities or initiate interim measures) in the case of a discharge; in the event of a hazardous waste discharge, notify the National Response Center and submit a report to the DOT Office of Hazardous Materials Regulations; and clean up any discharges to the environment and take any actions required by the appropriate government officials for mitigating the discharge effects on human health and environment.

Transporters of hazardous wastes must also adhere to all of the Federal Motor Carrier Safety Regulations which DOT has adopted under the Motor Carrier Safety Act of 1984. This Act specifies more requisites that apply to the transport vehicle and the driver, including concise specifications for vehicle parts and accessories, such as lighting devices, brakes, glazing and windows, fuel systems, tires, and horns.

These existing regulations would ensure that the increase in hazardous waste materials would not substantially increase exposure to the community and surrounding environment. Furthermore, in the event of an accident or spill, the SUMC Project would implement its required emergency response plan (as part of the Hazardous Materials Business Plan [HMBP]) in coordination with the Palo Alto Fire Department (PAFD).

The commentor requests information regarding the risk of upset should there be an accident during cleanup. As noted on page 3.12-33, Table 3.12-8, in the event of an accident, the community and/or on-site workers should call the Palo Alto Fire Department and its Hazardous Materials Emergency Response Team.

The pathways through which the community or the environment (e.g., local air quality and biota) could be exposed to hazardous materials include air emissions, transport of hazardous materials to or from the site, waste disposal, human contact, and accidents. As mentioned above, Table 3.12-8, on page 3.12-33 of the Draft EIR, lists all of the primary means the SUMC Project sponsors would use to protect the community and the environment from exposure to hazardous materials, as required by law, such as California’s Hazardous Materials Release Response Plans and Inventory Law, the 2007 California Building Code, the 2003 Life Safety Code, the 2001 California Fire Code, the San Francisco Bay Regional Water Quality Control Board’s (RWQCB) groundwater protection program, Cal/OSHA’s Hazard Communication Standard, OSHA’s Bloodborne Pathogen Standard, hazardous waste laws and regulations, radiation control laws and
Based on the changes described above, Mitigation Measure HM-3.3 in Table S-4 on page S-81 of the Draft EIR has been revised as follows:

**HM-3.3 Conduct a Soil Vapor Excavation Program at the Hoover Pavilion Site.** A qualified consultant, under the SUMC Project sponsors’ direction, shall undertake the following activities:

- Remove all buried underground storage tanks from the property after sheds and storage buildings on the Hoover Pavilion site have been demolished;
- To the extent necessary, additional soil sampling shall be collected to determine health risks and to develop disposal criteria;
- If warranted based on soil sampling, contaminated soil shall be excavated, removed, and transported to an approved disposal facility in compliance with OSHA requirements;
- If warranted based on soil sampling, a human health risk assessment shall be prepared and implemented to determine potential for impacts on construction workers as well as to develop measures to ensure it is safe to redevelop the Hoover Pavilion Site within engineering controls (e.g., SVE or vapor barriers); and
- To the extent required based upon the results of soil sampling and the results of a health risk assessment (if applicable), a Site Health and Safety Plan to ensure worker safety in compliance with OSHA requirements shall be developed by the SUMC Project sponsors, and in places prior to commencing work on any contaminated site; and
- The SUMC Project sponsors shall cooperate with submit documents to the County DEH to proceed with closure of the Hoover Pavilion Site.

Draft EIR text under Mitigation Measures HM-3.3 on page 3.12-41 of the Draft EIR is revised as follows:

**HM-3.3 Conduct a Soil Vapor Excavation Program at the Hoover Pavilion Site.** A qualified consultant, under the SUMC Project sponsors’ direction, shall undertake the following activities:
- Remove all buried underground storage tanks from the property after sheds and storage buildings on the Hoover Pavilion site have been demolished;
- To the extent necessary, additional soil sampling shall be collected to determine health risks and to develop disposal criteria;
- If warranted based on soil sampling, contaminated soil shall be excavated, removed, and transported to an approved disposal facility in compliance with OSHA requirements; and
- If warranted based on soil sampling, a human health risk assessment shall be prepared and implemented to determine potential for impacts on construction workers as well as to develop measures to ensure it is safe to redevelop the Hoover Pavilion Site within engineering controls (e.g., SVE or vapor barriers); and
- To the extent required based upon the results of soil sampling and the results of a health risk assessment (if applicable), a Site Health and Safety Plan to ensure worker safety in compliance with OSHA requirements shall be developed by the SUMC Project sponsors, and in places prior to commencing work on any contaminated site.
- The SUMC Project sponsors shall cooperate with submit documents to the County DEH to proceed with closure of the Hoover Pavilion Site.

Draft EIR text on page 5-128, second bullet, is revised as follows:

- HM-3.3: Conduct a Soil Vapor Excavation Program at the Hoover Pavilion Site

Draft EIR text on page 5-159, after the second full paragraph, third bullet, is revised as follows:

- HM-3.3: Conduct a Soil Vapor Excavation Program at the Hoover Pavilion Site

Draft EIR text on page 5-188, third bullet, is revised as follows:

- HM-3.3: Conduct a Soil Vapor Excavation Program at the Hoover Pavilion Site

Draft EIR text on page 5-218, second bullet, is revised as follows:

- HM-3.3: Conduct a Soil Vapor Excavation Program at the Hoover Pavilion Site
July 27, 2010

City of Palo Alto
Department of Planning and Community Environment
250 Hamilton Avenue
Palo Alto, CA 94301

Attention: Steven Turner, Advance Planning Manager

Subject: Draft EIR and TIA for Stanford University Medical Center Facilities Renewal and Replacement Project

Dear Mr. Turner:

The Santa Clara Valley Transportation Authority (VTA) has reviewed the Draft Environmental Impact Report (DEIR) and Transportation Impact Analysis (TIA) for the Stanford University Medical Center (SUMC) Facilities Renewal and Replacement Project. We have a number of comments on these documents, which are included in the attached memorandum. However, I would like to highlight here the key themes from our review.

3.1 First, from a transportation planning perspective, we believe that the proposed SUMC Project represents an excellent opportunity to build on and make use of the existing transit and roadway network in the vicinity of the Palo Alto Transit Center. VTA supports policies and projects that target development around the established transportation cores, corridors, and station areas in Santa Clara County.

3.2 Second, we would like to commend the City and the project sponsor for the thorough analysis of all modes of transportation in the DEIR and TIA. It is clear that the City and the sponsor have given serious consideration to alternative modes of transportation in the analysis and proposed mitigation measures, which is consistent with the goals of the Santa Clara County Congestion Management Program managed by VTA.

Based on our review of the DEIR and TIA, we have a number of comments on the transportation analysis. Our detailed comments are included in the attached memorandum, but provided below is a summary of the most salient points:

• The Palo Alto Transit Center is an important component of Stanford’s transit program, offering critical, convenient access to VTA, SamTrans, and Dumbarton Express bus services, as well as Caltrain rail service. The SUMC Project will generate a considerable amount of additional passenger demand at the Transit Center through Mitigation Measures TR-2.3 and TR-7.2, which rely heavily on expanded transit service and transit incentives to reduce the project’s vehicular congestion impacts. Currently, the city of Palo Alto subleases the transit center and depot to VTA through a master lease the City has with Stanford. The terms of the current lease place an unsustainable and unacceptable burden on VTA’s transit enterprise fund that is used to provide bus and rail transit services. The current lease expires in 2013, and we cannot envision entering into a new lease with similar terms in the future. We request that, as a community benefit and partial mitigation for transportation impacts of the SUMC Project, the city of Palo Alto require Stanford University to negotiate a long-term solution with VTA to appropriately address the Transit Center lease and related issues.

VTA looks forward to working with the city of Palo Alto and the project sponsor to help advance the proposed project. Please do not hesitate to contact John Ristow at (408) 321-5713 if you have any questions or to discuss how we can work together with you in this process.

Sincerely,

Michael T. Burns
General Manager

cc: Dan Smith, John Ristow, Jim Unites, Bijal Patel, Roy McNeal, Robert Swierk, VTA
Brodie Hamilton, Stanford University Parking & Transportation Services

3301 North First Street - San Jose, CA 95134-1827 - Administration 408.321.3555 - Customer Service 408.321.2300

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses

3.1 The commentor expresses support for the SUMC Project. This comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Accordingly, no further response is necessary. Please refer to Master Response 9 for a discussion of SUMC Project merit in the CEQA process.

3.2 The comment commends the City for the thorough analysis of all modes of transportation in the Draft EIR and TIA. Please refer to Draft EIR Section 3.4, Transportation, for an analysis of the transportation impacts as a result of the SUMC Project. Since this comment supports the analysis provided in the Draft EIR and does not offer specific suggestions, no further response is necessary.

3.3 The commentor requests a long-term solution for the lease of the Palo Alto Intermodal Transit Service (PAITS). Please refer to Staff-Initiated Change 1 for further analysis of the SUMC Project’s impact on transit services. As explained in Staff-Initiated Change 1, the SUMC Project would not have a significant impact on transit services. Therefore, no mitigation measures for such impacts would be required under CEQA. It should be further noted that the City’s existing lease with Stanford does not expire until June 30, 2033 (unless the City terminates it sooner); therefore, unless the City chooses, at its option, to terminate its lease with Stanford sooner (February 26, 2013), it would be the City that would be negotiating any extension or lease with VTA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

3.4 The commentor states that VTA is not in the financial position to commit to any service expansions to meet the transit demands potentially created by the project. Additional analysis has been conducted for the Final EIR regarding impacts to transit. This analysis determined that the expansion of VTA transit service to support the project is not considered necessary due to the low number of new transit trips anticipated with the project. Please refer to Staff-Initiated Change 1 for the quantified transit analysis.
MEMORANDUM

TO: Steven Turner, Advance Planning Manager
   City of Palo Alto Department of Planning and Community Environment

FROM: Robert Swierk, AICP
   VTA CMA Planning Department

DATE: July 27, 2010

SUBJECT: Draft EIR and TIA for Stanford University Medical Center Facilities Renewal and Replacement Project

The Santa Clara Valley Transportation Authority (VTA) has reviewed the Draft Environmental Impact Report (DEIR) and Transportation Impact Analysis (TIA) for the Stanford University Medical Center (SUMC) Facilities Renewal and Replacement Project. We have the following comments based on our review.

Description of Existing and Future Planned Transit Services
The Draft EIR and TIA for this project do not mention VTA’s plans to introduce Bus Rapid Transit (BRT) service along the El Camino Real corridor. In May 2009, the VTA Board adopted the VTA BRT Strategic Plan, which looked at BRT on six corridors in Santa Clara County. The BRT Strategic Plan recommended three corridors for near-term implementation, one of which was the El Camino Real corridor. VTA has now begun Conceptual Engineering for the El Camino Real BRT project and has begun Preliminary Engineering for the connecting Santa Clara/Alum Rock BRT project. The proposed schedule for the new BRT service between the Palo Alto Transit Center and the Eastside Transit Center in San Jose is for service to begin in 2014. VTA believes that BRT can play a significant role in reducing single-occupant automobile trips to and from the SUMC Project site.

Proposed Project Plans – Mini Transit Centers
VTA supports the concept of establishing ‘mini transit centers’ within the SUMC Project site, as described in the DEIR and MITIGATION MEASURES – Palo Alto Transit Center. This measure would provide an attractive, convenient, and safe location for passenger activity. However, it is not clear from the DEIR whether the Marguerite Shuttle or other services, such as VTA bus routes, would serve these locations. The EIR should note that VTA is not planning to modify our route structure in this regard, and doing so would likely require additional operating funding that is not available.

Transportation Mitigation Measures – Palo Alto Transit Center
The Palo Alto Transit Center is an important component of Stanford’s transit program, offering critical, convenient access to VTA, SamTrans, and Dumbarton Express bus services, as well as Caltrain rail service. Mitigation Measure TR-2.3 indicates that the project sponsor would add additional passenger demand at the Palo Alto Transit Center. Mitigation Measure TR-7.2 discusses the possibility of expanding bus and shuttle service to support the demand generated by the project. It is logical to assume that many of these services would operate into the Palo Alto Transit Center. As Stanford is aware, this transit center and the adjacent loop road are already at capacity. The project EIR should evaluate the increased transit demands to be placed on this area and develop a plan to accommodate the additional vehicles. VTA recommends that the City require the project to fund any expansion or improvements necessary to accommodate the needs of the SUMC Project. If modifications to the Palo Alto Transit Center are needed to accommodate the demand generated by the SUMC Project or for other reasons (such as the California High-Speed Rail project), VTA will work cooperatively with the City and the project sponsor to explore opportunities for accommodating existing and future services, including Stanford’s Marguerite shuttles, within the Transit Center.

Currently, the City of Palo Alto subsidizes the transit center and depot to VTA through a master lease the City has with Stanford. The terms of the lease place an unsustainable and unacceptable burden on VTA’s transit enterprise fund that is used to provide bus and rail transit services. The current lease expires in 2013, and we cannot envision entering into a new lease with similar terms in the future. We request that, as a community benefit and partial mitigation for transportation impacts of the SUMC Project, the City of Palo Alto require Stanford University to negotiate a long-term lease solution with VTA to appropriately address the Transit Center lease and related issues. This requirement should be included in the mitigation monitoring and reporting program or as a condition of approval of the project to ensure that a new lease that addresses VTA’s concerns is in place as the SUMC Project progresses.

Transportation Mitigation Measures – Expansion of Transit Service
The discussion of Transportation Impact TR-11 on page 87 of the DEIR indicates that transit providers would adjust service frequencies and distribution to meet demand trends. It is important to note that VTA is not in the financial position to commit to any service expansion that may be needed due to the demands created by this project. The project sponsor should be prepared to financially support service expansion or modifications due to the project.

Transportation Mitigation Measures – VTA Community Bus Service
The discussion of Transportation Impact TR-7 (DEIR page 34-80) mentions VTA’s bus service operating plan (Comprehensive Operations Analysis) which introduced Community Bus Service to Santa Clara County. This section of the DEIR states that “As a part of that plan, local communities are required to cover 25 percent of the cost of VTA Community Bus Service if they want to have the service free of charge to the riders.” On the following page, the discussion of Mitigation Measure TR-7.2 states that “the SUMC Project Sponsors shall contribute to fund the project’s share of Palo Alto’s share of expanded Community Bus service.” However, the DEIR does not specify what is meant by “expanded” service.

We would like to note that VTA is not in the position to expand its Community Bus Service to meet additional need generated by the SUMC Project. If the SUMC generates additional demand on the existing VTA Community Bus Service in the area that exceeds the capacity of the service, the project sponsor should be required to contribute its fair share to any expansion to the existing service (i.e., new vehicles, additional trips during the current service hours). However, it should...
be noted that VTA has no plans to modify its routes, serve new areas, or increase the span of service of the existing routes in the area.

VTA would also like to clarify that the 25 percent reference above only applies to changing services that already have operating funding to be fare free to the riders. For instance, if VTA already operates a Community Bus route to an area and charges a fare, VTA can arrange for that service to be fare free if a public or private partner guarantees the target farebox ratio for the service (25 percent) by providing an equivalent financial contribution. However, it is not sufficient for a partner to provide 25 percent of the operating cost for a new service, since this formula would require VTA to fund the remaining 75 percent of the cost, and VTA does not have this funding available.

Transportation Mitigation Measures – El Camino Real/Page Mill Intersection

The discussion of transportation mitigation measures in the DEIR presents a series of possible intersection modifications and classifies them as either Feasible or Infeasible based on right-of-way constraints, physical barriers, and other considerations. The DEIR currently identifies a vehicular Level of Service impact at the El Camino Real and Page Mill Road intersection, proposes modifications to the intersection, including the addition of a turn lane on one approach and signal re-timing, and classifies these changes as Feasible.

We understand that the classification of the proposed intersection modifications as Feasible is a reflection of the fact that these modifications were included in the City’s 1998 Comprehensive Plan. We also recognize that these improvements were included in the 2003 Comprehensive County Expressway Planning Study; in the 2008 Update to the Expressway Study, this intersection improvement was removed, but the document noted that the project will be pursued by the city of Palo Alto.

However, VTA believes that the modifications proposed in the TIA may have a negative impact on bus operations along El Camino Real (the busiest route in the county) by creating a conflict between automobiles turning from Oregon Expressway onto El Camino and buses merging in and out of the bus stop just west of the intersection. In addition, the addition of a separate right-turn lane, if it is established as a free-right turn, may negatively impact pedestrian and bicycle access and safety. This would conflict with Policy TR-27 in the City’s Comprehensive Plan, which states that the City should “Avoid major increases in street capacity unless necessary to remedy severe traffic congestion or critical neighborhood traffic problems. Where capacity is increased, balance the needs of motor vehicles with those of pedestrians and bicyclists.” It is also worthwhile to note that VTA owns the parcel on the northwest corner of this intersection, directly adjacent to the proposed new right-turn lane, and operates a Park & Ride facility on this site. Any intersection modification that would require widening of Oregon Expressway or El Camino in this area would diminish the size, configuration, and access to this facility.

VTA therefore requests that only the improvements that will not have negative impacts on bus operations and bicycle and pedestrian safety be classified as Feasible in the EIR. VTA believes that any improvements that will require widening of the ROW, create a conflict with bus operations, or negatively impact bicycle and pedestrian safety should be classified as Infeasible.

If no feasible improvements can be implemented at this location, other off-setting mitigation measures should be included instead.

Transportation Mitigation Measures – Improvements to Bus Stop Facilities

As noted above, this project is expected to generate a significant increase in demand for transit services. In order to provide convenient access to bus transit service and as an off-setting mitigation measure, VTA staff recommends that bus stops in the vicinity of the SUMC Project be improved to meet VTA bus stop standards. VTA staff has reviewed the condition of the bus stops within the project site as well as on nearly all segments of El Camino Real, within the area of transportation analysis in the TIA and DEIR. We found that the bus stops within the project site have already been improved to meet VTA’s standards, but a number of stops nearby on El Camino Real have not been improved. We recommend that the project provide improvements to the following four higher-volume bus stops on El Camino Real:

Southbound El Camino, south of Gavilan
- 10’ X 75’ PCC bus stop pavement pad
- Install 8’ X 40’ sidewalk adjacent to bus stop, extend sidewalk to corner, install curb cut, install pedestrian crossing

Northbound El Camino, north of Embarcadero
- 10’ X 75’ PCC bus stop pavement pad

Westbound El Camino, west of California
- 10’ X 75’ PCC bus stop pavement pad

Westbound El Camino, west of Page Mill
- 10’ X 75’ PCC bus stop pavement pad

Transportation Mitigation Measures – Traffic Adaptive Signals

Mitigation Measure TR-2.1 calls for the SUMC Project to contribute to the cost of installing Traffic Adaptive Signal technology on a number of roadways in the vicinity of the project site. VTA requests that the City ensure that the implementation of this technology take into account pedestrian and bicycle access (including wait times at traffic signals) as well as bus operations at the affected intersections. In particular, we note that Bus Signal Priority is currently in place at intersections along El Camino Real in Santa Clara County to improve the travel times of the VTA Rapid 522 service. The City should coordinate with Caltrans and VTA when proceeding with Traffic Adaptive Signals to El Camino Real to ensure that bus operations, emergency vehicle operations, and pedestrian and bicycle access are not negatively impacted.

Transportation Mitigation Measures – Pedestrian and Bicycle Accommodations

VTA commends the City and the project sponsor for including significant design features and mitigation measures to improve pedestrian and bicycle access and safety within and near the project site. In particular, we support efforts to improve pedestrian safety between the SUMC area, the Stanford Shopping Center, and the Palo Alto Transit Center, such as those described in Mitigation Measure TR-6.1.
In addition, we would like to note that VTA is in the process of establishing a Bike Sharing Pilot Program, which could help manage transportation demand between the SUMC and the Palo Alto Transit Center as well as improve bicycle access in the area in general. Stanford University Parking & Transportation Services staff has participated in the study, which identified Palo Alto to be one potential hub for the bike sharing program. VTA encourages the City and the project sponsor, as a way of furthering the project’s auto trip reduction goals, to considering supporting the bike-sharing program by providing bike share “pods” at several strategic locations around the project site. VTA staff would be happy to discuss this idea with the City or the project sponsor in greater detail.

**CMP Intersection Analysis**
In addition to the Congestion Management Program (CMP) intersections analyzed in TIA report, VTA recommends the inclusion of the following CMP intersection in the TIA:
- Oregon Expressway / Middlefield Road
This recommendation is based on the VTA TIA Guidelines that state a CMP intersection shall be included in a TIA if the proposed development project is expected to add ten or more peak hour vehicles per lane to any intersection movement.

**Regional Trip Distribution Figure**
Figure 3.4-9 of the DEIR, and the accompanying figure in the TIA, shows 21 percent of the regional trips to the SUMC project site coming from US 101 to the south. It is our understanding that this 21 percent figure reflects the percentage on US 101 south of the San Antonio/Charleston interchange and that some percentage of project trips exit at this interchange. We understand that the actual trip distribution from the model has been used in the freeway analysis in Table 3.4-23, so this table and accompanying findings will not change, but we suggest that Figure 3.4-9 be revised to make it clearer that the 21 percent figure applies to US 101 south of the San Antonio/Charleston interchange.
3a.

Santa Clara Valley Transportation Authority (VTA) CMA Planning Department, Robert Swierk, AICP (letter dated July 27, 2010)

3a.1

The commentor notes that VTA has begun conceptual engineering to introduce bus rapid transit (BRT) in the El Camino Real corridor and asks why the Draft EIR does not specifically mention VTA’s future transit plans for the El Camino Real corridor. The Draft EIR notes that the project area is served by VTA’s 522 Rapid bus service. The 522 Rapid is the initial improvement for implementing BRT in the El Camino Real corridor. Additional improvements would improve transit access to the SUMC Project and would provide improved non-automobile access for the communities along El Camino Real, the Alameda, Santa Clara/Alum Rock, and Capitol Expressway.

Draft EIR text on page 3.4-33, third paragraph under Future Conditions, is revised as follows to provide additional information regarding proposed VTA BRT service between the Palo Alto Transit Center and the Eastridge Transit Center in San Jose:

2025 No Project. This scenario includes all of the growth in population and employment that is projected to occur between Existing Conditions and the year 2025. It also includes all of the highway and transit improvements that have dedicated sources of funding that are scheduled to be completed between Existing Conditions and 2025. Expected transit improvements include the proposed VTA BRT service between the Palo Alto Transit Center and the Eastridge Transit Center in San Jose. This scenario does not include the SUMC Project.

3a.2

The commentor notes that VTA supports the establishment of mini transit centers within the SUMC Project as described in Mitigation Measure TR-7.1. The commentor further notes that this measure would provide an attractive, convenient, and safe location for passenger activity, but notes VTA is not planning to serve the transit centers unless they receive additional operating funding to cover the cost of modifying their routes and schedules. A quantified transit service analysis completed for the Final EIR determined that existing VTA bus service is sufficient to accommodate transit demand created by the SUMC Project. Any expansion of transit service needed for the SUMC Project is confined to the Marguerite shuttles and the U-Line. The SUMC Project sponsors have incorporated enhanced bus stops into the Project to accommodate the Marguerite shuttles. Please refer to Staff-Initiated Change 1 for the quantified transit analysis.

3a.3

The commentor notes the importance of the Palo Alto Intermodal Transit Station (PAITS) as the node for several transit lines and recommends that the City require the SUMC Project to fund any necessary expansion required to serve the increase in transit trips due to the SUMC Project. Any expansion of transit service needed for the SUMC Project would be limited to the Marguerite shuttles and to the U-Line and would not require expansions of existing VTA routes. With regard to VTA’s concern regarding the capacity of the PAITS
to handle increased shuttle service, Stanford and VTA regularly communicate to coordinate shuttle space at PAITS and would continue to do so.

The City appreciates the support and cooperation of VTA and looks forward to cooperatively working together. Please refer to Staff-Initiated Change 1 for a calculation of new VTA riders resulting from the SUMC Project.

3a.4 The commenter expresses concern regarding the current lease between the City and VTA at the PAITS. Please refer to Staff-Initiated Change 1 for further analysis of the SUMC Project’s impact on transit services. As explained in this response, the SUMC Project would not have a significant impact on transit services. Therefore, no mitigation measures for such impacts would be required under CEQA. It should be further noted that the City’s existing lease with Stanford does not expire until June 30, 2033 (unless the City terminates it sooner); therefore, unless the City chooses, at its option, to terminate its lease with Stanford sooner (February 26, 2013), it would be the City that would be negotiating any extension or lease with VTA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

3a.5 The commenter states that Transportation Impact TR-11 indicates that transit providers would adjust service frequencies and distribution to meet demand trends, but that VTA is not in the position to expand bus service to serve increased demand created by the SUMC Project. Additional transit service analysis has been completed for the Final EIR regarding impacts to transit. This analysis determined that the existing bus service along VTA routes is sufficient to accommodate transit demand created by the SUMC Project. Any expansion of transit service needed for the SUMC Project is confined to Marguerite shuttles and to the U-Line. For further information, please refer to Staff-Initiated Change 1.

3a.6 The commenter states that Mitigation Measure TR-7.2 requires the SUMC Project Sponsors to contribute to fund the project’s fair share of Palo Alto’s share of expanded Community Bus service. Please refer to Staff-Initiated Change 1 for the discussion and revision of Mitigation Measure TR-7.2.

3a.7 The commenter notes that the proposed right turn lane at the El Camino Real/Page Mill Road-Oregon Expressway intersection may have negative impacts on bus operations on El Camino Real for buses pulling in and out of the bus stop located just north of the intersection. The commenter also notes that a free right turn lane would have negative impacts on pedestrians and bicyclists and would require right-of-way from the VTA parking lot located on the corner. This acquisition would diminish the size, configuration, and access to this facility. The right turn volume at this intersection from Oregon Expressway to El Camino Real is over 300 vehicles per hour in the peak hours. A right turn lane would greatly improve the operation of this intersection. The suggested right turn lane would not be a free right turn, but would be controlled by the traffic signal. Therefore, the new lane would not conflict with bus movements on El Camino Real nor would it have a
negative effect on pedestrians and bicyclists. The design of the right turn lane would take into account the impact on the adjacent park and ride lot. The existing curb lane is approximately 18 feet wide. By using some of this excess width to accommodate the added lane, impacts on the park-and-ride lot can be minimized. However, with implementation of other higher priority mitigation measures described in the Draft EIR (such as transportation demand management [TDM] measures, bicycle and pedestrian undercrossings, and traffic-adaptive signal technology), the right-turn lane would not be required to mitigate SUMC Project impacts.

3a.8 The commentor notes that the SUMC Project is expected to generate a significant increase in demand for transit services and that an off-setting mitigation measure would be to improve deficient bus stops. Please see Staff-Initiated Change 1 for a revised and quantified analysis of SUMC Project impact on transit. No mitigation is required.

3a.9 The commentor requests that Mitigation Measure TR-2.1 takes into account pedestrian and bicycle access, as well as bus operations. The City would ensure that the implementation of adaptive signal technology (ADT) would consider bicycle and pedestrian access (including wait times at traffic signals) as well as bus operations at the affected intersections. The City would also coordinate with Caltrans and VTA when proceeding with traffic-adaptive signals on El Camino Real to ensure that bus operations, emergency vehicle operations, and bicycle and pedestrian access are not negatively impacted.

3a.10 The comment encourages the City and the SUMC Project sponsors to consider providing bike share pods at several strategic locations around the SUMC Sites. During public hearings on the SUMC Project, the Palo Alto City Council also suggested bike sharing as an appropriate way to expand the Hospital’s TDM program. Please refer to Master Response 2 for a discussion of bike-sharing.

3a.11 The commentor requests that the Oregon Expressway/Middlefield Road intersection be added to the Transportation Impact Analysis because the SUMC Project is expected to add ten or more peak hour vehicles per lane to any movement at this intersection, which is a requirement of VTA’s TIA Guideline for Congestion Management Program (CMP) intersections. Per the comment, this intersection has been analyzed and the results are presented in Table 4-1 below:
Table 4-1
Intersection LOS Analysis of the Oregon Expressway / Middlefield Road Intersection

<table>
<thead>
<tr>
<th>Scenario</th>
<th>LOS</th>
<th>Avg Del (Sec)</th>
<th>Crit V/C</th>
<th>Avg Crit Del (sec)</th>
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</thead>
<tbody>
<tr>
<td>Existing</td>
<td>D</td>
<td>47.1</td>
<td>0.665</td>
<td>53.0</td>
</tr>
<tr>
<td>Existing + Project</td>
<td>D</td>
<td>47.1</td>
<td>0.677</td>
<td>53.0</td>
</tr>
<tr>
<td>2025 No Build</td>
<td>E</td>
<td>61.5</td>
<td>0.856</td>
<td>67.8</td>
</tr>
<tr>
<td>2025 with Project</td>
<td>E</td>
<td>62.2</td>
<td>0.867</td>
<td>68.7</td>
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<tr>
<td>Village Concept</td>
<td>E</td>
<td>62.0</td>
<td>0.864</td>
<td>68.4</td>
</tr>
<tr>
<td>#67 Oregon Expressway / Middlefield Road (CMP)</td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

PM Scenario

<table>
<thead>
<tr>
<th>Scenario</th>
<th>LOS</th>
<th>Avg Del (Sec)</th>
<th>Crit V/C</th>
<th>Avg Crit Del (sec)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
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<td>56.1</td>
<td>0.660</td>
<td>60.4</td>
</tr>
<tr>
<td>Existing + Project</td>
<td>E+</td>
<td>56.4</td>
<td>0.665</td>
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</tr>
<tr>
<td>2025 No Build</td>
<td>E-</td>
<td>77.9</td>
<td>0.992</td>
<td>90.7</td>
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<tr>
<td>2025 with Project</td>
<td>E-</td>
<td>79.5</td>
<td>1.002</td>
<td>93.3</td>
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<tr>
<td>Village Concept</td>
<td>E-</td>
<td>78.6</td>
<td>0.996</td>
<td>91.9</td>
</tr>
<tr>
<td>#67 Oregon Expressway / Middlefield Road (CMP)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: AECOM, 2011.

As shown in Table 4-1, the SUMC Project would result in a less-than-significant impact at the Oregon Expressway/Middlefield Road intersection. For all scenarios analyzed, the intersection would operate at LOS E or better and the average critical delay would not increase by four seconds or more, which is acceptable for a CMP intersection. LOS E is also considered acceptable under City of Palo Alto significance criteria.

3a.12 The commentor states that Figure 3.4-9 in the Draft EIR shows 21 percent of the regional traffic for the SUMC Project would use US 101 to and from the south and that this 21 percent occurs south of the San Antonio/Charleston interchange even though the graphic shows the 21 percent figure north of the interchange. The commentor is correct. Draft EIR Figure 3.4-9 on page 3.4-48 has been revised to show 21 percent of regional SUMC Project traffic occurs south of the San Antonio/Charleston interchange. Please refer to Staff-Initiated Change 2 for an explanation of the revisions and Appendix T of this document for the revised figure.
June 17, 2013

Steven Turner, Advanced Planning Manager
Department of Planning and Community Environment
250 Hamilton Avenue
5th Floor
Palo Alto, CA 94301

Re: Stanford University Medical Center Facilities Renewal and Replacement Project Draft Environmental Impact Report (DEIR)

Mr. Turner:

Thank you for providing the Santa Clara County Local Agency Formation Commission (LAFCO) with an opportunity to comment on the City of Palo Alto’s Draft EIR for the Stanford University Medical Center Facilities Renewal and Replacement Project. We have completed a preliminary review of the document and have identified a few areas of the document which require revisions or clarification in terms of the role of the Local Agency Formation Commission of Santa Clara (LAFCO) and the annexation process. The DEIR indicates that the project includes the annexation of an unincorporated 0.75-acre portion of the SoM area to the City of Palo Alto.

According to LAFCO’s records the 0.75 acre area is located within the City of Palo Alto's Urban Service Area boundary. Government Code Section 5657 prohibits LAFCO from reviewing a "reorganization that includes annexation to any city in Santa Clara County of unincorporated territory that is within the urban service area of the city if the reorganization is initiated by resolution of the legislative body of the city." Therefore, the City of Palo Alto will be the conducting authority for the annexation or reorganization and will determine whether or not to approve the proposed annexation/reorganization.

The DEIR (see Page 2-62) identifies “Annexation and pre-zoning of the property at the northwest corner of the Main SUMC Site, which is currently unincorporated, to the new zone.” Government Code Section 56575(a)(7) requires that the City to pre-zone the territory prior to annexing it. Furthermore, information concerning the City’s pre-zoning designation should also be included in the City’s adopted resolution approving the reorganization. Once the City approves an annexation, the pre-zoning becomes effective and must remain in place for a minimum of 2 years.

Similarly, the DEIR (see Page 2-63) incorrectly identifies LAFCO as being responsible for approving the annexation. While it is accurate that LAFCO is a Responsible Agency for this project, the City is the conducting authority for the proposed annexation because the territory in question is already located within the City’s Urban Service Area. LAFCO’s role in this instance is limited to issuing and recording a Certificate of Completion for the annexation or reorganization, providing the required documentation to the State board of equalization, and...

4.3 notifying the affected agencies and departments about the City’s approval of the annexation/reorganization.

I hope this information is helpful in clarifying certain aspects of the annexation process and in ensuring that the DEIR contains accurate information. Should you have any questions or concerns, please feel free to contact me at (650) 299-5148 or dunia.nool@co.sccgov.org. Thank you.

Sincerely,

Dunia Noel
LAFCO Analyst
4. Local Agency Formation Commission of Santa Clara County (LAFCO), Dunia Noel (letter dated June 17, 2010)

4.1 The commentor states that the 0.75-acre area that would be annexed to the City under the SUMC Project is actually in the City of Palo Alto’s Urban Service Area boundary. Because the 0.75-acre portion of the Main SUMC Site is within the City’s Urban Service Area,¹ then the City will be the conducting authority for the annexation and will determine whether or not to approve the proposed annexation. In response to Comment 4.1, Draft EIR text on page S-10, second bullet, and on page 2-23, second bullet, is revised as follows:

- Annexation to Palo Alto of a 0.75-acre property within Santa Clara County jurisdiction, but within the City’s Urban Service Area, with a Major Institution/Special Facilities land use designation to be applied to this property.

Draft EIR text on page 2-2, the fourth sentence of the first paragraph, is revised as follows:

A 0.75-acre portion of the SoM area within the Main SUMC Site is located in unincorporated Santa Clara County, but within the City’s Urban Service Area, and is proposed for annexation to the City of Palo Alto.

Draft EIR text on page 3.2-9, first bullet, is revised as follows:

- SoM proposes annexation of the 0.75-acre parcel within Santa Clara County jurisdiction but within the City’s Urban Service Area. This area would be annexed under the Major Institution/Special Facilities land use designation. The proposed FIM 1 building would be consistent with this designation.

Draft EIR text on page 3.2-31, the first sentence of the last paragraph, is revised as follows:

The SUMC Project would require the annexation of a small (approximately 0.75-acre) area, within the City’s Urban Service Area, from Santa Clara County.

4.2 The commentor states that the City is required to pre-zone territory prior to annexation. Page S-12, first paragraph, and page 2-27, first sentence, of the Draft EIR state, “Prior to annexation, the 0.75-acre area to be annexed would first need to be pre-zoned to be consistent with the rest of the Main SUMC Site.” If the City approves the annexation, the City would include the pre-zoning designation in its adopted resolution approving the annexation. The City would comply with the requirement to keep the pre-zoning in place for a minimum of two years.

In addition, Government Code Section 56757 provides that no subsequent change may be made to the Comprehensive Plan designation or zoning for the annexed territory that is not

in conformance to the pre-zoning designation for a period of two years after the completion of the annexation. However, the City Council could make a finding at a public hearing that a substantial change has occurred in circumstances that necessitate a departure from the pre-zoning designation.

4.3 The commentor defines the role of LAFCO in the annexation process. In response to Comment 4.3, Draft EIR text on page 2-63, last bullet, is revised as follows:

- Local Agency Formation Commission (LAFCO) approval of annexation, issuing and recording a Certificate of Completion for the annexation, providing the required documentation of the State Board of Equalization, and notifying the affected agencies and departments about the City’s approval of the annexation.
July 27, 2010

Mr. Steven Turner, Advance Planning Manager
Planning and Community Environment Department
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Dear Mr. Turner:

SUBJECT: San Mateo County Comments on the Stanford University Medical Center (SUMC) Facilities Renewal and Replacement Project DEIR

San Mateo County appreciates the opportunity to review the Stanford University Medical Center (SUMC) Facilities Renewal and Replacement Project DEIR, and offers the following questions and comments.

San Mateo County staff and elected officials have heard from residents of the unincorporated West Menlo Park residents concerning the heavy commute-period traffic on Alpine Road, including the difficulty of turning left onto Alpine Road from local streets, the difficulty for pedestrians and bicyclists to both cross and travel along Alpine Road, and congestion at the Alpine Road/I-280 intersection. We have also received complaints from unincorporated East Menlo Park residents concerning the heavy commute-period traffic on Santa Cruz Avenue/Sand Hill Road, as well as traffic on local streets such as Leland Avenue.

As the DEIR states, full buildout of the project is projected to result in over 10,000 additional daily trips by 2025. Based on current employee demographics, the trip distribution on San Mateo County roadways is projected to be as follows:

- About 8%, or 800, of these trips are expected to be distributed on Sand Hill Road
- About 6%, or 600, trips on Alpine Road
- Between 5 and 8%, 500-800, trips on the Alameda de las Pulgas, depending on the segment

The DEIR identifies a significant and unavoidable traffic impact on Alpine Road. Without mitigation, the projected increase would be about 514 vehicles per day. With mitigation, ADT is expected to increase from 25,120 to 25,620 (an increase of 404 vehicles). Proposed mitigation measures include:

1. Additional bicycle and pedestrian under-crossings at Caltrain tracks at Everett Avenue in Palo Alto and Middle Avenue in Menlo Park.

Please explain and/or provide more detail if necessary on how the TDM (Transportation Demand Management) program, including GO passes for Caltrain, buses, and shuttles, and other measures would realistically reduce the number of trips on Alpine Road by approximately 375. It appears likely to us that only the TDM measures would appear to have much of a potential impact on Alpine Road trips. San Mateo County is concerned that the mitigation measures proposed would not realistically result in the reductions in trips that are forecast in the DEIR.

The analysis presented raises the following specific questions, which we would like to see explored in a revised EIR:

1. Does Caltrain have sufficient parking spaces at their existing lots to handle the additional vehicles? If not, what will be the impact on street parking near those stations?

2. Does the existing transportation system service areas where Medical Center employees originate their trips? Will this project provide additional shuttle service to meet the additional demand? The DEIR referenced SamTrans bus services for 280 and 281 service areas east of El Camino Real only. We believe that employees using Alpine Road will likely not benefit from enhanced services along these bus routes.

3. If Stanford plans to extend the Margarita Shuttle to accommodate employees using Alpine Road, will additional parking be developed to accommodate them, and if so, where will it be located?

4. The existing study (in Appendix C of the DEIR) shows that about 77% of employees drive alone. Moreover, the Fehr and Peers report assumed that patient/visitor trip distribution was equal to employee trip distribution. This project adds 2,400 employees. Therefore, the remaining number of trips by patients/visitors may be more than those added by employees. Can a trip distribution for patient/visitor trips be generated based on current patient demographics?

The DEIR discusses impacts in terms of Menlo Park Standards of Significance, but not in terms of San Mateo County standards. We recommend that the report be revised to include San Mateo County Level of Service Standards (similar to the inclusion of standards for adjacent impacted agencies). Level of Service Standards (LOSS) measure roadway congestion and must be established for all State highways and principal arterials included in the San Mateo County Congestion Management Plan's (CMP) roadway system. Level of service is a qualitative description of roadway operations ranging from LOS A, or free flow conditions, to LOS F, or completely jammed conditions. The Congestion Management Program may not establish any standard below LOS F unless the LOS was F at the time that the standard was established (from San Mateo City/County Association of Government's (SCAGP) 2005 CMP).
The DEIR identifies significant impacts at two intersections in the unincorporated County:

1. Santa Cruz (Alpino)/Sand Hill (AM peak). LOS would change from D to E. Intersection improvements could mitigate this impact (NB Santa Cruz needs an additional right turn lane), but are identified as infeasible due to right-of-way acquisition requirements and cost. This intersection is under the combined jurisdictions of Menlo Park and the County of San Mateo, and improvements would require their approval. Please note that this intersection was reconstructed in 2005-2006.

2. Alpino/I-280 (NB and SB off-ramps, both AM and PM), currently unsignalized (with stop signs) could be signalized to mitigate impacts. (Existing LOS is F in SB AM/PM and C in NB PM.) The DEIR states that the project is feasible and signal warrants are already currently met. While the ramps are under CalTrans jurisdiction, this section of Alpino is also within San Mateo County jurisdiction. A joint project would need to be developed and San Mateo County would be looking to the developers to fund this project.

No intersections along Alameda de las Pulgas in West Menlo Park were analyzed. Please add intersections from Valparaiso Avenue to Sand Hill Road along the Alameda de las Pulgas into the traffic study. In addition, please add Middlefield and Marsh Roads into the analysis.

Thank you again for the opportunity to review and comment on the Stanford University Medical Center (SUMC) Facilities Renewal and Replacement Project DEIR. Please contact me at 650/363-1861 should you have any questions.

Sincerely,

Jim Eggemeyer
Community Development Director

cc: San Mateo County Board of Supervisors Members
    David Beech, San Mateo County Manager
    Jim Porter, San Mateo County Department of Public Works Director
    Joe Lo Coco, San Mateo County Department of Public Works, Deputy Director
    Arinda Heineke, Menlo Park Community Development Director
    Virginia Sheehick
    Lennie Roberts, Committee for Green Foothills
5. County of San Mateo Planning and Building Department, Jim Eggemeyer (letter dated July 27, 2010)

5.1 The commentor requests additional detail on how the proposed mitigation measures could reduce trips on Alpine Road by 375 vehicle trips per day and states that only transportation demand management (TDM) measures could account for this reduction. The 375-trip reduction is obtained from the Average Daily Trips (ADT) data (Table 3-9 and Table 4-8 of Appendix C, Transportation Impact Analysis, of the Draft EIR). The location on Alpine Road where the ADT is calculated is just south of the Junipero Serra Boulevard/Alpine-Santa Cruz (intersection #27) intersection. Volumes at this segment include traffic from Alpine Road, south of I-280, as well as from I-280. The commentor is correct that the only effective trip reduction measure along Alpine Road is the TDM program. The reduction is due to the proposed GO Pass measure that would result in less traffic from the freeway. Using the project volumes at the Alpine Road/I-280 northbound off-ramp (intersection #62), the total project volume along Alpine Road during both the AM and PM Peak Hours is 79 vehicles. Each peak hour is approximately 7 percent of the daily traffic. Therefore, the daily project traffic on Alpine Road is approximately 610. The reduction in project traffic due to implementation of the TDM program, including provision of the GO Pass, is about 100 vehicles. In addition, the GO Pass is expected to reduce existing traffic by about 275 vehicles, bringing the total reduction along Alpine Road to about 375 vehicle trips per day.

5.2 The commentor questions whether Caltrain has sufficient parking spaces to handle additional vehicles associated with the implementation of GO Passes for SUMC employees. The GO Pass program is a Caltrain initiative to increase ridership, allow employers to provide a benefit to their employees, and to eliminate drive-alone trips to their place of employment. Since the program is available to all employers, the Hospitals and the City of Palo Alto have identified this measure as a possible TDM component for the SUMC Project. Caltrain is responsible for providing the facilities necessary to accommodate any increase in ridership. Please see Master Response 1 for a discussion on the effectiveness of the GO Pass and provision of parking at Caltrain stations.

5.3 The commentor questions whether the existing transportation system serves areas where SUMC employees’ trips originate, whether the project sponsors would provide expanded service to meet the additional demand, and states employees using Alpine Road would not benefit from Mitigation Measure TR-7.2 Provide Expanded Transit Service, because none of the transit routes targeted for improvement serve the Alpine Road area. There is currently no transit service traveling along Alpine Road as noted on Draft EIR Figure 3.4-5 on page 3.4-24: Existing Transit Route Network. There is no proposal to add additional transit service to Alpine Road as part of the SUMC Project. The SUMC Project Transportation Impact Analysis considered all additional travel demand on Alpine Road to be automobile trips and assessed the project’s impacts accordingly.
5.4 The commentor asks whether Stanford plans to extend the Marguerite shuttle to accommodate new employees using Alpine Road, whether additional parking would be provided to accommodate them, and where that parking would be located. Although the Hospitals would be required to expand the frequency of service by the Marguerite shuttle to accommodate increased Caltrain ridership (Mitigation Measure TR-7.2), the purpose of this measure would be to improve the level of transit service between the SUMC Project and the Palo Alto Intermodal Transit Station (PAITS). Stanford does not propose to expand Marguerite service onto Alpine Road and does not propose a park–and–ride lot on Alpine Road. Please refer to Staff-Initiated Change 1 for the revised TR-7.2.

5.5 The commentor requests that a trip distribution pattern be established for patients and visitors. Following standard methodologies, the Transportation Impact Analysis (Appendix C of the Draft EIR) focused on the AM and PM Peak Hours (the periods between 7:00 a.m. and 9:00 p.m. and 4:00 p.m. and 6:00 p.m., respectively). During these times, the majority of travel is by employees. However, the trip generation rates also include patient and visitor trips. Moreover, the trip distribution patterns of patients and visitors during the AM and PM Peak Hours would be similar to employees. A separate analysis of patient and visitor travel patterns is not expected to yield results different from that contained in the Transportation Impact Analysis.

5.6 The commentor requests that San Mateo County standards of significance be included in the Transportation Impact Analysis. The San Mateo County Congestion Management Program (CMP) significance criteria state that a traffic impact would be considered significant if the project would:

- Cause a signalized CMP intersection to operate at a LOS that violates the standard adopted in the current CMP;
- Result in a signalized CMP intersection to operate at a LOS that violates the standard adopted in the current CMP and the proposed project increases average control delay at the intersection by four seconds or more under the cumulative conditions;
- Add any additional traffic to a signalized CMP intersection that is currently not in compliance with its adopted LOS standard as established in the CMP;
- Cause a freeway segment to operate at a LOS that violates the standard adopted in the current CMP;
- Result in a freeway segment to operate at a LOS that violates the standard adopted in the current CMP and the proposed project increases the V/C ratio by one percent under the cumulative conditions; or
- Result in one percent increase in the V/C ratio if the freeway segment is currently not in compliance with the adopted LOS standard.
The San Mateo County CMP intersections were analyzed in the Draft EIR using City of Menlo Park criteria. The analysis determined that the Bayfront Expressway/Willow Road intersection and the Bayfront Expressway/University Avenue intersection would be considered significantly impacted under these criteria. No freeway or roadway segments are considered significantly impacted under these criteria and no new impacts have been identified.

5.7 The commentor notes that the intersection of Santa Cruz Avenue/Sand Hill Road would experience a change in level of service from LOS D to LOS E during the AM Peak Hour and notes that implementation of intersection modifications would require the approval and concurrence of both Menlo Park and San Mateo County. The Transportation Impact Analysis determined the type of physical improvements that would be necessary at every intersection significantly impacted by the SUMC Project. The Transportation Impact Analysis further analyzed other potential mitigation measures in advance of physical roadway improvements; including traffic-adaptive signal technology, transportation demand management strategies, and bicycle and pedestrian facility improvements. The combined implementation of these other strategies would mitigate the impact to the Santa Cruz Avenue/Sand Hill Road intersection to a less-than-significant level, and physical roadway improvements at this intersection would not be required.

5.8 The commentor states that signalization of the Alpine Road/I-280 NB Off-Ramp intersection and the Alpine Road/I-280 SB Off-Ramp intersection would reduce project impacts and that the SUMC Project should help fund this improvement. Draft EIR page 3.4-16, Table 3.4-6 states that these intersections operate at unsatisfactory LOS under existing conditions. Because of the deficient traffic operations that currently occur at these intersections, the SUMC Project would result in a significant traffic impact. However, prior to making any physical improvements at impacted intersections, the Draft EIR considers mitigation measures such as expanded TDM measures, traffic-adaptive signal technology, and bicycle and pedestrian improvements. Implementation of these measures would reduce the SUMC Project impacts to a less-than-significant level and no physical improvements, such as signalization, would be necessary at the Alpine Road/I-280 SB Off-Ramp intersection and at the Alpine Road/I-280 NB Off-Ramp intersection.

5.9 The commentor requests that intersections along Alameda de las Pulgas in West Menlo Park and the Middlefield Road/Marsh Road intersection be added to the Transportation Impact Analysis. The parameters of the Transportation Impact Analysis were reviewed with Menlo Park engineering staff and the scope of the Transportation Impact Analysis study area is considered adequate to address the likely impacts of the SUMC Project. The Transportation Impact Analysis included the analysis of 66 intersections, eight residential roadway segments, and eight roadway segments along major corridors within and surrounding Menlo Park. However per the comment, the Middlefield Road/Marsh Road intersection has been added to the analysis. On the other hand, based on the Menlo Park
significance criteria, the SUMC Project is unlikely to have an impact on Alameda de las Pulgas, classified as minor arterial street within the City of Menlo Park, as the project ADT is expected to be less than 100 vehicles. As such, Alameda de las Pulgas has not been included within the Study Area.

As shown in Table 4-2 below, the Transportation Impact Analysis determined that the Middlefield Road/Marsh Road intersection would operate within an acceptable LOS D or better under all scenarios analyzed.

<table>
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<th>Crit V/C</th>
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*Source: AECOM, 2011.*
Dear Mr. Turner,

San Mateo County had provided written comments on the Stanford University Medical Center DEIR on July 27. I have subsequently received an additional comment (below) from our County Manager, which I am forwarding to you for your consideration. Please let me know if you have any questions. Thank you.

Sincerely,

Matt Seubert
San Mateo County Planning Department

>>> David Boesch 8/2/2010 9:00 AM >>>

Jim-

The letter on the Stanford Medical Center expansion project is well done. If serious discussions ensue regarding the Alpine Road/I-280 intersection and its potential signalization, I suggest that the experts also look at the potential alternative of a roundabout. There are a number of new designs and fairly recent examples where their performance surpasses standard traffic signal technology.

Thanks,

David
6. County of San Mateo County Manager, David Boesch (letter dated August, 2010)

6.1 The commentor states that if serious discussions ensue regarding the signalization of the Alpine Road/I-280 NB Off-Ramp intersection and the Alpine Road/I-280 SB Off-Ramp intersection, that a roundabout may be a viable alternative to a signal, because new designs of roundabouts surpass the performance of standard traffic signal technology. A roundabout, if properly designed, could provide more capacity than a standard traffic signal. The trade-off would include the availability of right-of-way as roundabouts generally require more area. The final decision with respect to the most appropriate traffic control at this intersection would be made by both Caltrans and San Mateo County. However, with implementation of the other mitigation measures identified in the Draft EIR, the SUMC Project would not have a significant impact at this intersection and would not be required to help fund a traffic signal or roundabout.

Signal warrants are currently met at the Alpine Road/I-280 NB Off-Ramp intersection and the Alpine Road/I-280 SB Off-Ramp intersection. Because of the deficient traffic operations that currently occur at this intersection, the SUMC Project would cause a significant traffic impact. However, prior to adopting mitigation measures that include physical improvements at impacted intersections, the Draft EIR considers expanded transportation demand management (TDM) measures, traffic-adaptive signal technology, and bicycle and pedestrian improvements. Implementation of these measures would reduce the SUMC Project impacts to a less-than-significant level and no physical improvements, such as signalization or a roundabout, would be necessary at the Alpine Road/I-280 NB Off-Ramp intersection or the Alpine Road/I-280 SB Off-Ramp intersection.
July 26, 2010

RE: Stanford University Medical Center Facilities Renewal and Replacement Project
Draft Environmental Impact Report ("EIR")

Dear Mr. Steven Turner:

On behalf of the City of East Palo Alto, the Honorable Mayor David Woods and members of the East Palo Alto City Council, the Planning Division gratefully thanks Stanford University Medical Center and the City of East Palo Alto for delivering a televised presentation on the Draft Environmental Impact Statement on the Stanford University Medical Center Facilities Renewal and Replacement Project. The City especially wishes to express their continued appreciation to the Stanford University Medical Center and the Lucile Packard Children’s Hospital for the ongoing support provided by any of the city’s non-profits dedicated to improving the health of local residents.

These formal comments to the draft Environmental Impact Report entitled “Stanford University Medical Center Facilities Renewal and Replacement - SCH # 2007082136,” prepared by PBS & J and their various sub consultants, include the collective response of the various agencies of the City of East Palo Alto and the City Council.

Inquiries should be directed to the Planning Division.

Yours truly,

Brent Bafer,
CEQA Reviewer, AICP, CFM

Brett Tarr,
Senior Planner, AICP

July 27, 2010

LEAD AGENCY: City of Palo Alto
PROJECT APPLICANT: Stanford University Medical Center
RESPONSIBLE AGENCY: City of East Palo Alto
REVIEWING AGENCY: City of East Palo Alto
CONTACT: Brent A. Butler, Planning Director
PLANNING DIVISION: 1960 Tate Street, East Palo Alto, California 94303

SUBJECT: Comments on the Stanford University Medical Center Facilities Renewal and Replacement
SCH # 2007082130

These comments are arranged in the order by which the appendices were drafted. With the exception of the proposed mitigations listed in the summary Section III, the comments refer specifically to the technical appendices, and the accompanying Draft EIR.
APPENDIX A

No comment.
APPENDIX B

Comments on the Cumulative Projects within Palo Alto

The City of East Palo Alto acknowledges the list of projects in the pipeline, and notes that many of the sixty (60) projects identified employ workers identified by the North American Industrial Classification System in wage earners that do not earn enough to afford rental or for-purchase housing in Palo Alto. For those resident housing units contained in the list, it is also anticipated that increased demand for goods and services required for hiring of new workers in Palo Alto, some of whom cannot afford housing within the city boundaries.

Section 7.1
Palo Alto is the number one employment center for East Palo Alto residents. Mountain View is the second, as documented in the Recreation and Parks 2006 Specific Plan: Market and Economic Analysis prepared by Bay Area Economics, dated February 2, 2010 (see Table H Community Patterns). A failure to mitigate both residential and non-residential development will result in increased affordable housing demand. If the construction of affordable housing within the City of Palo Alto does not meet demand, there would likely be increased demand for affordable housing in East Palo Alto. This increased demand would force displacement of existing East Palo Alto families as employees seeking housing close to work look for low-cost housing in East Palo Alto. Indeed, the City of East Palo Alto may provide housing for those ranges of income not accommodated by the sixty projects in Palo Alto’s pipeline.

Section 7.2
Mobility Issues

Producing housing that matches wages may improve air quality by those who no longer need to drive to qualify for housing that is within their means. Efforts to reduce these impacts through improved non-motorized connections to East Palo Alto in accordance with SOL and SB 375, and affordable housing production in Palo Alto commensurate with the new housing demand would be welcome.

APPENDIX C

Part 1 Comments on the Transportation

AIR QUALITY IMPACTS

CEQA Guidelines section 15364, subdivision (b) mandates that both primary (direct) and "reasonably foreseeable" secondary (indirect) consequences be considered in determining the significance of a project's environmental effect. Concerns expressed by the legislative body of the City, including the Honorable Mayor David Woods and Councilmember Karen Adkins, echoed by the City's Planning Division and Public Works Department, suggest that the Draft Environmental Impact Report for the Stanford University Medical Center Facilities Renewal and Replacement ("SUMC") does not consider reasonably foreseeable secondary (indirect) consequences, such as transportation impacts on local air quality and mobility in the City of East Palo Alto.

The Draft EIR omits specific relevant information or does not:

- While the EIR approximates that 26% of the SUMC’s 10,0611 daily trips will use the highways within the City of East Palo2 or access Hwy 101 through the local arterial, such as University and West Bayshore, in addition to trip contributions to air pollution outside of the immediate project vicinity, it appears to have been investigated in any of the report’s appendices, or accompanying Draft EIR.
- The EIR implies that since there is little or no change in the intersection Level of Service (LOS) in the City of East Palo Alto that there is no impact on public health.

The City disagrees. To the contrary, based on many reports on congestion and traffic (1, 2, 3, 9, 23, 34, 25, 37, 59, 60, 71, 92, 94, 34, 41, 45, 47, 51, 52, 54, 55, 70, 75, 76, 79, 83), local and regional hearings, and specific findings by the Public Works Department for the City of East Palo Alto, and C/OG of San Mateo, it is anticipated that the SUMC may increase the negative health outcomes of East Palo Alto residents, from adequately mitigated.

ENVIRONMENTAL JUSTICE

The City of East Palo Alto is an environmental justice community based on local household characteristics approximately 79 percent of East Palo Alto households have incomes defined as low-income, and 75% of the City is Latino and African-American. Moreover, the City of East Palo Alto has been disproportionately burdened by regional traffic and hazardous air, soil and ground water contaminants leading to the City's designations as a brownfield community. The depth and breadth of this burden and the consistency with which the community has borne unwanted land uses is clearly expressed in the East Palo Alto documentary entitled Dreams of Our City.

1. Table 3-2 in AECOM’s March 2010 Traffic Impact Analysis (TIA). 26% of trips are directly generated, where East Palo Alto is located (see Appendix C, Table and Figure).
3. 20% of trips are distributed in the direction eastward, where East Palo Alto is located (see Appendix C, Table and Figure).
POTENTIAL FOR INCREASED CANCER INCIDENCE

Congestion related impacts of the Stanford University Medical Center ("SUMC") could be exacerbated at peak hour, especially PM peak hour when the "heat island effect" is greatest and the traffic counts are the highest. Toxic Air Contaminant (TAC) increases in the afternoon could be especially significant since this coincides with after school activities, when children are active and respiration rates are at higher levels, thereby creating an exposure pathway that could be particularly conducive for increased cancer incidence. With sparsely planted trees, the urban canopy to mitigate air impacts is virtually non-existent. With among the lowest median age of any city in the Bay Area (27 years of age in East Palo Alto), versus 40 years for San Mateo County, the potential for significant adverse health impacts by these sensitive receptors is very real, and unfortunately documented by statistics.

These impacts are magnified by ramp metering and cut-through traffic, which is a roadblock to exercise such as walking and bicycling. The proximity of the Caltrain ramp and highways to dense housing allows TACs, especially from these trucks accessing the SUMC project area to impact open space and schools. With ramp metering, interaction levels of service at the SUMC's studied street segment that road capacity is limited. As trucks are known contributors of PM2.5, which correlates with increased cancer incidence, analysis of these impacts in the Draft EIR is necessary but entirely omitted. Unfortunately, there is no application of the adopted truck routes of the adjacent municipalities will be used, there is virtually no spatial data or discussion about the proximity of the schools and housing to these approved truck routes and roads, which must carry roughly 26% of all of the SUMC operational, not to mention construction-related, trips.

Cut-through traffic has been widely discussed by the City of East Palo Alto's advisory board, the 2020 Peninsula Study, and the OCO's Willow and University Corridor Project, which is currently underway. A material emission, which calls into question the completeness of the EIR, is how the cut through traffic, long queueing along University during peak hour, and cogged residential roads impact health in an environmental justice community with some of the smallest ratios of open space per 1,000 persons in the region.

DURATION OF CONCERN

Since speculation should be excluded from the EIR, the number of years that higher levels of TACs would be anticipated is irrelevant because of uncertainty with regard to the impact of the Corporate Average Fuel Economy (CAFE). For this reason, the EIR should mitigate increases in TACs until local monitoring documents that TACs are no longer a concern.

While the CAFE program, originally adopted by Congress in 1975, would argue that local air quality would improve over time, several economists have noted otherwise. The CAFE program

7.7 Contin'
ii. ADVISORY BODIES - Numerous stakeholders complained of cut-through traffic at meetings of the Planning Commission, Public Works and Transportation Commission and the Areas of Impact listed above correlate to these findings;

iii. AIR QUALITY - While the Bay Area Air Quality Management District identifies the Bay Area as an "Impacted Area", the American Lung Association has rated the Bay Area as having an "Impacted" area based on air quality. By comparison, areas of San Mateo County have been identified as having an "Impacted" area based on air quality. This is due to the high concentration of vehicles in the area, which may result in increased air pollution. The findings are based on a peer-reviewed study, and the combination of environmental factors suggests that increased air pollution in the local area may be due to increased traffic congestion and increased air pollution in the area and given that nearly 1,000 cars (26 percent of 3,000 cars) will release TACs, much of this during the peak hour, to the City's roadway network already at capacity. Based on the foregoing, the City reasonably anticipates localized impacts;

iv. OBESITY - The San Mateo County Department of Public Health identifies obesity as an important issue. In local youth based on an analysis of schools (see Health Impact Area 2 for a discussion of this topic)

v. MORBIDITY - The California Department of Public Health's Office of Statewide Health Planning and Development identifies that residents of the City of East Palo Alto have significantly shorter life expectancy, which could be partially attributable to a failure to identify, quantify, and mitigate health impacts of major projects, and

vi. CONGESTION - Given that the existing conditions in the EIR illustrate that many of East Palo Alto's intersection segments have a LOS of D or worse, it is reasonable to assume that a significant percentage of the City's traffic will spill over onto local roads that impact the local community. For example, congestion on Tully Road causes traffic to divert into East Palo Alto neighborhoods (e.g., Pulgas and Clare Avenue) and congestion on University Avenue diverts traffic to Woodside Road (see "Tunnels" Corridor Gateway Study Figure 3 - Traffic Issues Within Study Area), which has created microclimates loaded with TACs based on the findings outlined under vii. below, and

vii. SENSITIVE RECEPTORS - Given the proximity of these congested areas to the schools, recreational areas, and multifamily apartment buildings that house possibly as many as 1,200 people as well as 1,200 school children, the excessive and increased cancer risk could be considerable, and is noted in the discussion.

7.8 Cont'd

7.9

viii. MICROCLIMATES POTENTIAL FOR TAC LOADING -

a. TREES - ortho-rectified GIS maps document that the urban canopy (the density of trees available to absorb, mitigate, or reduce TAC impacts) would be minimal, therefore exacerbating impacts.

b. ISLAND EFFECT - local data related to roadway design, and ruralized concept suggest that darker pavement increases the localized impact of the heat island effect and potentially exacerbates TAC loading.

c. GEOLOGY - Dispersion models identify that terrain in a factor in that TACs may disperse to the low-lying areas that have a longer travel time. The Flood Insurance Rate Map identifies that almost 40 percent of the City is in the special flood hazard area, meaning that the heavy air pollutants have a greater opportunity to disperse in low-lying areas where sensitive receptors are located.

MODELING

Findings by the National Institutes of Statistical Sciences identify three core considerations specific to transportation modeling that raise serious questions about the analysis in the Draft EIR, or lack thereof, including:

1. Designing and collecting field data is critical, difficult,... (b) Relevance in the "simulated" world is not necessarily robust in reality. . . . (c) The use of visualization is important because it can quickly provide insight into difficulties and also assist in uncovering sources of trouble.

First, no relevant data specific to the City of East Palo Alto's health concerns appear to have been collected for the purpose of modeling area quality impacts. Concerns related to this encouraged City staff to meet with the California Environmental Engineering Board Manager, District Engineer, and California staff in Oakland, California on July 23, 2010 for the purpose of gathering the "best available" data related to modeling techniques. Based on this conversation, the City reviewed a technical report and also became aware that CALINE 4, which is used in the Draft EIR appendix would likely underestimate a host of TACs and that this model has not been used by Caltrans in almost a decade. Furthermore, when it was last used, it has been exclusively linked to carbon monoxide (CO). Second, no notation appears in the appendix to support a finding that the simulator's robustness mimics that of reality, since investigations related to the impacts of spillover traffic is omitted entirely from the Draft. Thirdly, congestion related delays at intersections not investigated in the Draft EIR, and which were referred to in public meetings by Public Works and Transportation Commissioner Tom Tao, PE, casus to the discussed area rate at the University Avenue overpass all of the way up and over the freeway. Visualization of these
7.11

POTENTIAL FOR AN UNDERESTIMATION

The Stanford Medical Center Pre-application Traffic and Parking Study map identifies estimated trip distribution based on employee residences, and extrapolates from this base sample to estimated total trips as highlighted below.

"The trip distribution, being based on employee residences, does not directly reflect the origins/destinations of patient trips. However, it is a good basis for distributing peak hour trips, because (1) employee commutes make up the largest component of peak hour travel for medical centers, and (2) the geographic distribution of patients served by the medical center is similar to housing patterns within the communities served by the medical center, which is also correlated with the employee population."

While the City agrees with the methodology, the decision expressly stated in Appendix F, "not to use a multiplier," and therefore to exclude some of the indirect and cumulative impacts from the study creates a potential for an underestimation of trip generation.1

7.12

APPENDIX B

Part 2
Comments on the Transportation

MOBILITY IMPACTS

Comments Related to Non-motorized Transit and Public Transportation

The SUMC project could inhibit the use of public streets for bicycling or walking, as increased congestion on the major pathways to recreation, schools, and neighborhood services would be impacted by higher traffic counts, reduced air quality, and a perception that the streets are congested and unsafe for non-motorized mobility. A careful review of the traffic counts and accident data for the City obtained by the Statewide Integrated Telecommunications System (SWITS) suggest that these are very real health impacts, and that the public perception of these impacts might exacerbate the explosion of obesity currently underway within the City of East Palo Alto.

IMPACT CHAIN

The Stanford University Medical Center project will create 10,061 trips, which will lead to more spill-over cut-through traffic as 20% of the trips distributed to the east access SUMC through two major routes that divide the City. Mobility impacts related to traffic is abundant in the literature, as are the associated health effects. The SUMC project is expected to impact all of the categories identified below by reducing physical activity, connectivity, including:

Studies show that:
1) children who spend fewer calories through physical activity are more likely to be obese than other children (4);
2) the most effective programs to reduce obesity carried on by academic centers combine diet, behavior, activity, and parental involvement (15);
3) that a disproportionate share of bicycling occurs on well-connected neighborhood streets with a network of bicycle specific infrastructure to encourage more bicycle among adults (28);
4) having recreational space within one kilometer of home was the strongest urban form predictor of walking (39);
5) increase in the prevalence of obesity appears to be attributable to environmental conditions that implicitly discourage physical activity while explicitly encouraging consumption of greater quantities of energy-dense, low nutrient foods (40).

Study number four is significant since nearly 42% of the City of East Palo Alto has access to recreation by way of a four-foot wide path on the University bridge overpass leading to one of the City's highest collision rates. Given that this intersection would have to accommodate more traffic as a result of this project, mitigation is warranted. Study number five highlights the City's efforts to improve local health through access to healthy foods available in new stores such as...
M. Pueblo, could be offset by SUTC project traffic because it is a barrier that discourages physical activity.

**North/South Barrier for Pedestrian and Bicycle Mobility**

University Avenue, which divides the City into two distinct halves, has been the focus of the Willow University Corridor Study for the purpose of decreasing delays along the arterial. At the City of East Palo Alto's Public Works and Transportation Commission during meetings in the spring and summer of 2010, the advisory body members expressed concern that more traffic would lead to lower real impacts, and questioned whether reducing the four existing lanes on University Avenue to two could accomplish a reduction in pass-through traffic. These comments were in response to concerns about speed and cut-through traffic.

**East/West Barrier for Pedestrian and Bicycle Mobility**

Highway 101 divides the densely populated western part of the City of East Palo Alto, which is significant because more than 70% of the City is zoned for single family, low density residential uses (1-7 dwelling units per acre (du/a)). However, the density of the western portion of the City, west of US 101, ranges as high as 28-34 du/a, where several apartment/condo buildings are located.

**NOTEWORTHY OMISSIONS**

Review of the Transportation Appendix II identifies that East Palo Alto's Comprehensive Plan thresholds of significance and shuttle service are entirely omitted. The East Palo Alto Comprehensive Plan ("Plan") truck routing and non-motorized transportation is largely referenced in the Appendix, which is relevant given the City's Plan implements 2B 32 and SB 395 through the bikeways/pedestrian projects highlighted below.

```
... two major bikeway/pedestrian projects ... the University Avenue Bicycle Lanes, and the Bayfront Bicycle Trail. The University Avenue Bicycle Lanes Project involves the design and construction of pavement rehabilitation, street lighting, striping, and signage to provide bicycle lanes on University Avenue from Donohue Street to the north City limit. This project will be constructed as part of the University Avenue Reconstruction Project to create a regional bikeway that connects bicycle lanes in the cities of East Palo Alto, Palo Alto, and Menlo Park." See East Palo Alto Circulation Element, December 26, 1999)
```

**INITIAL STUDY — Aspire Public School**

A review of the two initial studies by the City of East Palo Alto prepared for the purpose of assessing schools documents that non-motorized mobility, such as walking and bicycling riding is less than would be typically expected. In fact, several issues are noteworthy, including:

- the comments from local parents to the Public Work and Transportation Commission and the City Council expressing concern about speeding and cut through traffic,
- the Aspire survey included in the Initial Study which identifies a lower than average rate of walking and bicycling riding in the local area, and
- the overlap of areas with locations where cut-through traffic has been identified.

These taken together suggest a finding that congestion on the residential streets may be a contributor to the city's declining non-motorized mobility and therefore would be a factor in the city's explosion of obesity. Data collected by the National Nonprofit known as Safe Routes to School document that traffic density is a factor in whether children walk or ride their bicycles to school.

**FINDING 3: Analysis should incorporate the 'best available science' and incorporate local planning, thresholds and existing conditions since public health impacts should be identified in advance, so that an appropriate mitigation can be incorporated in the Final EIR. Based on the foregoing, it is anticipated that contribution to the City of East Palo Alto Shuttle service, or expansion of the existing service, might reduce impacts.
Appendix D - Analysis with Provision of Remote Parking Lots

The City of East Palo Alto accepts the findings in the appendix without comment.

Appendix E - Calculation of Vehicle Miles Traveled

The City of East Palo Alto accepts the findings in the appendix without comment.
APPENDIX - F Health Risk Assessment

The EIR section on the health risk assessment should address the air pollutant loading at intersections in the City of East Palo Alto, in addition to the operational and construction related issues identified. At the very least, the EIR should identify the areas where health issues are significant.

A review of the assessment indicates that areas already impacted by ODS of B or worse, would experience increased congestion, and therefore increased pollutant loading as a result of the incomplete combustion. Since these areas correspond to locations where sensitive receptors would be located, the mission is significant. For example, the Ravenswood School District which serves both Menlo Park’s Belle Haven neighborhood and the City of East Palo Alto documents that a large percentage of the 5,000 school children in the district near the interchange of impacts. Possibly as much as 60% of the City of East Palo Alto population resides in the Woodland and Willow neighborhoods, which are west of Hwy 101. No quantification of the potential pollutant loading appears in the report.

QUANTIFY THE HEALTH RISK

The final EIR should have some quantification of the health risks associated with hazardous air pollutants, such as TACs, particulate matter less than 10 micrometers in diameter, despite particulate matter (PM-10) for those populations near the interchange, which will be burdened with the largest volume of increased traffic, such as East Palo Alto’s University and Hwy 101 interchange. The EIR should also identify appropriate mitigation for these impacts.

Referring to the November 14, 2007 memorandum from Ellen Polling, Federal Peers with the subject: Recommendation for SFO Traffic Distribution, the area identified with the largest number of trips is east of the medical center in Table 3, since 28% of the trip distribution is the largest number of trips in any category and those go from Palo Alto to the East Donahue/Bridge/Mead. Given the disproportionate percentage of the population that would qualify as sensitive receptors in East Palo Alto as it has the most youthful population in the area (see Housing Element adapted June 15, 2010, median age of East Palo Alto residents is 27 years, versus 46 for San Mateo County), mitigations must be included in the Final EIR.

7.20

7.21

The City of East Palo Alto acknowledges the report, and recognizes a material omission by including health impacts.
Appendix II – Climate Change

The City of East Palo Alto acknowledges the appendix on climate change, and recognizes a material omission by not including health impacts, especially those related to truck routing through the City, as TACs from trucks are harmful for adults in general, and sensitive receptors in particular. Moreover, traffic-related air pollution is associated with cardiovascular morbidity and mortality (2); furthermore, the American Lung Association notes that achieving cleaner environments requires intervention based on scientific data. No data relevant to the concerns of an environmental justice-sensitive community are available in this study (3).
Appendix J — ARG Hoover Pavilion

The City of East Palo Alto acknowledges the appendix, and has no comment.
It is quite possible that some of the employees seeking affordable housing will actually cross the boundary line between Santa Clara County and San Mateo County and seek affordable housing in East Palo Alto, as well as other cities in San Mateo County.

Appendices L through R

The City of East Palo Alto acknowledges these appendices, and has no comment.
SECTION III

Recommended Monitoring Protocol and Mitigation Measures
MITIGATION MEASURES

Consideration of amending the mitigation measures as follows is suggested based on concerns related to air quality and mobility impacts associated with the project. Furthermore, SUMC should facilitate ongoing consultation with City staff and the legislative body for the purpose of reducing negative health outcomes not only for sensitive receptors, but for all City residents within the City’s boundaries.

MITIGATION AREA 4

TR 6.2 - Transit Service Expansion

The Lead Agency should provide expanded transit service, recognizing the omission of the City of East Palo Alto free shuttle, whose ridership base of nearly 6,000 persons is one of the largest for a city of its size.

MITIGATION AREA 6

AQ2 - CO and TAC Impact Monitoring Program

The Lead Agency should add a monitoring protocol that evaluates the impacts of increased congestion on EPA’s and the surrounding roadways. This is especially significant since the City’s recently adopted Housing Element identifies that the median age is one of the lowest in the Bay Area, and also that TACs related to automobiles and, especially, trucks, may be exacerbated by congestion and ramp metering that tends to occur in proximate vicinity to, respectively, the City’s senior citizen center and the largest cluster of high density housing that includes youth, both identified sensitive receptor populations.
### Section IV

**References**

<table>
<thead>
<tr>
<th>Source</th>
<th>Abstract (if available)</th>
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<tbody>
<tr>
<td><strong>1</strong></td>
<td>Our central paradigm for urban ecology is that cities are emergent phenomena of local socio-economic interactions among socio-economic and biophysical systems. These complex interactions give rise to distinctive cities and to distinctive socio-economic forcing functions. Separately, both the natural and the social sciences have adapted complex system theory to study emergent phenomena, but attempts to integrate these disciplines generally study human and ecological processes as separate phenomena. Here we argue that the natural and social sciences remain within their separate domains, they cannot explain how human-dominated ecosystems emerge from intersections between humans and ecological processes. We propose an integrated framework to test formal hypotheses about how human-dominated ecosystems evolve from those intersections.</td>
</tr>
<tr>
<td><strong>2</strong></td>
<td>Background: Traffic-related air pollution is consistently associated with cardiovascular morbidity and mortality. Recent human and animal studies suggest that exposure to air pollutants affects vascular function. Diesel exhaust (DE) is a major source of traffic-related air pollution. Objectives: Our goal was to study the effects of short-term exposure to DE on vascular reactivity and on mediators of vascular tone. Methods: In a double-blind, crossover, controlled exposure study, 27 adult volunteers (10 healthy and 17 with metabolic syndrome) were exposed in random order to filtered air (FA) and each of two levels of diluted DE (100 or 200 Sma (μg g⁻¹ (Nm⁻¹)) of fine particulate matter) in 2-hr sessions. Before and after each exposure, we measured the brachial artery diameter (DAM) by iBr mode ultrasonography and collected blood samples for endothelin-1 (ET-1).</td>
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Over the past three decades, an array of legislation with attendant regulations has been implemented to enhance the quality of the environment and thereby improve the public's health. Despite the many beneficial changes that have followed, there remain a disproportionate number of populations with harmful environmental exposures, particularly air pollution, for certain populations. These populations are often in urban settings, have low socioeconomic status, and include a disproportionate number of children. The disparities between racial/ethnic minority and/or low-income populations in cities and the general population in terms of environmental exposure and related health risks have prompted the "environmental justice" movement, which strives to create cleaner environments for the most polluted communities. Achieving cleaner environments will require interventions based on scientific data specific to the populations at risk; however, research in this area has been relatively limited. To assess the current scientific information on urban air pollution.


The increase in childhood obesity over the past several decades, together with the associated health problems and costs, is raising grave concern among health care professionals, policy experts, children's advocates, and parents. Patricia Anderson and Kristin Brohan document trends in children's obesity and examine the possible underlying causes of the obesity epidemic. They begin by reviewing research on energy intake, energy expenditure, and "energy balance," noting that children who eat more "empty calories" and expend fewer calories through physical activity are more likely to become fat children. Next they ask what has changed in children's environment over the past three decades to upset the energy balance equation. In particular, they examine changes in the food market, in the built environment, in schools, and child care settings, and in the role of parents' paying attention to the timing of these changes. Among the changes that affect children's energy intake are the increasing availability of energy-dense, high-calorie foods and drinks through schools, restaurants, and convenience stores.
family, particularly an increase in dual-career or single-parent working families, may also have increased demand for food away from home or pre-prepared foods. A host of factors have also contributed to reductions in energy expenditure. In particular, children today seem less likely to walk to school and be traveling more in cars than they were decades ago, perhaps because of changes in the built environment. Finally, children spend more time viewing television and using computers. Anderson and Batcher find no one factor that has led to increases in children's obesity. Rather, many complementary changes have simultaneously increased children's energy intake and decreased their energy expenditure. The challenge in formulating policies to address children's obesity is to learn how best to change the environment that affects children's energy balance.

Traffic safety in the UK is one of the increasing number of areas where central government sets targets based on 'outcome-focused' performance indicators (PIs). Judgments about such PIs are often based solely on rankings of raw data and simple league tables dominate centrally published analysis. There is a considerable statistical literature examining public health and education issues which has tended to use the generalized linear model (GLM) to address variability in the data when drawing inferences about relative performance from headline PIs. This methodology could obviously be applied in contexts such as traffic safety. However, when such models are applied to the fairly crude data sets that are currently available, the interval estimates generated e.g. in respect of rankings, are often too broad to allow much real differentiation between the traffic safety performance of the units that are being considered. Such results sit uncomfortably with the ethos of 'performance management' and raise the question of whether the inference from indicative data about relative performance can be improved in some way. Motivated by consideration of a set of nine road safety performance indicators measured on English local authorities in the year 2000, the paper considers methods to strengthen the weak inference that is obtained from GLMMs of individual indicators by simultaneously, multivariate modeling of a range of related indicators. The correlation structure between indicators is used to reduce the uncertainty that is associated with rankings of any one of the individual indicators. The results demonstrate that credible intervals can be substantially narrowed by the use of the multivariate GLMM approach and that multivariate modeling of multiple PIs may therefore have considerable potential for introducing more robust and realistic assessments of differential performance in some contexts.

**Bay Area Air Quality Management District, California Environmental Quality Act (CEQA) Quality Guidelines, Bay Area Air Quality Management District, December 2008**

http://www.bayareaair.org/ceqaguidelines/ceqaguidelines.pdf


yachts in a large marina.}

This article develops and assesses novel
tools to predict respiratory and other mortality
and morbidity following episodes of acute
air pollution. Environmental Health
Perspectives 119 (June 2011): 385-394.

10

Brek, Richard A., Peter Bickel,
Katherine Campbell, Robert Fowell, Stacie
Keller McNally, Elizabeth Kelly, Rodman
Lian, Byangkuu Park, Alan Pearson,
Nagal Roopesh, Jerome Stacks, and
Fredene Schenck. “Workshop on
Statistical Approaches for the Evaluation
of Computer Models” Statistical

As decision- and policy-makers come to rely
increasingly on estimations and simulations
produced by computerized models of the
world, in areas as diverse as climate prediction,
transportation planning, economic policy and
civil engineering, there is the need for objective
evaluation of the accuracy and utility of such
models. This workshop summarizes a two-day
workshop that took place in Santa Fe, New Mexico
in December 1999, whose focus was the
evaluation of complex computer models.

Approximately half of the workshop was taken
up with formal presentations of four computer
models by their creators, each paired with an
initial assessment by a statistician. These
presentations are included in short 10-page
sections. There were additional discussions
developed by the workshop participants,
especially from a statistical point of view.

11

Bhata, Rajiv and Amran Warsham.
“Integrating Human Health into
Environmental Impact Assessment: An
Unfulfilled Opportunity for Environmental
Health and Justice” Environmental Health
Perspectives 116, no. 5 (August 2008):

Objective: The National
Environmental Policy Act and related state
laws require many public agencies to analyze
and disclose potentially significant
environmental effects of agency actions,
including effects on human health. In this paper
we review the purpose and procedures of

The study of the Lethal London Fog of 1952: Novel Indicators of Acute
and Chronic Consequences of Acute Exposure to Air Pollution.”
Environmental Health Perspectives 119 (June 2011): 385-394.
environmental impact assessment (EIA),
existing regulatory requirements for health
effects analysis, and potential barriers to and
opportunities for improving integration of
human health concerns within the EIA process.
Data sources: We use statutes, regulations,
guidelines, court opinions, and empirical
research on EIA along with recent case
elements of integrated health impact
assessment (HIA/EIA) at both the state and
federal level. Data synthesis: We extract
lessons and recommendations for integrated
HIA/EIA practices from both existing practices
as well as case studies. Conclusions: The case
studies demonstrate the adequacy, scope, and
powers of existing statutory requirements for
health analysis within EIA. The following
supports the success of integrated HIA/EIA:
a proponent recognizing HIA is an available
regulatory strategy for public health; the
involvement of public health institutions;
and complementary objectives among community
stakeholders and health practitioners. We
recommend greater collaboration among
institutions responsible for EIA, public health
institutions, and affected stakeholders along
with guidance, resources, and training for
integrated HIA/EIA practice.

12
The British Medical Journal.
“Traffic in Human Hair” The British
Medical Journal 2, no. 2592 (September
1911): 611.

13
Bennett, Richard, Ecija Mia,
Michael Jarrett, Mark S. Goldberg, Sabit
Cakanah, C. Arden Pope, III and Daniel
Kreoski. “The Spatial Association between
Community Air Pollution and Mortality: A
New Method of Analyzing Correlated
Geographic Cohort Data” Environmental
Health Perspectives 109, (June 2001): 375-
380.

We present a new statistical model for linking
spatial variation in ambient air pollution to
mortality. The model incorporates risk factors
measured at the individual level, such as
smoking, and at the spatial level, such as air
pollution. We demonstrate that the spatial
autocorrelation in community mortality rates,
an indication of test fully characterizing
potentially confounding risk factors to the air
pollution-mortality association, can be
accounted for through the inclusion of location
in the model assessing the effects of air
pollution on mortality. Our methods are
illustrated with an analysis of the American
Cancer Society cohort to determine whether all
cause mortality is associated with
concentrations of sulfate particles. The relative
risk associated with a 4.2 μg/m3 increase in the
range of sulfate concentration was 0.85 (95%
confidence interval 0.64-1.16) based on the Cox
proportional hazards survival model. Assuming
subjects were statistically independent, inclusion
of community-based random effects yielded a
relative risk of 1.055 (1.033, 1.077), which
represents an increase in the residual variance
compared to that estimated by the Cox model.
Residuals from the random-effects model
displayed strong evidence of spatial
correlation (p < 0.0015). Further inclusion
of location in the model reduced the
spatial
relative risk and the evidence for
correlation as the complexity of the
location surface increased, with a range in
relative risks of 1.055-1.655. We conclude that
data display both spatial variation and
spatial autocorrelation, characteristics not
captured by the Cox survival model. Failure to
account for autocorrelation is likely to
lead to an underestimation of the uncertainty of
the air pollution
association with mortality.

14
Campbell, Carol, Russell Viner,
Roderick Bryant-Waugh, David Nichols,
Deborah Graviss, Colm Garlick, Joyce
caster, Ameneh Lyons, Vasilly Vlasov,
cena Prilliez, J. F. Cassady, C.
Guzman, and N. R. Gailzbur. “Childhood
Obesity” British Medical Journal 320, no.
72-6 (May 2000): 1401-1403.

15
Caprio, Stanis “Tearing Child
Obesity and Associated Medical
Conditions” The Future of Children 16, no.
With American children on course to
move into the most obese generation of adults
in history, some Caprio argue that it is critical

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses

to develop more effective strategies for preventing childhood obesity and treating obesity-related health complications. She notes that although pediatricians are concerned about the obesity problem, most are ineffective in addressing it. Treatment should begin, Caprio explains, with a thorough medical exam, an assessment of nutrition and physical activity, an appraisal of the degree of obesity and associated health complications, a family history, and all information about current medications. Caprio also summarizes the current use of medications and surgery in treating child obesity and argues that for severe forms of obesity, the future lies in developing new and more effective drugs. Caprio explains that today's most effective obesity treatment programs have been carried out in academic centers through an approach that combines a dietary component, behavioral modification, physical activity, and parental involvement. Such programs, however, have yet to be translated to primary pediatric care centers. Successfully treating obesity, she argues, will require a major shift in pediatric care that builds on the findings of these academic centers and translates intervention programs. To ensure that pediatricians are well trained in implementing such programs, the American Medical Association is working with federal agencies, medical specialty societies, and public health organizations to teach doctors how to prevent and manage obesity in both children and adults. Such training should be a part of undergraduate and graduate medical education in a continuing medical education program. Caprio also discusses the problem of reimbursement for obesity treatment. Despite the high costs of obesity, pediatricians often lack support from health insurers, thus putting long-term weight-management programs beyond the reach of most. Caprio argues that obesity should be recognized as a disease and receive coverage for its treatment just as other diseases.

20 City of Palo Alto, Palo Alto Community Profile, City of Palo Alto, July 2005.

The purpose of this paper is to model competition in freight transport and to work out the role of government in providing infrastructure for the competition. Freight transport could in principle be provided by the firm itself by using firm-owned trucks, or transport services could be outsourced by purchasing services from rail and/or truck transport firms. We link production in the rest of the economy to transport demand, provided by two competing modes of transport: given infrastructure, a firm's demand for vehicles, we first derive the condition for demand functions of the economy for truck and rail services. The two transport modes know these demand functions and compete in prices. We then propose a transport policy that chooses two types of infrastructure, highways and the railway system, and a fuel tax in order to maximize welfare. The economic aspects for an optimal provision of the two types of infrastructure can be expressed by a set of unknown elasticities that measure the impact of infrastructure services on price and quantity.
variables in transport industries. With time-series data for the German economy we measure these impacts on pieces in the oil and truck industries, on the volume of transport, on congestion, and on the utilization of the stock of transport equipment.


Demographers usually study population and environment in preindustrial settings where "environment" means food, forest, or land. California, in contrast, is an advanced industrial state with rapid population growth and complex environmental stresses. In this paper I examine the effects of population growth on carbon monoxide (CO) and ozone, the principal ingredients of smog. Ozone and NO are monitored at numerous local sites throughout California. Wind currents are strong, so the level of ozone or CO at a site may depend on population size and other factors upwind as well as at that site. I use linear regression and interaction analysis to examine the relationships among CO, NO, and population size at sites. Population growth is measured at three levels: site, county, and upwind; and trends in NO per capita income and air pollution regulations are controlled. Local population growth has a substantial impact on CO; in contrast, population growth at any level has a very small or even negative impact on ozone. The methodological and policy implications of this implausible finding are discussed.

de Hartog, Jeroen J., Timo Lahn, Kristi L. Timonen, Gerard Hoek, Nicole A. H. Janssen, Angela maili-Mall, Annette

Abstract: Background: It has been hypothesized that ambient particulate air pollution is able to modify the autonomic nervous control of the heart, measured as heart rate variability (HRV). Previously we reported that people with heart rate variability (HRV) measured in 10 mm intervals on a 24-hour basis have lower diastolic blood pressure and lower HRV. In this study, we investigated whether exposure to particulate matter with aerodynamic diameter <2.5 micrometers (PM2.5) and HRV were independent predictors of cardiovascular disease (CVD). Methods: Participants were enrolled from a community-based study of adults followed for 6 years. The study population included 10,487 participants with complete data on exposure to PM2.5 and HRV. The primary outcome was incident CVD, defined as a new diagnosis of coronary heart disease, stroke, or death from CVD. Results: In a multivariate model, exposure to PM2.5 was associated with an increased risk of CVD (HR 1.5, 95% CI 1.1-2.0) and decreased HRV was associated with an increased risk of CVD (HR 1.3, 95% CI 1.0-1.6) in this population. Conclusions: Our results suggest that differences in the composition of particulate matter and HRV are associated with differences in CVD risk.
### 25


Outdoor ambient airpollutant exposures in communities are relevant to the acute exacerbation and possibly the onset of asthma. However, the complexity of pollutant mixtures and epiphenomenological heterogeneity of asthma has made it difficult to identify causal components in those mixtures. Occupational exposures associated with asthma may yield clues to causal components in ambient air pollution because such exposures are often identifiable as single-chemical agents (e.g., metal compounds). However, translating occupational to community-exposure-response relationships is limited. Of the air toxics found to cause occupational asthma, only formaldehyde has been frequently investigated in epidemiologic studies of allergic respiratory responses to indoor air, whose general consistency can be shown despite lower ambient exposures. The specific volatile organic compounds (VOCs) identified in association with occupational asthma are generally not the same as those in studies showing respiratory effects of VOC mixtures on non-occupational adult and pediatric asthma. In addition, experimental evidence indicates that airborne polycyclic aromatic hydrocarbons (PAH) exposures linked to diesel exhaust particles (DEPs) have pronounced effects on airways, but there is insufficient evidence from the occupational literature of effects of DEPs on asthma or lung function. In contrast, non-occupational epidemiologic studies have frequently shown associations between allergic respiratory responses to asthma and exposure to ambient air pollutants with DEP components, including black smoke, high-borne or school traffic density (particularly truck traffic), and environmental tobacco smoke. Other particle-phase and gaseous co-pollutants are likely causal in these associations as well. Epidemiologic research on the relationship of both asthma onset and exacerbation to air pollution needs to delineate effects of air toxics from non-toxic criteria air pollutants such as particulate matter. Community studies should focus on air toxics expected to have adverse respiratory effects based on biological mechanisms, particularly irritant and immunological pathways to asthma onset and exacerbation.

### 26


This paper reviews the methods, data, results, uses, and limitations of several recent studies of the external environmental damage costs of motor-vehicle use in the US. Although these remain considerable uncertainty in all stages of the damage-cost model, the results can nevertheless enrich cost-benefit and pricing analyses. Toward these ends, estimates of external costs have been used in comparisons of the social costs of different transport technologies or modes, in evaluations of the trade-offs between different kinds of environmental impacts, and in analyses of motor-vehicle pricing and land-use policies.

### 27


Background: Ambient levels of air pollution may affect the health of children, as indicated by studies of asthma and perinatal mortality. Scientific evidence has also correlated low birth weight and perinatal death, which are important determinants of pediatric death, with air pollution. However, most of these studies used ambient concentrations measured at monitoring sites, which may not consider differential exposure to pollutants found at elevated concentrations near heavy-traffic roadways. Objectives: Our goal was to examine the relationship between traffic-related pollution and perinatal mortality. Methods: We used the information collected for a case-control study conducted in 14 districts in the City of São Paulo, Brazil, regarding risk factors for perinatal deaths. We conducted two residential addresses of cases (fetal and neonatal deaths) and controls (children who survived the 7th day of life) and evaluated a...

This paper aims to provide insight on whether bicycling for everyday travel can help US adults meet the recommended levels of physical activity and that public infrastructure may play an encouraging this activity. The study collected data on bicycling behavior from 165 regular cyclists in the Portland, Oregon area using global positioning system (GPS) devices. Sixty percent of the cyclists rode for more than 190 minutes per week during the study and nearly all of the bicycling was for utilitarian purposes, not exercise. A disproportionate share of the bicycling occurred on streets with bicycle lanes, separate paths, or bike boulevards.

Objective—Bicycles have long been recognized as a carcinogen and recent concern has centered on the effects of continuous exposure to low concentrations of benzene both occupationally and environmentally. This paper presents an overview of the current knowledge about human exposure to benzene in the United

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
8 hours/day—for example, a maintenance
worker—who can receive a mean daily
exposure of about 830 μg (equal to an
estimated exposure of 94 μg/m³). The major
health risk associated with close
exposures of exposure to benzene has been
determined to be leukemia in particular.
leukemic lymphocytic leukemia. The mean
concentration of exposure at which an increased
incidence of acute non-lymphocytic leukemia
among occupationally exposed workers has been
reliably detected, has been estimated to be in
the range of 38–40 mg/m³. Although some
studies have suggested that effects may occur
at lower concentrations, clear estimates of risk
have not been determined, partly because of the
inadequacy of exposure data and the few cases.
Conclusions—Overall the evidence from
human studies suggests that any risk of
leukemia at concentrations of exposure in the
general population of 3.3–4.4 μg/m³—that is at
concentrations three orders of magnitude less
than the occupational lowest observed effect
level—is likely to be exceedingly small and
probably not detectable with current methods.
This is also likely to be true for infants and
dehiscent children who may be exposed
continuously to concentrations of 3.3–4.4 μg/m³.
As yet there is no evidence to suggest that
continuous exposures to these environmental
concentrations of benzene manifest any
other adverse effect.

30

Riboflavin, Qian B., Hela Sch, Neild S. Schwartz, Brent A. Caill and Diane E. Gold. “Diabetes, Obesity, and Hypertension May Enhance Associations between Air Pollution and Markers of Systemic Inflammation.” Environmental Health Perspectives 114, no. 1 (July 2006): 792–998.

Airborne particulate matter (PM) may lead to increased cardiovascular risk through an inflammatory pathway. Therefore, we investigated the associations between ambient PM and markers of systemic inflammation among repeated measurements from 445 senior citizens (≥
65 years of age) and examined susceptibility by conditions linked to chronic inflammation. Mixed models were used to identify associations between concentrations of fine PM (particulate matter 2.5 μm in size (PM2.5)) averaged over 1-7 days and markers of systemic inflammation.}

31


Epidemiologic reports by C.A. Poole et al. demonstrated that in the Utah Valley, closure of an open-hearth steel mill over the winter of 1987 was associated with reductions in respiratory disease and related hospital admissions in valley residents. To better examine the relationship between plant-associated changes in ambient particulate matter (PM) and respiratory health effects, we obtained data from the Utah State Health Department and the Utah Clean Air Study. During the winter of 1986 (before closure), 1987 (during closure), and 1988 (after plant...
reopening, PM subcomponents were water-extracted from these filters and Sprague-Dawley rats were intentionally installed with equivalent masses of extract. Data indicated that 24 hr later, rats exposed to 1985 or 1988 extracts developed significant pulmonary injury and neutrophilic inflammation. Additionally, 50% of rats exposed to 1986 or 1988 extracts had frequently airway responsiveness to acetylcholine, compared to 17 and 25% of rats exposed to saline or the 1987 extract, respectively. By 96 hr, these effects were largely corrected except for increases in lung lavage fluid neutrophils and lymphocytes in 1986 extract-exposed rats. Analogous effects were observed with lung histologic assessment. Extract analysis using inductively coupled plasma mass spectrometry demonstrated in all three extracts nearly 40% of the mass appeared to benzene-based salts derived from the glass fiber matrix. Interestingly, relative to the 1987 extract, the 1985/1988 extracts contained more sulfur, calcium salts (i.e., calcium, potassium, magnesium), and other metals (i.e., copper, zinc, iron, lead, strontium, manganese, nickel). Although total metal content was ≤1% of the extracts by mass, the greater quantity detected in the 1985 and 1988 extracts suggests metals may be important determinants of the pulmonary toxicity observed. In conclusion, the pulmonary effects induced by exposure of rats to water-based extracts of local ambient PM filters were in good accord with the cross-sectional epidemiologic reports of adverse respiratory health effects in Utah Valley residents.


In the conventional four-step travel demand modeling process, the number of trips made by a household is modeled in terms of household size, income, and other sociodemographic variables; any effect of location, land use, or transportation service level is discounted. This is the same as discounting any effect of household accessibility to out-of-home activities as a factor in trip generation (accessibility depending on all three: location, land use, and transportation service level). In contrast to the practice of trip generation, theory tells us that trip rates must vary with accessibility, and some (not all) empirical studies have found that they do. In light of conflicting empirical studies, and the obvious need for more precise and policy-sensitive travel forecasts, this issue is revisited. The independent effects of land use and accessibility variables on household trip rates were tested for using data from Florida travel surveys. It was found that, after controlling for sociodemographic variables, resi-


In the western United States, vast acres of land are exposed to low levels of atmospheric nitrogen (N) deposition, with interspersed hotspots of elevated N deposition downwind of large, expanding metropolitan centers or large agricultural operations. Biogeochemical processes in western North America demonstrate that some aquatic and terrestrial plant and microbial communities are significantly altered by N deposition. Greater plant productivity is counterbalanced by biotic community changes and deleterious effects on sensitive organisms (fishes and phytoplankton) that respond to low inputs of N (3 to 8 kilograms N per hectare per year). Streamwater nitrate concentrations are elevated in high-elevation catchments in Colorado and are unusually high in southern California and in some chaparral catchments in the southwestern Sierra Nevada. Chronic N deposition in the West is implicated in increased fire frequency in some areas and habitat alteration for threatened species. Between hotspots, N deposition is too low to cause noticeable effects or has not been studied.

Nitrogen (N) deposition in the western United States ranges from 1 to 4 kilograms (kg) per acre (ac) per year over much of the region to as high as 36 to 90 kg per ha per year downwind of major urban and agricultural areas. Primary N emissions sources are transportation, agriculture, and industry. Emissions of N as ammonia are about 50% as great as emissions of N as nitrogen oxides. An unknown amount of N deposition to the West Coast originates from Asian N sources.

deposition has increased in the West because of rapid increases in urbanization, population, distance driven, and large concentrated animal feeding operations. Studies of ecological effects suggest that emissions reductions are needed to protect sensitive ecosystems. Deposition rates are unknown for most areas in the West, although reasonable estimates are available for the Inland Northwest, the Colorado Front Range, and central Arizona. National monitoring networks provide long-term wet deposition data and, rarely, estimates of dry deposition data at remote sites. However, there is little information for many areas near emission sources.

This study investigates whether the association seen in research on adults between urban form characteristics and walking for transportation also applies in a sample of late 20-year-olds. Analysis of travel survey data from 3,617 children and adolescents in the Atlanta area revealed that only 14 percent walked at least once a day and only 6 percent walked half a mile or more. Twelve- to 15-year-olds walked most frequently and farthest, and low-income children walked significantly more likely to walk. In addition, walking was more likely among those in smaller households and those with use or fewer cars. A key finding was that the same indicators of walkability that are related to active transportation and physical activity in adults—street connectivity, residential density, and mixed land use—are related in similar ways to walking for transportation in children and especially adolescents. Having recreation space within a kilometer of home was the strongest urban form predictor of walking in this sample. Therefore, the authors recommend that future research should investigate the attributes of parks and recreation spaces that may encourage greater use, leading to significant health benefits.


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Friel, Gen. “Childhood Obesity: Time for Action, Not Conspicuous: Definitions Are Unclear, but Effective Interventions Exist”  

Gilliland, Frank, Ed Avol, Patrick Kinney, Michael Jerrett, Timothy Driscoll, Frederick Durman, Timothy Buckley, Patrick Browne, Gerald Keeler, Tracy de Villiers and Rob McConnell. "Air Pollution Exposure Assessment for Epidemiologic Studies of Prenatal Women and Children: Lessons Learned from the Centers for Children's Environmental Health and Disease Prevention Research"  
*Environmental Health Perspectives* 113, no. 10 (October 2005): 1447-1454.

The National Children's Study is considering a wide spectrum of airborne pollutants that are hypothesized to potentially influence pregnancy outcomes, neurodevelopment, asthma, allergy, immune development, obesity, and other developmental outcomes. This study has identified six subpopulations of interest: a) Selecting individual study subjects with a wide range of exposure profiles maximizes the study's ability to identify associations; b) In studies with large sample sizes, long duration, and diverse outcomes and exposures, exposure assessment should be based on modeling to provide estimates for the entire cohort, supported by subject-derived questionnaire data; c) Assessment of exposure includes assessment of exposure using samples of personal and residential environmental conditions over short periods and in selected microenvironments; d) Understanding issues of spatial-temporal resolution of air pollutants, the accuracy of specific pollutants for components of the complex mixture, and the uncertainty of the exposure assessment model is critical in analysis and interpretation; e) "Usual" temporal, spatial, and physical patterns of activity can be used to modify exposure assessment models; f) Biomarkers of exposure are useful for evaluation of specific exposures that have multiple sources of exposure; these lessons are applied in the National Children's Study, offering unique opportunities to assess the adverse effects of air pollution on interrelated health outcomes during the critical early life period.

Gonzalez, George A. "Urban Growth and the Politics of Air Pollution: The Establishment of California's Automobile Emission Standards"  

The state of California has been the nation's leader in the formulation of automobile emission standards. Given that California is at the center of policymaking in the U.S. with regard to automobile emissions standards, this study analyzes the factors that have historically shaped the formulation of California's standards. Policy analysis in this area, to explain the development of the state's pollutants abatement policies, largely concentrates on the role of public officials, scientists, and interest group competition. The author of this study, however, centers his analysis on economic elites. He specifically holds that control of the market to regulate automobile emissions in California is exercised by economic elites whose economic interests lie in rising property values and an expanding local consumer base. These locally oriented elites are at the root of what Harvey Molotch refers to as a "growth coalition.

Hancock, Trevor "Healthy Communities Must Also Be Sustainable Communities"  

The author contends that healthy communities must be both environmentally and socially sustainable, given that health depends on the quality of the built and natural environments, and that global change resulting from the industrial economy is affecting the web of life. He argues that suburban sprawl wastes scarce resources and disproportionately places those resources in the hands of suburban dwellers. Urban areas can be made more environmentally sustainable, especially with respect to energy consumption, which will help reduce air pollution and climate change and contribute in other ways to improved health.

Harder, Ben. "Weighing in on City Planning"  
Rheumatoid arthritis (RA) is a chronic systemic inflammatory disease that affects approximately 1% of the adult population, and to date, genetic factors explain < 50% of the risk. Particulate air pollution, especially of traffic origin, has been linked to systemic inflammation in many studies. Objectives: We examined the association of distance to roads, a marker of traffic pollution exposure, and incidence of RA in a prospective cohort study. Methods: We studied 90,287 U.S. women in the Nurses’ Health Study. We used a geographic information system to determine distance to roads at the residence in 2000 as a measure of traffic exposure. Using Cox proportional hazards models, we examined the association of distance to road and incident RA (1976-2004) with adjustment for a large number of potential confounders. Results: In models adjusted for age, calender year, race, cigarette smoking, parity, activity, menopausal status, and hormone use, maternal contraceptive use, body mass index, physical activity, and concomitant chronic conditions and hormone use, maternal contraceptive use, body mass index, physical activity, and concomitant chronic conditions and hormone use, we observed an elevated risk of RA (Hazard ratios [HR] = 1.31; 95% confidence interval [CI] = 1.04-1.63) with proximity to roads and RA (HR = 1.72; 95% CI, 1.21-2.43), and non-residents with RA (HR = 1.51; 95% CI, 1.12-2.04). We saw no elevations in risk in women living 50-200 m from the road. Conclusions: The observed association between exposure to traffic pollution and RA suggests that pollution from traffic in adulthood may be a newly identified environmental risk factor for RA.

Hoyne, Cheryl L., Patricia A.

The marked increase in the prevalence of obesity appears to be attributable to environmental conditions that implicitly encourage physical activity while explicitly discouraging physical activity. In the United States, food and restaurant industries are heavily involved in advertising for unhealthy food, and receive inadequate nutritional information, especially in restaurants. In the US school environment, children have access to sugary sodas and unhealthy fast foods in their cafeteria, at the same time getting inadequate physical activity and nutrition education. The built environment, sprawl, has reduced active living. We describe these environments and explore the potential benefits of regulatory measures on these environments. In the United States, regulatory opportunities exist at the national, state, and local levels to mandate action and to allocate funds for pathways for promoting health-promoting strategies. Regulatory approaches, such like litigation, can transform the entire environment in which corporations operate. Even with incomplete enforcement of rules, they send a clear message about what is acceptable behavior for corporations and individuals. Additionally, because the United States is a party to many multilateral and bilateral trade agreements and is an active participant in the GATT/WTO framework, US regulatory actions promise to have a beneficial impact both domestically and globally.


Abstract: Background: Long-term exposure to urban air pollution may exacerbate inflammatory states, but mechanisms are still unclear. The objective is to examine the association of residential long-term exposure to particulate matter (PM) and high traffic with systemic inflammatory markers. Methods: We used baseline data from the German Integrated Nissan Recall Study, a population-based...
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<th>Page 42</th>
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<td>prospective cohort study of 4,814 participants that started in 2000. Fine PM (aerodynamic</td>
<td>respectively. We identified housing and health</td>
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<td>diameter ≤ 2.5 μm (SPM,≤2.5 μm)</td>
<td>trends from approximately 1970 to 2000, after</td>
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<td>exposure based on a small area dispersion</td>
<td>excluding these trends for which data were</td>
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<td>and chemistry transport model was assigned to</td>
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<td>each home address. We calculated distances</td>
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<td>between residences and major roads. Long-</td>
<td>Changes in housing include construction type,</td>
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<td>term exposure to air pollution (annual</td>
<td>properties of rental versus home ownership,</td>
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<td>SPM,≤2.5 μm) and distance to high traffic)</td>
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<td>and concentration of inflammatory markers (high-</td>
<td>windows, ventilation and air conditioning, and</td>
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<td>sensitivity C reactive protein (hs-CRP) and</td>
<td>water leaks. Changes in health measures</td>
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<td>fibrinogen) on the day of the baseline visit</td>
<td>include asthma, respiratory illness, obesity and</td>
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<td>were analyzed with sex-stratified multiple</td>
<td>diabetes, and lead poisoning, among others.</td>
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<td>linear regression models controlling for individual-</td>
<td>The results suggest that both childhood lead</td>
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<td>level risk factors. Results: In the adjusted</td>
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<td>analysis, a cross-sectional exposure difference</td>
<td>ventilation; asthma exacerbates asthma and</td>
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<td>of 3.01 μg/m³ in PM2.5 (interdecile range)</td>
<td>asthma exacerbates asthma and ventilation,</td>
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<td>was associated with increase in hs-CRP of</td>
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<td>22% (95% confidence interval (CI), 12.1 to 37.4%) and</td>
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<td>fibrinogen of 3% (95% CI, 0.3 to 7.7%) in men, whereas</td>
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<td>we found no association in women. Chronic traffic</td>
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<td>exposure was not associated with inflammatory</td>
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<td>markers. Short-term exposure to air pollutants</td>
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<td>and temperature did not influence the results</td>
<td>asthma exacerbates asthma and ventilation,</td>
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<td>markedly. Conclusions: Our study indicates</td>
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<td>that long-term exposure to high levels of PM2.5 is</td>
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<td>associated with systemic inflammatory markers in men. This might</td>
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<td>provide a link between air pollution and coronary</td>
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4-64

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
Background. Chronic exposure to traffic-related air pollution (TRAP) may contribute to premature mortality, but few studies to date have addressed this topic. Objectives: In this study we assessed the association between TRAP and mortality in Toronto, Ontario, Canada. Methods: We collected nitrogen dioxide samples over two seasons using duplicate two-sided Ozone passive diffusion samplers at 143 locations across Toronto. We calibrated the use regressions to predict NO2 exposure on a fine scale within Toronto. We used interpolations to predict levels of particulate matter with aerodynamic diameter ≤ 2.5 µm S(2.5 µm PAM) on census blocks. We assigned predicted pollution exposures to 2,360 subjects from a respiratory clinic, and abstracted health data on these subjects from medical histories, lung function tests, and questionnaires by pulmonologists. We tracked mortality between 1995 and 2002. We used standard and multiple Cox proportional hazard models to test associations between air pollution and mortality. Results: After controlling for age, sex, lung function, smoking, and neighborhood deprivation, we observed a 17% increase in all-cause mortality and a 40% increase in circulatory mortality from an exposure cohort across the interquartile range of NO2 exposure. We observed no significant associations with other pollutants. Conclusions: Exposure to TRAP was significantly associated with increased all-cause and circulatory mortality in this cohort.


Background: The question of whether air pollution contributes to asthma and remains unresolved. Objectives: In this study, we assessed the association between asthma and mortality in children with traffic-related air pollution. Methods: We selected a sample of 217 children from participants in the Southern California Children's Health Study, a prospective cohort designed to investigate associations between air pollution and respiratory health in children 10-18 years of age. Individual covariates and new asthma incidence (30 cases) were reported annually through questionnaires during 8 years of follow-up. Children had nitrogen dioxide monitor placed outside their home for 2 weeks in the summer and 2 weeks in the fall-winter season as a measure of traffic-related air pollution. We used multilevel Cox models to test the associations between asthma and air pollution. Results: In models controlling for confounders, incident asthma was positively associated with traffic pollution, with a hazard ratio (HR) of 1.29 (95% confidence interval (CI), 1.07-1.56) across the average annual range of 6.2 ppb in annual residential S(16NO(16)) (21). Using the total interquartile range for all measurements of 289 ppb increased the HR to 3.25 (95% CI, 1.35-1359). Conclusions: In this cohort, markers of traffic related air pollution were associated with the onset of asthma. The results observed suggest that air pollution exposure contributes to new-onset asthma.
Background: Living near traffic has been associated with asthma and other respiratory symptoms. Most studies, however, have been conducted in areas with high background levels of visible air pollution, making it challenging to isolate an independent effect of traffic. Additionally, most investigations have used surrogates of exposure, and few have measured traffic pollutants directly as part of the study.

Objective: We conducted a cross-sectional study of current asthma and other respiratory symptoms in children (0–18 years) living at varying distances from high-traffic roads in the San Francisco Bay Area, California, a highly urbanized region characterized by good regional air quality due to coastal breezes.

Methods: We obtained health information and home environmental factors by parental questionnaire. We assessed exposure with several measures of residential traffic calculated using geographic information systems, including traffic within a given radius and distance to major roads. We also measured traffic-related pollutants (nitrogen dioxide and nitrogen oxide) for a subset of households to determine how well traffic metrics correlated with measured traffic pollutants. Results: Using multivariate logistic regression analysis, we found associations between current asthma and residential proximity to traffic. For several traffic metrics, children's residences were in the highest quintile of exposure and approximately twice the adjusted odds of current asthma (i.e., asthma episodes in the

Background: Acute myocardial infarction (AMI) is the leading cause of death attributed to cardiovascular diseases. An association between traffic-related air pollution and AMI has been suggested, but the evidence is still limited. Objectives: To evaluate a multistage study association between hospitalization for first AMI and daily levels of traffic-related air pollution. Methods: The authors collected data on first AMI hospitalizations in five European cities. AMI registers are available in Aalborg and Barcelona; hospital discharge registers (HDRs) are used in Helsinki, Rome, and Stockholm. NO2, CO, and PM10 (particles <10 μm) were measured at central monitoring sites. Particle number concentration (PNC), a proxy for ultrafine particles (<0.1 μm), was measured for a year in each city, and an assessment was conducted retrospectively for the whole study period.

Generalized additive models were used for statistical analyses. Age and 28 day data and census data were considered as potential effect modifiers in the three HDR countries. Results: Nearly 21,000 cases of first AMI were recorded. There was a suggestion of an association of the same day CO and PM levels with AMI: RR=1.05 (95% CI: 1.00 to 1.10) per 0.2 ppm and RR=1.05 (95% CI: 0.95 to 1.15) per 1000 particles/m3, respectively. However, associations were only observed in the cities with HDR, where power for city-specific analyses was higher. The authors observed in these cities the most consistent...

Environmental Health Perspectives 110 (April 2002): 144-144.

Objective: To examine the relation between built environment factors (representing several dimensions of urban form of neighborhoods) and walking activity at both the neighborhood level and the residential level, in an older adult sample. Design, setting, participants: A cross-sectional, multi-level design with neighborhoods as the primary sampling unit and senior residents as the secondary unit. Five hundred and seventy-seven residents (mean age 74 years, 67% - 67 years) participated in the survey, which was conducted among 50 city-defined neighborhoods in Portland, Oregon, USA. Neighborhood level variables were computed using geographical information systems. Resident level variables consisted of a mix of self reports and geocoded data on the built environment. Main outcome measure: Self-reported neighborhood walking. Main results: A positive relation was found between built environment factors (density of places of employment, household density, green and open spaces for recreation, number of street intersections) and walking activity at the neighborhood level. At the resident level, perceptions of safety for walking and number of nearby recreational facilities were positively related to high levels of walking activity. A significant interaction was observed between number of street intersections and perceptions of safety from traffic. Conclusion: Certain neighborhood built environment characteristics related to urban form were positively associated with walking activity in the neighborhoods of senior residents. Public health promotion of walking activity/obesity prevention and the design of interventions need to consider the contribution of neighborhood level built environment influences.


As researchers continue to analyze the role of parenting both in the development of childhood overweight and in obesity prevention, studies of child nutrition and growth are detailing the ways in which parental affect their children’s developmental foods and activity-related behaviors. Ana Lindsey.
Gentlemen argue that interventions aimed at preventing childhood overweight and obesity should involve parents as important forces for change in their children's behavior. The authors begin by reviewing evidence on how parents can help their children develop and maintain healthy eating and physical activity habits, thereby ultimately helping prevent childhood overweight and obesity. They show how important it is for parents to understand how their roles as preventing obesity change as their children move through critical developmental periods, from before birth and through adolescence. They point out that research, policymakers, and practitioners should take advantage of such information to develop effective interventions and educational programs that address childhood obesity right where it starts: at home. The authors review research evaluating school- and community-based obesity-prevention interventions that include components targeted at parents. Although much research has been done on how parents shape their children's eating and physical activity habits, surprisingly few high-quality data exist on the effectiveness of such programs. The authors call for more programs and cost-effectiveness studies aimed at improving parents' ability to shape healthy eating and physical activity behaviors in their children. The authors conclude that preventing and controlling childhood obesity will require multifaceted and community-wide programs and policies, with parents having a critical role to play. Successful intervention efforts, they argue, must involve and work directly with parents from the earliest stages of child development to support healthy practices both in and out of the home.

59


Additional Research: The built environment may influence health in part through the promotion of physical activity and exposure to pollution. To date, no studies have explored interactions between neighborhood walkability and air pollution exposure. We estimated concentrations of nitric oxide (NO), a marker for direct vehicle emissions, and ozone (O3) and a neighborhood walkability score, for 46,702 (89% of total) postal codes in Vancouver, British Columbia, Canada. NO concentrations were estimated from a land-use regression model, O3 was estimated from ambient monitoring data, and walkability was estimated based on geographic attributes such as land-use mix, street connectivity, and residential density. Results: All three attributes exhibit an urban-rural gradient, with high walkability and NO concentrations, and low O3 concentrations, near the city center. Lower-income areas tend to have higher NO concentrations and walkability and lower O3 concentrations. Higher-income areas tend to have lower pollution (NO and O3). "Sweat spots" neighborhoods (low pollution, high walkability) are generally located near but not at the city center and are almost exclusively higher income. Policy Implications: Increased concentration of activities in urban settings yields both health costs and benefits. Our research identifies neighborhoods that do exceptionally well (and especially poorly) for walkability and air pollution exposure. Work is needed to ensure that the poor do not bear an unfair burden of urban air pollution and that neighborhoods designed for walking, bicycling, or mass transit do not adversely affect residents' exposure to air pollution.

Physical inactivity is a serious public health problem that is associated with numerous preventable diseases. Public health concern, particularly those related to the increased prevalence of overweight, obesity, and diabetes, call for schools to become proactive in the promotion of healthy, physically active lifestyles. This article begins by differentiating physical activity from associated concepts (e.g., physical education, physical fitness) and then summarizes the literature related to the importance of physical activity for children and the need for its promotion in elementary schools. We describe numerous opportunities for children to accrue physical activity in elementary schools (e.g., physical education classes, recess, extracurricular programs, and active transport to school) and provide recommendations for sound educational practice.


Study objective: To review systematic review literature that describes the effectiveness of transport interventions in improving population health. Methods: Systematic review methodology was used to evaluate published and unpublished systematic reviews in any language that described well-measured health effects of any mode of transport intervention. Main results: 28 systematic reviews were identified. The highest quality reviews indicate that the most effective transport interventions to improve health are health promotion programs (to prevent childhood injuries, to increase bicycle and motorcycle helmet use, and to promote children’s safe seat and seatbelt use), traffic calming, and specific legislation against drink driving. Drive improvement and education courses are associated with increased

Conclusions: Systematic reviews are able to provide evidence about effective ways of improving health through transport-related interventions and also identify well-intentioned but harmful interventions. Valuable additional information may exist in primary studies and systematic reviews have a role in evaluating and synthesizing their findings.


Traditional ways of preventing and treating overweight and obesity have almost inevitably focused on changing the behavior of individuals, an approach that has proven woefully inadequate, as indicated by the rising rates of both conditions. Considering the many aspects of American culture that promote obesity, from the proliferation of fast-food outlets to universal reliance on automobiles, reversing current trends will require a multifaceted public health policy approach as well as considerable funding. National leadership is needed to ensure the participation of health officials and researchers, educators and legislators, transportation experts and urban planners, and businesses and nonprofit groups in formulating a public health campaign with a better chance of success. The authors outline a broad range of policy recommendations and suggest that an obesity prevention campaign might be funded, in part, with revenues from small taxes on selected products that provide "empty" calories—such as soft drinks—or that reduce physical activity—such as automobiles.


66 Farrow, Ian W. H., Margaret Walls, and Winston Harkness. "Automobile Externalities and Policies." *Journal of...

This paper discusses the nature, and magnitude, of externalities associated with automobile use, including local and global pollution, oil...

In urban transportation planning, it has become critical (1) to determine the travel time of a traveler and how it is affected by congestion, and (2) to understand how traffic distributes in a transportation network. In the first part of this paper, we derive an analytical function of travel time, based on the theory of kinematic waves. The travel-time function integrates the traffic dynamics as well as the effects of shocks. Numerical examples demonstrate the quality of the analytical function, in comparison with simulated travel times. In the second part of this paper, we incorporate the travel-time model with a dynamic user equilibrium (DUE) setting. We prove that the travel-time function is continuous and strictly monotonic when the flow varies smoothly. We illustrate how the model applies to solve a large network assignment problem through a numerical example.


In this paper, we examine the relationship between urban sprawl and obesity using a self-selection model. We find that individuals who live in more sprawling areas are more likely to be overweight, but this relationship is weaker when controlling for other socioeconomic factors. The results suggest that urban planning policies could play a role in reducing obesity rates.


In this report, the authors analyze the economic implications of fuel economy standards. They find that implementing such standards could lead to increased vehicle efficiency and reduced oil dependency, but also raise concerns about the impact on the automotive industry and consumer costs. The report concludes that a well-designed policy framework can balance these considerations to achieve environmental goals.


The study examines the relationship between childhood cancer incidence rates and hazardous air pollutants in California. The authors find evidence of an association between certain air pollutants and increased cancer rates, particularly for leukemia. The results suggest that further research is needed to better understand the environmental factors contributing to childhood cancer.


This report discusses the implementation of congestion charging in urban areas to reduce traffic congestion and improve road safety. The authors highlight the importance of considering the impact on pedestrian safety, particularly for those living in environments with high levels of traffic. The report concludes that a well-designed congestion charging scheme can effectively address traffic congestion while minimizing the impact on vulnerable road users.

Hazards air pollutants (HAPs) are compounds known to cause cancer or other adverse health effects. We analyzed population-based childhood cancer incidence rates in California (USA) from 1988 to 1994. By using TAP exposure scores, we found increased cancer risk in census tracts. To examine these results, we calculated exposure scores for the surrounding census tracts. Using these scores, we found increased cancer risk in census tracts.
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<td><strong>Robins, Christopher J.</strong></td>
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<td>This study investigates the relationship between economic conditions and health. Total mortality and eight of the ten sources of fatalities examined are shown to exhibit a cyclical fluctuation, with suicides representing an important exception. The variations are larger for these causes and age groups where behavioral responses are most plausible, and there is some evidence that the unfavorable health effects of temporary upturns are partially if not fully offset if the economic growth is long-lasting. An accompanying analysis of microdata indicates that smoking and obesity increase when the economy strengthens, whereas physical activity is reduced and diet becomes less healthy.</td>
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<tr>
<td><strong>Sallis, James F. and Karen Glanz.</strong></td>
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<td>Over the past forty years various changes in the U.S. &quot;built environment&quot; have promoted sedentary lifestyles and less healthful diets. James Sallis and Karen Glanz investigate whether these changes have had a direct effect on childhood obesity and whether improvements to encourage more physical activity and more healthful foods are likely to lower rates of childhood obesity. Researchers, say Sallis and Glanz, have built many links between the built environment and children's physical activity, but they have yet to find conclusive evidence that aspects of the built environment promote obesity. For example, certain development patterns, such as a lack of sidewalks, long distances to schools, and the need to cross busy streets, discourage walking and biking to school. Eliminating such barriers can increase rates of active commuting.</td>
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**Endnotes**

- Sallis and Glanz note that recent changes in the nutrition environment, including greater reliance on convenience foods and fast foods, a lack of access to fruits and vegetables, and expanding portion sizes, are also widely believed to contribute to the epidemic of childhood obesity. Few studies, conclusive evidence that changes in the nutrition environment will reduce rates of obesity does not yet exist. Research into the link between the built environment and childhood obesity is still in its infancy. Analysts do not know whether changes in the built environment have increased rates of obesity or whether improvements to the built environment will decrease them. Nevertheless, say Sallis and Glanz, the policy implications are clear. People who have access to safe places to be active, neighborhoods that are walkable, and local markets that offer healthful food are likely to be more active and to eat more healthful food—two types of behavior that can lead to good health and may help avoid obesity.

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**Environmental Impact Report**

- July 27, 2010
- Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
- 4-71
site effect. In single-pollutant models, PM10 (particulate matter with a mass median aerodynamic diameter less than 10 µm) was associated with all three outcomes (p < 0.05). Sulfur dioxide (SO2) was significantly associated only with white cell counts, nitrogen dioxide (NO2) with platelet counts and fibrinogen, and ozone with none of the outcomes. In two-pollutant models, PM10 remained a significant predictor of white cell counts controlling for SO2, but not vice versa. PM10 was marginally significant in a model for platelet counts with NO2, and the sign of the NO2 coefficient was reversed. These results were stable with control for indoor exposures (wood stoves, environmental tobacco smoke, gas stoves, fireplaces), dietary risk factors (saturated fat, alcohol, caffeine intake), a 3-day dietary, and season of birth. The magnitude of the effects are modest (e.g., 1 µg/m³ fibrinogen for an interquartile range (IQR) change in PM10, 95% confidence interval (CI) 0.6-22.1 µg/m³). However, the odds ratio of being in the top 10% of fibrinogen for the same IQR change was 1.77 (95% CI 1.26-2.49). These effects provide considerable biologic plausibility to the mortality studies. PM10, but not gaseous air pollutants, was associated with blood markers of cardiovascular risk, and this may explain epidemiologic associations with early deaths.


Background: Some studies have suggested that particulate matter (PM) levels during pregnancy may be associated with birth weight. Road traffic is a major source of fine PM (PM2.5 with aerodynamic diameter < 2.5 µm). The PM2.5 objective of the ELSA study was to characterize the influence of maternal exposure to atmospheric pollutants on the development of fetal growth. Methods: Women born in a birth cohort (the ELSA) were followed from birth to age 35. Lifestyle factors were measured through standardized interviews. Birth outcomes were assessed through standardized questionnaires. Results: Maternal exposure to PM2.5 levels was associated with decreases in birth weight. Traffic-related air pollutants may have adverse effects on birth weight.


Mary Story, Karen Kaphingst, and Susannah Feldman argue that U.S. schools offer many opportunities for developing obesity-prevention strategies by providing more nutritious food, offering greater opportunities for physical activity, and providing obesity-related health services. Meals, snacks, and beverages available at school are marketed by the U.S. Department of Agriculture's school lunch programs and under "competitive foods" sold to certain cafeterias, vending machines, and snack bars. School breakfasts and school lunches must meet federal nutrition standards, but competitive foods are exempt from such requirements. And budget pressures force...
schools to sell the popular but nutritionally poor foods à la carte. Public dissonance with the school food environment is growing. But can schools provide more healthful food options without raising revenues? Limited evidence shows that they can. Although federal nutrition regulations are inadequate, they permit state and local authorities to impose additional restrictions. And many are doing so. Some states limit sales of trans fat-filled foods, and many large school districts restrict competitive foods. Several interventions have changed school food environments, for example, by reducing fat content of food in vending machines and making more fruits and vegetables available. Interventions are just beginning to target the availability of competitive foods. Other pressures can also compromise schools’ efforts to encourage physical activity. As states use standardized tests to hold schools and students academically accountable, physical education and recess have become a lower priority. But some states are now mandating and promoting more physical activity in schools. School health services can also help address obesity by providing screening, health information, and referrals to students, especially low-income students, who are at high risk of obesity, tend to be underinsured, and may not receive health services elsewhere.

Objective: In this review we describe the approach taken by the National Children’s Study (NCS), a 21-year prospective study of 90,000 American children, to understand the role of environmental factors in the development of obesity. Data sources and extraction: We review the literature with regard to the two core hypotheses in the NCS that relate to environmental origins of obesity and describe strategies that will be used to test each hypothesis. Data synthesis: Although it is clear that obesity in an individual results from an imbalance between energy intake and expenditure, central to the obesity epidemic will require understanding of factors in the modern built environment and chemical exposures that may have the capacity to disrupt the link between energy intake and expenditure. The NCS is the largest prospective birth cohort study ever undertaken in the United States that is explicitly designed to seek information on the environmental causes of pediatric disease. Conclusion: Through its embrace of the life-course approach to epidemiology, the NCS will be able to study the origins of obesity from preconception through late adolescence, including factors ranging from genetic inheritance to individual behaviors to the social, built, and natural environment and chemical exposures. It will have sufficient statistical power to examine interactions among these multiple influences, including gene-environment and gene-obesity interactions. A major secondary benefit will derive from the banking of specimens for future analysis.

Several studies in North American cities have reported associations between air pollution and respiratory symptoms. Repeating these studies in cities with very different population and weather characteristics is a useful way of addressing uncertainties and strengthening inferences of causality. To this end we examined the responses of three different panels to particulate matter (PM) air pollution in Bangkok, Thailand, a tropical city characterized by a very warm and humid climate. Panels of schoolchildren, parents, and adults were asked to report daily upper and lower respiratory symptoms for 3 months. Concentrations of daily PM10 (PM4 with a trans medium aerodynamic diameter less than 10 μm) and PM2.5 (aerosol particles with aerodynamic diameters less than 2.5 μm) were collected at two sites. Generally, associations were found between the PM10 metrics and the daily occurrence of both upper and...
lower respiratory symptoms in each of the panels. For example, an increase of 45.0 g/m³ in PM10 was associated with about 58% increase in lower respiratory symptoms in the panel of highly exposed adults, about 30% in the children, and about 15% in the nurses. These estimates were not appreciably altered by changes in the specification of weather variables, stratification by temperature, or inclusion of individual characteristics in the models, however, these trends in the data cause some uncertainty about the magnitude of the effect of PM on respiratory symptoms. These pollutants were also associated with the first day of a symptom epidemic in both adult panels but not in children. The estimated odds ratios generally consistent with and slightly higher than the findings of previous studies conducted in the United States.

80

The objective of this paper is to make explicit the linkages between specific characteristics in the urban built environment and socioeconomic status and the city and the city-block. At all three scales, the main interest is placed on accessibility, with the recognition that if distances are short enough and there is high connectivity within neighborhoods, people might be encouraged to walk or cycle. The paper will draw on urban built environment characteristics from a number of Michigan municipalities, including Detroit, Ann Arbor, Ingham, East Lansing, and Okemos.

81

82
Walsh, Bob, "Don't Breathe and Drive: Lurking Pollutants" Environmental Health Perspectives 109, no. 9 (September 2001): A422-A427.

83

Background: Traffic-related air pollution has been associated with adverse health outcomes, and the immune system may be a biologic mediator of health effects. Objectives: To analyze associations between traffic exposure and immune status measured by flow cytometry. Methods: We defined a geographic information system (GIS) to determine residential proximity to major roads among 115 postmenopausal, overweight women in the greater Seattle, Washington (USA), area whose immunity was assessed at the baseline visit of an exercise intervention trial. We evaluated three inflammatory markers (C-reactive protein, serum amyloid A, and interleukin-6) and two functional assays of cellular immunity (natural killer (NK) cell cytotoxicity and T-lymphocyte proliferation). Results: Women living within 150 m of a major road had 21% lower NK cytotoxicity compared with women who lived farther from the road (mean cytotoxicity, 19.3%; 95% confidence interval [CI], 15.6-23.5%; vs. mean cytotoxicity, 24.85%; 95% CI, 22.0-27.5%), after adjustment for both individual-level and census tract-level demographic characteristics. This association was limited to women who reported exercising near traffic. Fewer women living near freeways and truck routes. Most of inflammation and lymphocyte proliferation did not consistently differ according to proximity to major roads. Conclusions: If the observed association between residential proximity to traffic and decreased NK cytotoxicity is confirmed in other populations, our results may have implications for local land use policy.
7. City of East Palo Alto Community Development Department – Planning Division, Brent Butler (letter dated July 26, 2010)

7.1 This comment pertains to demand for affordable housing resulting from cumulative development within the City of Palo Alto. The commenter states, “A failure to mitigate both residential and non-residential development will result in increased housing demand. If the construction of affordable housing within Palo Alto does not meet demand [from cumulative development], there would likely be increased demand for affordable housing in East Palo Alto. This unmet demand could force displacement of East Palo Alto families...” Please see Master Response 7 for a discussion of affordable housing demand in East Palo Alto from the SUMC Project.

7.2 The commenter suggests and welcomes measures to reduce air quality impacts through provisions of non-motorized connections to East Palo Alto and affordable housing in East Palo Alto. Please see Master Response 7 for a discussion of affordable housing demand in East Palo Alto from the SUMC Project. The SUMC Project would not create substantial demand for affordable housing in East Palo Alto. In addition, the Study Area for the Transportation Impact Analysis (Appendix C of the Draft EIR) included three East Palo Alto intersections, along University Avenue (see Figure 3.4-1 and Table 3.4-1). As indicated in Draft EIR Section 3.4, Transportation, no significant intersection or roadway level of service (LOS) impacts would occur in East Palo Alto as a result of the SUMC Project. See also Responses 7.3 and 7.5, below, regarding health risk from project-related vehicular emissions within East Palo Alto. The SUMC Project would not result in exposure of sensitive receptors in East Palo Alto to significant health risks. Per Section 15126.4 of the CEQA Guidelines, mitigation measures are not required for effects that are not found to be significant. Also, mitigation measures must be “roughly proportional” to the impacts of the SUMC Project. Since no significant impacts would occur in East Palo Alto due to the SUMC Project, mitigation measures involving non-motorized connections to East Palo Alto and affordable housing in East Palo Alto would not be warranted.

7.3 The commenter states that the EIR does not consider reasonably foreseeable secondary (indirect) consequences, such as transportation impacts on local air quality and mobility in the City of East Palo Alto. The potential human health impact associated with increased traffic on the sections of University Avenue and US 101 traveling through the City of East Palo Alto that could be attributable to the SUMC Project is considered in a supplemental health risk assessment (HRA) entitled Traffic Impacts in the Vicinity of East Palo Alto – Proposed Stanford University Medical Center Facilities Renewal and Replacement Project (East Palo Alto HRA), as included as Appendix BB of this document. The East Palo Alto HRA analysis was conducted using the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines: Assessing the Air Quality Impacts of Projects and Plans (2010). The analysis in the HRA evaluated free flow and queue traffic data in East Palo Alto for both non-SUMC Project and SUMC Project traffic in 2025 (the projected full
occupancy year) as estimated by AECOM. The analysis was completed using CAL3QHCR (a Gaussian air dispersion model approved by the United States Environmental Protection Agency [US EPA] and the California Air Resources Board [CARB] for use in the environmental documentation of transportation projects) to estimate toxic air contaminant and fine particulate matter (PM$_{2.5}$) concentrations.

The results of the air dispersion modeling were combined with BAAQMD default human exposure assumptions to estimate cancer risk, noncancer hazard indices (acute and chronic), and PM$_{2.5}$ concentrations as a result of the exhaust from SUMC Project-related traffic on the sections of University Avenue and US 101 traveling through the East Palo Alto. Exposures to occupants of day care centers, schools, parks, residents (adults and children), senior living/recreational facilities, and housing shelters were also evaluated. The findings of the HRA indicate that incremental cancer risks, noncancer hazard indices (acute and chronic), and PM$_{2.5}$ concentrations are well below BAAQMD CEQA thresholds of significance. Therefore, based on the methods specified by the BAAQMD, emissions from the traffic generated as a result of the SUMC Project do not pose a significant health risk to East Palo Alto residents. With regard to mobility effects, please see Response 7.2, which explains that the SUMC Project would not result in significant traffic congestion in East Palo Alto.

7.4 The commentor identifies the City of East Palo Alto as an environmental justice community that experiences disproportionate adverse environmental effects. The City of Palo Alto and SUMC Project sponsors commissioned the supplemental HRA, described above in Response 7.3, in recognition of these facts, in order to ensure that the residents of East Palo Alto would not be disproportionately affected by the SUMC Project. The City of East Palo Alto’s comments are important, and substantial efforts have been made to address the comments thoroughly.

7.5 The commentor states that the Draft EIR does not adequately address the effects of toxic air contaminants (TACs), in particular PM$_{2.5}$, along SUMC Project access routes, in particular within the East Palo Alto Community. The East Palo Alto HRA, included as Appendix BB of this document, estimates the potential human health impacts associated with increased traffic related to the SUMC Project, including diesel truck traffic, on the sections of University Avenue and US 101 traveling through the City of East Palo Alto. The findings of the analysis, which include application of a conservative age sensitivity factor that accounts for childhood exposure, indicate that incremental cancer risks, noncancer hazard indices (acute and chronic), and PM$_{2.5}$ concentrations are well below BAAQMD CEQA thresholds of significance. Therefore, based on the methods specified by the BAAQMD, the traffic generated as a result of the SUMC Project does not pose a significant health risk to East Palo Alto residents. Please refer to Response 7.3, above, for additional discussion of the analysis of PM$_{2.5}$. 

*Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses*
The air quality analysis uses traffic data for East Palo Alto estimated by AECOM for 2025 for non-SUMC Project and SUMC Project traffic. This considered all vehicle classes, including trucks. Although 26 percent of SUMC Project traffic would travel through East Palo Alto (11 percent from the Dumbarton Bridge and 15 percent from US 101), the actual increase in traffic from the SUMC Project along the modeled road segments would be relatively small. The average increase in traffic along University Avenue US 101 and the entrance and exit ramps would be approximately 3 percent. The analysis considers the impact on health from traffic along University Avenue, US 101, and the entrance and exit ramps. Of the roadways in East Palo Alto, these roadways would experience the largest increase in SUMC Project-related traffic, and therefore, adjacent areas would experience the largest impact on human health as they would carry the majority of SUMC Project traffic passing through the East Palo Alto area. To the extent cut through, or other traffic, would occur elsewhere in East Palo Alto, it would be at lower volumes, and therefore lower emissions than those modeled on University Avenue, US 101, and the entrance and exit ramps. Since the impact of the modeled SUMC Project traffic is well below the thresholds, it can be reasonably assumed that the TAC and PM$_{2.5}$ impacts around other roads in the area would also be less than significant because SUMC Project cut-through traffic volumes would be even less than on the identified roadways.

The health impact of the queues along University Avenue during all hours of the day was also analyzed. According to the analysis, the addition of SUMC Project-related traffic to queues along University Avenue would not significantly impact human health.

7.6 The commentor states that the Draft EIR analysis of TACs is irrelevant because of uncertainty with regard to the impact of the Corporate Average Fuel Economy (CAFE) Standards and the EIR should mitigate TAC impacts accordingly. Please refer to Response 7.5, above, for additional discussion of traffic-related air quality impacts and Response 7.7, below, for a discussion of CAFE Standards.

7.7 The commentor identifies concerns with the CAFE Program and the assumption that increased fuel efficiency would translate into improved air quality. According to the US EPA and the National Highway Traffic Safety Administration’s Joint Technical Support Document,¹ a driver's vehicle use is weakly affected by per mile cost of driving as the rebound effect is estimated to be in the range of 3 to 16 percent over the period from 2010 through 2030. While improved CAFE standards may reduce the cost of driving, criteria pollutant (including carbon monoxide, hydrocarbons, and oxides of nitrogen) emission standards promulgated on a per mile basis have been reduced significantly since the inception of the CAFE standard, more than offsetting any marginal increase in driving due to the rebound effect.

The commentor presents justification for inclusion of public health impacts in the EIR. The health risks of the SUMC Project have been evaluated as part of the East Palo Alto HRA, in Appendix BB of this document. Please refer to Responses 7.3 and 7.5, above, for additional discussion of the health risk analysis.

The commentor identifies concerns with the air quality model used to support conclusions for air quality impacts in the Draft EIR. The air quality analysis in the East Palo Alto HRA, Appendix BB of this document, does not use CALINE 4, but instead uses CAL3QHCR, a Gaussian air dispersion model approved by the US EPA, ARB, and BAAQMD for use in the environmental documentation of impacts from transportation sources. CAL3QHCR is a refined version of US EPA’s CAL3QHC, which is a multi-source model developed in 1990 to estimate air concentrations of vehicle emissions near roadway intersections. CAL3QHCR is used to estimate air concentrations at receptors located adjacent to freeways or other high traffic volume roads. The CAL3QHCR model is recommended in US EPA’s Guideline on Air Quality Models (also published as Appendix W of 40 CFR Part 51) to determine air pollution concentrations from motor vehicles emissions at receptor locations downwind of freeways located in relatively uncomplicated terrain. With CAL3QHCR, the analysis also uses a representative meteorological data set for the City of East Palo Alto that incorporated hourly surface and twice-daily upper air data for estimating the dispersion of emissions through the atmosphere.

In addition, the analysis also applies hourly data that are reflective of the change in traffic conditions throughout the day; where uncertain, a more conservative approach for the model setup was adopted. Additionally, the analysis specifically evaluated TACs associated with vehicle exhaust, including diesel particulate matter (DPM), acetaldehyde, benzene, 1,3-butadiene, formaldehyde, and acrolein; and fine particulate matter, PM$_{2.5}$, from both exhaust and non-exhaust sources (i.e., tire and brake wear). Thus, the methodology used in the HRA, and the resulting analysis, were specifically tailored to reflect environmental conditions existing in East Palo Alto.

The commentor expresses concern that the air quality model did not measure spillover traffic. Please refer to Response 7.9 regarding the air quality model used in the East Palo Alto HRA. The East Palo Alto HRA analyzes the impacts on health from traffic along University Avenue and US 101. Of the roadways in East Palo Alto, these roadways would have the largest impact on human health as the majority of SUMC Project traffic passing through the City is anticipated to use these roadways. Although 26 percent of SUMC Project traffic would travel through East Palo Alto (11 percent from the Dumbarton Bridge and 15 percent from US 101), there would be only a small increase in traffic from the SUMC Project along the modeled road segments as stated in Response 7.5, above. The findings indicate that the SUMC Project’s incremental health risks would be below the BAAQMD CEQA thresholds of significance for the roadways analyzed. Since the impact
of the modeled SUMC Project traffic would be well below the thresholds, it can be reasonably assumed that the TAC impacts around other roads in the area would also be less than significant because SUMC Project cut-through traffic volumes would be even less than on the identified roadways.

7.11 The commentor identifies concerns that the Draft EIR does not adequately address congestion related delays at intersections. The East Palo Alto HRA evaluates the health risks from the University Avenue ramps from total and SUMC Project traffic and determines that the SUMC Project’s incremental health risks would be below the BAAQMD thresholds of significance.

7.12 The commentor refers to the Housing Needs Analysis (Appendix K of the Draft EIR), points out that this study omits multiplier effects (see page 39 of the Housing Needs Analysis), and indicates that the trip generation in the transportation analysis may be underestimated because the multiplier effect was not included. The Housing Needs Analysis identified the increased employment that would be generated by the SUMC Project. As explained on pages 38 and 39 of the Housing Needs Analysis, multipliers refer to the concept that income generated by certain types of jobs recycles through the economy, resulting in additional jobs. The Housing Needs Analysis does not include other types of indirect employment and multipliers that could result from the purchase of supplies, food, equipment, pharmaceutical products, etc. by the expanded SUMC.

The Housing Needs Analysis methodology for determining increased employment is a separate issue from the Transportation Impact Analysis (Appendix C of the Draft EIR) methodology for determining trip generation from the SUMC Project. As explained on page 3.4-45 of the Draft EIR, trip generation rates for the SUMC Project were determined using data collected from existing facilities. Driveway counts were conducted at 20 parking areas serving the SUMC Sites during the AM (7:00-9:00) and PM (4:00-6:00) Peak Hours. Trip generation rates were then calculated based on the traffic volumes and the size of existing and proposed buildings. Trips generated for the full build-out (100 percent) of the SUMC Project in 2025 are shown in Table 3.4-16 of the Draft EIR. The Traffic Impact Analysis contains details of the review and validation of the hospital trip generation statistics. The trip distribution patterns were based on existing employee residential locations because they represent the best indicator of the location of future employees. The Draft EIR’s methodology for determining trip generation, as well as trip distribution, is appropriate.

7.13 The commentor asserts that roadway congestion and poor access to recreational opportunities could inhibit bicycling or walking, which in turn could exacerbate obesity in East Palo Alto. Increased obesity is not an environmental issue under CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues. Also, the Study Area for the Transportation Impact Analysis in the Draft EIR included three East Palo Alto
intersections, along University Avenue (see Figure 3.4-1 and Table 3.4-1). As indicated in Draft EIR Section 3.4, Transportation, no significant intersection or roadway level of service impacts would occur in East Palo Alto as a result of the SUMC Project. Accordingly, the SUMC Project would not substantially affect access to recreation, bicycling or walking in East Palo Alto.

Given that no significant congestion-related impact would occur, mitigation to address obesity, such as providing access to healthy foods in East Palo Alto stores, is not a required mitigation measure under CEQA.

7.14 The commentor notes that an option considered at the Willow/University Corridor Study advisory committee meetings was to reduce University Avenue from four lanes to two lanes and whether that would reduce speed and cut through traffic. Changing the cross section of University Avenue from four lanes to two lanes is not a consideration for the SUMC Project and would need to be evaluated through a separate process. However, reducing the width to two lanes would probably reduce driving speed since drivers would not have the opportunity to pass other vehicles in the adjacent lane. As to reducing traffic that drives through East Palo Alto, the amount of that reduction is difficult to gauge. Because of increased congestion as a result of only a two-lane roadway, some traffic would be diverted onto other available parallel corridors such as the San Mateo Bridge, Willow Road, and SR 237. Other traffic would continue to use University Avenue but at a different time and the Peak Period would be expanded from two to three hours to possibly three to four hours.

7.15 The commentor states that US 101 divides the City of East Palo Alto, and identifies US 101 as an east/west barrier for pedestrian and bicycle mobility. US 101 is an existing condition that does not result from the SUMC Project. As discussed on page 3.1-7 of the Draft EIR, CEQA Guidelines Section 15126.2(a) explains that, in assessing the impact of a SUMC Project on the environment, the lead agency should normally limit its examination to changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced.

7.16 The commentor states that the Transportation Impact Analysis omits reference to the East Palo Alto General Plan. Given that the SUMC Project would occur within the City of Palo Alto, the City of East Palo Alto General Plan would not be applicable to the SUMC Project. The City has nonetheless opted to apply the significance criteria for intersection level of service of Menlo Park and East Palo Alto in Appendix C to the Draft EIR, Transportation Impact Analysis. In analyzing the SUMC Project’s impacts on three East Palo Alto intersections along University Avenue against East Palo Alto’s significance criteria, no significant impacts have been identified. Additionally, Impact TR-1 on pages 3.4-40 through 3.4-44 of the Draft EIR identifies various construction-period mitigation measures that would ensure that construction trucks would have less-than-significant
impacts. These measures include Mitigation Measures TR-1.5, which involves restriction of truck routes to designated roadways; TR-1.6, which requires the SUMC Project sponsors to protect streets from damage and repair any structural damage to public roadways; and TR-1.8, which in lieu of the previous measures, requires the SUMC Project sponsors to provide a construction impact mitigation plan that identifies an acceptable method of reducing or eliminating significant transportation impacts due to routing and scheduling of materials deliveries, and construction employee arrival and departure schedules, among other construction activities. As indicated in Appendix BB of this document, the SUMC Project would have less-than-significant health effects from traffic emissions in East Palo Alto.

7.17 The commentor states that increased traffic leads to a decrease in non-motorized mobility and an increase in childhood obesity. Please see Response 7.13, above, and Master Response 10 for a discussion of non-CEQA issues.

7.18 The commentor suggests that the analysis should incorporate local planning, thresholds, and existing conditions. In particular, the analysis should consider the City of East Palo Alto Shuttle service, or expansion of the existing service to reduce potential public health impacts. The analysis presented in the East Palo Alto HRA, Appendix BB of this document, evaluates the impacts of SUMC Project-related traffic when traveling on streets in the City of East Palo Alto on sensitive receptors adjacent to those roadways. This analysis applies current approaches recommended by the BAAQMD, CARB, California Office of Environmental Health Hazard Assessment, and US EPA. Since the SUMC Project would not result in a significant health risk or significant traffic effects in East Palo Alto, no mitigation is required.

7.19 The commentor suggests that the air quality analysis in the Draft EIR should address air pollutant loading at intersections in the City of East Palo Alto in addition to the operational and construction-related effects. The air quality analysis in the East Palo Alto HRA estimates the potential human health impact associated with increased traffic on the sections of University Avenue and US 101 traveling through East Palo Alto that could be attributed to the SUMC Project. The findings of the analysis indicate that incremental cancer risks, noncancer hazard indices (acute and chronic), and PM$_{2.5}$ concentrations are well below BAAQMD CEQA thresholds of significance. Therefore, based on the methods specified by the BAAQMD, the traffic generated as a result of the SUMC Project would not result in a significant health risk to East Palo Alto residents. Please refer to Response 7.3, above, for additional discussion of the analysis of PM$_{2.5}$.

7.20 The commentor suggests that the Final EIR should include quantification of the human health risk associated with hazardous air pollutants including TACs. The air quality analysis in the East Palo Alto HRA (Appendix BB) estimates the potential human health impact associated with the SUMC Project in East Palo Alto. Please refer to Response 7.3,
above, for discussion of the analysis of TACs and PM$_{2.5}$. As discussed under Response 7.3, the traffic generated as a result of the SUMC Project would not result in a significant health risk to East Palo Alto residents and mitigation is not necessary.

7.21 The commentor “recognizes a material omission by not including health impacts” in the URBEMIS model. The URBEMIS model outputs in Appendix G of the Draft EIR are intended to address the SUMC Project’s regional emissions of ROG, NO$_x$, PM$_{10}$, and PM$_{2.5}$, as well as localized concentrations of CO. The calculations in Appendix G of the Draft EIR are not intended to address local health risk implications of SUMC Project-related emissions. Please see Response 7.3 of this document regarding health effects of SUMC Project-related vehicular traffic.

7.22 The commentor recognizes a material omission by not including health impacts related to truck routing through East Palo Alto. The climate change calculations in Appendix H of the Draft EIR are intended to address the SUMC Project’s greenhouse gas emissions that would contribute to global climate change. The calculations in Appendix H of the Draft EIR are not intended to address local health risk implications of SUMC Project-related truck trips. Please see Response 7.3 regarding health effects of project-related vehicular traffic. Please also see Appendix V of this Responses to Comments document for revised climate change calculations.

7.23 The comment states that the EIR’s mitigation measures do not specifically state how additional employees generated by the SUMC Project would be housed or where they would live. Please see Master Response 7. Table 3.13-8 of the Draft EIR, as revised in Staff-Initiated Change 7, identifies the estimated distribution of where new employees of the SUMC Project are expected to live. As discussed in pages 3.13-8 through 3.13-14 of the Draft EIR, the comparatively small housing needs of future employees are expected to be accommodated by the housing already forecasted to be built in each of the jurisdictions, and the SUMC Project’s impacts on housing demand would be less than significant and would thus not require mitigation.

7.24 The commentor states that there is no breakdown regarding interim construction jobs and long term permanent jobs. Pages 2-55 through 2-61 of the Draft EIR indicate the number of temporary construction workers that would be employed under the SUMC Project through various stages of the approximately 12-year construction period. As indicated:

- During the four-year construction of the Stanford Hospital and Clinics (SHC) component on the Main SUMC Site, the average number of construction workers on site would range from 500 to 800 workers;

- During the four-year construction of the Lucile Packard Children’s Hospital (LPCH) component, the average number of construction workers on site would range from 270 to 450 workers;
- During the approximately 10-year construction of the Stanford School of Medicine (SoM) component, an average of 150 to 225 construction workers would be on site during construction of the FIM buildings, and 50 workers would be on site for the subsequent demolitions;

- During the two-year construction on the Hoover Pavilion Site, an average of 140 construction workers would be on site.

As indicated on page 4-4 of the Draft EIR, given the limited duration and standard nature of the construction anticipated, the demand for construction employment would likely be met within the existing and future labor market in the City of Palo Alto, in Santa Clara County, or within the Bay Area. It is not relevant for the analysis to determine the specific job titles or categories of construction workers.

As indicated in various portions of the Draft EIR and as pointed out by the commentor, the SUMC Project would result in 2,242 additional employees. Appendix K of the Draft EIR, the Housing Needs Analysis by Keyser Marston Associates, provides a breakdown of existing SUMC employment by compensation range as background information for determining the affordable and market-rate housing demand from new employment (see Appendix 5 to the Housing Needs Analysis). Providing a breakdown by compensation range rather than job titles or categories is more relevant for determining the new employment’s demand for affordable housing.

7.25 The commentor states that Mitigation Measure PH-3.1 does not specify a target number of housing units that will be developed for SUMC employees. No housing is proposed as part of the SUMC Project and the City is not recommending that housing be provided for employees under the main SUMC Project. The Village Concept Alternative recommends 490 housing units be provided for SUMC employees. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

7.26 The commentor expresses concern regarding the availability of housing necessary to accommodate indirect housing demand. Please see Master Response 7 for a discussion of resulting affordable housing demand in East Palo Alto.

7.27 The commentor requests changes to some of the mitigation measures presented in Section 3.4, Transportation, and Section 3.5, Air Quality and requests ongoing consultation with City staff and the legislative body. Please see Responses 7.28 through 7.34, below, for responses to the specific requested changes. The City of Palo Alto believes that it is appropriate to have ongoing consultations with neighboring jurisdictions for the purpose of reducing negative health outcomes not only for sensitive receptors, but for all residents.

7.28 The commentor suggests that the SUMC Project sponsors should fund a community risk reduction plan for the City of East Palo in accordance BAAQMD Guidelines. As noted
under Response 7.3, the air quality analysis in the East Palo Alto HRA (Appendix BB of this document) indicates that incremental cancer risks, noncancer hazard indices (acute and chronic), and PM2.5 concentrations would be well below BAAQMD CEQA thresholds of significance and mitigation would not be required.

7.29 The commentor states that the Lead Agency should amend TR-2.2 so that funds are provided to the City of East Palo Alto for bicycle and pedestrian undercrossing improvements to be realized for the purpose of offsetting decreases in air quality and mobility by providing alternatives to vehicular travel. Mitigation Measure TR-2.2 was developed to mitigate the SUMC Project’s traffic impacts at intersections. The following three intersections in East Palo Alto were analyzed:

- Woodland Avenue/University Avenue (intersection #17)
- Donohoe Street/University Avenue (#55)
- Bay Road/University Avenue (#54)

The Transportation Impact Analysis (Appendix C of the Draft EIR) indicates that the SUMC Project traffic would not result in a significant impact at any of the intersections in East Palo Alto. Therefore, there is no requirement for the SUMC Project sponsors to fund bike and pedestrian improvements in East Palo Alto as mitigation for traffic impacts at intersections.

7.30 The commentor states that the Lead Agency should amend TR-4.2 so that efforts to reduce motor vehicular travel are adopted in accordance with “best practices” to reduce public health concerns in the adjacent environmental justice community. Mitigation Measure TR-4.2 was developed to mitigate the SUMC Project’s traffic impacts at the Durand Way/Sand Hill Road intersection due to construction of a new road segment in that location. No new road segments are proposed in East Palo Alto as part of the SUMC Project and no local circulation impacts would be caused by the SUMC Project.

7.31 The commentor states that the Lead Agency should amend Mitigation Measure TR-6.1 so that funds are provided to reduce impacts associated with increased air pollutants and declining non-motorized mobility. Mitigation Measure TR-6.1 identifies measures for bicycle and pedestrian infrastructure improvements in the vicinity of the SUMC Project. As noted on page 3.4-76 of the Draft EIR, the intent of the improvements is to:

- reduce auto related traffic by providing the infrastructure for alternative travel modes;
- improve the bicycle and pedestrian linkages between the SUMC Project and Downtown Palo Alto, and between the SUMC Project and the surrounding residential neighborhoods; and
• mitigate the safety hazards to pedestrians and cyclists that would result from the SUMC Project related increase in vehicular traffic and congestion.

As noted, these measures would reduce auto-related traffic, and as such would also reduce vehicular air emissions. The measures would also improve the infrastructure allowing for more non-vehicular travel within the surrounding community.

7.32 The commentor states that the Draft EIR did not include the City of East Palo Alto free shuttle with a base ridership of 60,000 persons and that transit service to East Palo Alto should be expanded. Please refer to Master Response 2 for information on expanded shuttle service and the existing East Palo Alto Shuttle.

7.33 The commentor states that the Lead Agency should add a monitoring protocol that evaluates the impacts of increased congestion on East Palo Alto roadways and other surrounding roadways. Please refer to Responses 7.3 and 7.5 regarding traffic congestion in East Palo Alto and the potential for air quality impacts to sensitive receptors in these areas. Because the SUMC Project would not result in significant impacts related to traffic congestion and health effects in East Palo Alto, the addition of mitigation for a monitoring protocol would not be warranted.

7.34 The commentor states that the Lead Agency should add a mitigation measure to reduce TACs and the heat island effect. As noted in Response 7.3 and Staff-Initiated Change 3 of this document, the health risk analyses did not identify any significant health effects from TACs. In addition, the SUMC Project would not increase impervious surfaces compared with existing conditions, so no new heat island effect would occur. Further, the SUMC Project includes green roofs where feasible, which minimizes heat island effects. Therefore, no mitigation would be required to mitigate public health impacts or heat island effects associated with the SUMC Project.
The City of Menlo Park would like to take this opportunity to provide comments on the draft Environmental Impact Report (EIR) for the Stanford University Medical Center (SUMC) Facilities Renewal and Replacement Project.

The City of Menlo Park supports improvements to the SUMC facilities in the City of Palo Alto and recognizes the value that world-class medical facilities bring to the community. Nevertheless, concerns related to the current information provided in the draft EIR need to be addressed.

Menlo Park would like to engage in an open dialogue with the City of Palo Alto regarding this project and move forward to alleviate concerns related to it. However, additional information and further consideration of several issues is necessary for this project due to the impacts on the City of Menlo Park. The following items should be considered as terms of concern and thoroughly addressed before proceeding forward with the project:

A. Transportation

1) Numerous mitigation measures for improvements in Menlo Park: mention “fair share” contributions towards various improvements. These mitigation measures are also important in that they do not include cost estimates or indicate how the fair share will be calculated. Menlo Park is also unable to determine if these mitigation measures are adequate. Specific contribution amounts should be established and subject to adjustment for inflation. A fair share formula should be developed and discussed with Menlo Park prior to publication of the final EIR.

Menlo Park has used similar formulas for its projects and would propose the fair share to be as follows: project trips divided by the expected growth in trips from new to the project build out year would be the fair share percentage.

This percentage would be applied to current estimated construction costs adjusted for inflation to the year of construction.

A2) Mitigation Measure TR 1.4 Restrict Construction Hours. The draft EIR states that the SUMC shall be required to prohibit or limit the number of construction workers from arriving or departing the site from the hours of 4:30 PM to 6:00 PM. This mitigation measure should also include the hours of 7:00 AM to 9:00 AM. There should be enforcement mechanisms for the material delivery times and worker arrival and departure times outside the peak AM and PM hours. It is not indicated in the draft EIR where the off-site parking for construction workers will be located and how many shuttle trips would be required to bring the workers to the job sites.

A3) Mitigation Measure TR-1.8 Prepare and Implement Construction Impact Mitigation Plan. The draft EIR states that the SUMC shall submit a detailed construction impact mitigation plan to the City of Palo Alto for approval prior to commencing any construction activities. Since track routes are also through Menlo Park, the SUMC should also submit this plan to the City of Menlo Park for approval.

A4) Mitigation Measure TR-2.1 Install Traffic Adaptive Signal Technology. The draft EIR proposes the implementation of traffic adaptive signal technology as mitigation measures for El Camino Real between the northern city limits of Menlo Park to southern city limits of Palo Alto as well as for the intersection of Sand Hill Road with Santa Cruz Avenue. However, since the El Camino corridor in Menlo Park as well as Sand Hill Road and Santa Cruz Avenue are already operating on a traffic adaptive signal technology, this is not a mitigation feature. Palo Alto should require a fair share contribution towards the Menlo Park Transportation Impact Fee (TIF) fund.

A5) Mitigation Measure TR-2.2 Fund Additional Bicycle and Pedestrian Undercrossing. The draft EIR identifies constructing a new bicycle and pedestrian undercrossing near Menlo Avenue in Menlo Park as a mitigation feature. It is indicated that SUMC shall contribute its fair share to the construction of the Middle Avenue undercrossing in Menlo Park. The fair share contribution should be based on the formula as proposed by Menlo Park in A1).

A6) Mitigation Measure TR-2.3 Enhance Stanford University Travel Demand Management (TDM) Program. One of the initial enhancements to the TDM program that the draft EIR suggests is that SUMC should perform annual TDM monitoring and submit report to the City of Palo Alto. That same report should also be submitted to the City of Menlo Park for its review.

The TDM Program mitigation measure as currently proposed is inadequate because there is no enforcement mechanism to ensure that estimates trip reductions are actually achieved. This measure includes a reporting mechanism but currently does not require alternative TDM measures be implemented if the proposed measures prove to be ineffective. The TDM program relies heavily on the use of Caltrain GO passes as a way of reducing trips. The frequency of Caltrain service is currently in flux due to financial difficulties and will be uncertain over the life of the project. Transit services will inevitably change over the life of the project. Ideally new and better public transportation systems

2 of 9
will serve the project site. The TDM program should include flexibility to require
universal transit passes to whatever transit system serves the region.

Palo Alto should establish a specific trip limit for the project that ensures the estimates of
trip generation from the project are not exceeded and reductions from TDM measures
are actually achieved. The entire transportation section of the draft EIR relies on
estimates of future trips and includes trip reduction credits from the TDM program. If the
estimated number of trips is exceeded, other mitigation measures will fail to mitigate
impacts as proposed, in Menlo Park and Palo Alto. Fair share contributions towards
transportation improvements that are used in other mitigation measures will not be
calculated accurately if the actual number of trips exceeds estimates in the draft EIR.

The Mitigation Monitoring Plan should require annual traffic counts with specific daily trip
limits. It should be enforceable with requirements to supplement the TDM program as
needed to meet trip limits, or be subject to monetary penalties. Project phasing
requirements would be another potential enforcement mechanism that could limit the
square footage of future project phases if trip reduction targets are not met.

A7) Mitigation Measure TR-2.3 Enhance Stanford University Travel Demand
Management (TDM) Program. Another initial enhancement to the TDM program
suggested in the draft EIR is that SUMC should make arrangements to lease 75 spaces
at the Ardenwood Park and Ride Lot. It is not clear whether these are new parking
spaces. If not, are there 75 unused parking spaces that can be guaranteed for use by
SUMC employees? Otherwise, current users of the Ardenwood Park and Ride lot would
just be displaced to accommodate the SUMC employees.

A8) Mitigation Measure TR-2.5 Coordinate with Other Jurisdictions for Potentially
Feasible Roadway Improvements.

El Camino Real at Ravenswood Avenue The draft EIR determines that a traffic signal
adaptive technology implementation will make the project impacts at this intersection to
be less than significant. The draft EIR also identifies potentially feasible intersection
improvements for this intersection. Since this intersection is already operating on a
traffic signal adaptive technology, Palo Alto should require a fair share contribution
towards the cost of implementing the potentially feasible intersection improvements for
this intersection identified in this draft EIR, which are similar to the improvements
recommended in the Menlo Park TIF study.

Middlefield Road at Willow Road Even with the additional pedestrian and bicycle
 crossings and enhanced TDM, the project impacts at this intersection will remain
significant. Intersection improvements are also considered for this intersection but are
determined not feasible. The Menlo Park TIF has identified feasible alternative
intersection improvements that could alleviate the impacts at this intersection to less
than significant. Palo Alto should require a fair share contribution towards the cost for
implementing these improvements, estimated at $1,700,000.

Bayfront Expressway/Willow Road Even with the additional pedestrian and bicycle
crossings and enhanced TDM, the project impacts at this intersection will remain
significant. However, the draft EIR identifies potentially feasible intersection
improvements that will mitigate the project impacts at the intersection, similar to the
improvements identified in the Menlo Park TIF study. Palo Alto should require a fair
share contribution towards the cost of constructing these improvements estimated at
$470,000.

Bayfront Expressway/University Avenue Even with the additional pedestrian and
bicycle undercrossings and enhanced TDM, the project impacts at this intersection will
remain significant. Intersection improvements are also considered for this intersection
but determined not feasible. The Menlo Park TIF has identified alternative feasible
intersection improvements that could alleviate the impacts at this intersection to less
than significant. Palo Alto should require a fair share contribution towards the costs for
implementing these improvements, estimated at $2,500,000.

Middlefield Road/Ravenswood Avenue The draft EIR identifies potentially feasible
intersection improvements for this intersection. Palo Alto should require a fair share
contribution towards the cost of implementing the potentially feasible intersection
improvements identified in this draft EIR, which are similar to the improvements
recommended in the Menlo Park TIF, estimated at $1,520,000.

A9) Mitigation Measure TR-7.2 Provide Expanded Transit Service. The draft EIR states
that SUMC’s contribution to the Menlo Park shuttle bus services expansion shall be at
$0.105 per square foot of new development annually or a percentage agreed between
Menlo Park and SUMC. Menlo Park would propose the fair share percentage to be
calculated as follows: project trips divided by the expected growth in trips from now to
the project build out year. The $0.105 unit price should be adjusted for inflation to the
year of implementation of the shuttle service expansion.

In addition to Menlo Park shuttle bus service expansion, Palo Alto should require SUMC
to consider expansion of the Marguerite Shuttle services to Menlo Park. Service
enhancements to the Dunbarton Express buses should also be evaluated as a way to
reduce project trips.

A10) Mitigation Measure TR-9.1 Pay Fair Share towards Opticom Installation. The draft
EIR states that SUMC shall pay its fair-share financial contribution towards the City of
Palo Alto for the installation of Opticom at all significantly impacted intersections. This
mitigation measure should also include all significantly impacted intersections and
roadway segments in Menlo Park, specifically, on El Camino Real between Encinal
Avenue and Cambridge Avenue, on Sand Hill Road between I-280 and Santa Cruz
Avenue, and on Marsh Road between Bayfront Expressway and Bay Road. Palo Alto
should require a fair share contribution towards the installation of Opticom at these
impacted intersections and roadway segments.

A11) Although the DEIR states that Menlo Park’s Traffic Impact Analysis Guidelines
were used to analyze intersections and roadway segments in Menlo Park, it appears
there were significant deviations which would understate the amount of traffic on existing

4-88

Stanford University Medical Center Facilities Renewal and Replacement Final EIR —
Written Comments and Responses
道路。Menlo Park’s comment letter on the Notice of Preparation for the SUMC project (dated September 27, 2007) included a copy of Menlo Park Transportation Impact Analysis Guidelines. These guidelines require that traffic from planned and approved projects be added to traffic counts when performing the cumulative analysis. It does not appear that this was done. The traffic analysis should be updated. A list of planned and approved projects is available from our traffic engineer.

A12) Additional traffic analysis should be performed to evaluate the potential for increased trips between SUMC and Stanford’s Redwood City medical offices. Since all of the trips between these facilities will go through Menlo Park, the general trip distributions used for the traffic study may not accurately reflect this. The nature of trips between the facilities should be factored into the traffic analysis.

A13) The trip distribution used for the intersection of El Camino Real (ECR) and Cambridge Avenue in Menlo Park should be re-evaluated. The traffic analysis compared year 2026 traffic conditions with 2025 plus project conditions and indicated that in the PM peak hour trips on northbound ECR will increase from 2501 to 2606. However, the projections for the northbound ECR left turn movement to Cambridge remain constant at 280. The analysis fails to consider the high percentage of u-turns at this intersection. Many of the left turners actually make a u-turn and head southbound on ECR towards the project site.

A14) Comment A13 illustrates the traffic problem created by the limited turn movements at the intersection of Alma and ECR in Palo Alto. Traffic on Alma Street in Palo Alto, which is destined for the project site or other destinations via Sand Hill Road, is forced into Menlo Park. This creates added congestion and delay at ECR and Cambridge Avenue, increases emergency vehicle response times, and results in out of direction travel which increases greenhouse gas emissions. Additional traffic to and from SUMC will exacerbate these problems. Additional traffic modeling should be performed to evaluate conditions with full movement allowed at the ECR/Alma/Sand Hill Road intersection.

A15) Additional traffic analysis should be performed to evaluate whether trips will increase on Oak Avenue near Sand Hill Road, including the intersection of Oak and Sand Hill Road and tributary streets. Oak Avenue is a residential street that is sometimes used as a cut-through route to avoid congestion on Sand Hill Road. Motorists who want to avoid congestion on Sand Hill Road between ECR and Oak Ave (near the project site) can use Cambridge or Middle Avenue, then various routes through Menlo Park residential neighborhoods, and ultimately use Oak Avenue to reconnect to Sand Hill Road. Any increases in congestion on Sand Hill Road will make this a more attractive cut-through route. The EIR should evaluate this potential problem and develop specific mitigation measures that will prevent cut-through traffic in Menlo Park neighborhoods.

A16) The final EIR should include analysis of whether there are traffic impacts at the intersection of Willow Road and Durham Street in Menlo Park.

A17) The final EIR should include analysis of whether there are traffic impacts on Valparaiso Avenue in Menlo Park.

A18) The DEIR indicates that there would be a significant traffic impact on Alpine Road west of Juniper Serra Boulevard. However, the DEIR failed to adequately discuss potential mitigation measures that could mitigate the impact. Would road widening and/or added turn lanes at selected locations be effective? Would park and ride lots and shuttles from I-280 be effective? These or other mitigation measures should be considered for this roadway segment.

B. Housing

B1) Page 3.13-17, first full paragraph: Middle line quotes a number of 1,052 (just over 1) households above the 0.01 threshold representing the impact of additional housing needs. That number should actually be 1,052 (over a thousand). While it is shown correctly in Table 3.13-8 and elsewhere in the narrative, the casual reader might not catch the significance of the error here and assume a lesser impact than the authors are acknowledging.

B2) The report acknowledges that changes to the ratio of jobs to employed residents, used as the key to determining an impact on the housing market, are beyond the threshold of 0.01. The analysis shown in Table 3.13-9 shows a change of 0.05. The report also acknowledges that this impact is likely to be felt in Menlo Park, with a projected 53 units (Table 3.13-6) needed to house new employees given the housing pattern of the current workforce. While the report does not acknowledge, however, is that a significant portion of the residential areas of Menlo Park are within a closer proximity to the development site than most of the residential areas of Palo Alto. And a smart shopper will likely try to avoid high traffic commute patterns, which may direct them away from El Camino Real or significant travel along Sand Hill Road, both of which have significant traffic during commute hours. The housing needs analysis should include more information on housing need impacts in Menlo Park, given that residential neighborhoods in Menlo Park are closer geographically to the project than residential neighborhoods in Palo Alto. An increase of housing units to meet the demand may also create impacts to schools and park usage from increased population which should be analyzed in the final EIR.

B3) Areas of Menlo Park west of El Camino Real are likely to be the neighborhoods of choice for new employees who can afford the housing stock located there. These new employees will find, however, that the new housing development potential of these parts of Menlo Park is relatively low, which will most likely result in those employees bidding up the price of that housing, making it more expensive for all homebuyers looking to live in Menlo Park. This applies not only to single-family housing, but to multifamily housing as well. Some of the multifamily units located west of El Camino Real in Menlo Park currently house families associated with Stanford, whether student, faculty, or staff. An influx of lower income hospital staff will likely also bid up the price of that housing. The analysis should include information on the impacts of this effect on affordable housing in Menlo Park.
The provision of in-lieu fees to the City of Palo Alto will be of great benefit in helping them (the City of Palo Alto) combat the impact of this project on their housing market, but leaves Menlo Park to fund for itself. Some in Menlo Park will benefit from this impact as they sell their homes for inflated prices and move on to presumably lower cost housing markets. But overall, the impact is likely to be negative and last well into the future without some means of alleviating that impact within Menlo Park. The creation of new housing units as part of the project as contemplated in the Village Concept Alternative would be a good way to potentially mitigate housing impacts. If this alternative is not selected, other ways to address housing impacts in Menlo Park should be developed and considered.

C. Land Use

C1) On page 3.2-23, policy N-26 requires that the project support regional, state and federal programs that improve air quality in the Bay Area. The draft EIR concludes that because the policy does not prohibit a project from exceeding BAAQMD standards, the SUMC project complies with this policy. However, exceeding standards does not "improve air quality" and the EIR should more carefully consider compliance with this policy.

C2) On page 3.2-25, policy N-41 provides that the noise impact on existing residential land uses should be evaluated based on the following criteria and considered a significant degradation if the project causes an increase of 3 decibels or more in an existing residential area thereby causing the area to exceed 60 decibels. In considering compliance along Sand Hill Road, an existing residential area, the draft EIR concludes that the noise levels would rise by at least 8 decibels raising the noise level above 60 decibels. Nevertheless, the conclusion is that the project can be approved under this policy because it is below the 75 decibel maximum noise guideline. The conclusion appears inconsistent with the text of the policy and more consideration/analysis/explanation should be given to whether there is a significant impact on existing residences.

C3) On page 3.2-30, the draft EIR concludes that there is no conflict with residential, recreational, educational, religious or scientific uses. With respect to construction, the draft EIR justifies the no impact conclusion on the basis that the construction is temporary. However, twelve years of construction are planned with associated construction traffic and noise impacts. The draft EIR should not consider such a lengthy construction as temporary and should more fully consider the impacts on surrounding land uses.

D. Climate Change

D1) Page 3.6-21 concludes that because at the time of preparation of the draft EIR the Bay Area Air Quality Management District (BAAQMD) guidelines for quantitatively determining whether greenhouse gas (GHG) emissions are significant were not yet adopted and will not be retroactive that they need not be applied to the SUMC project. However, because the final EIR and the SUMC project have not been approved, the BAAQMD guidelines are applicable and should be employed to provide the decision maker with information as to whether this project will meet the BAAQMD threshold for large projects of 4.6 tonnes CO2e per service population per year. Evaluating the SUMC project for consistency with Palo Alto's Climate Protection Plan, which is five years old and does not consider reduction targets past 2020 (at least five years before the project will be complete) does not provide the decision makers adequate information on the project's climate change impacts. Accordingly, a quantitative analysis using the BAAQMD guidelines should be undertaken and the standards of significance should include consideration of whether this project meets or exceeds the BAAQMD threshold.

D2) In determining whether the SUMC project complies with Palo Alto's Climate Protection Plan policies, the draft EIR considers that the project would perform better than 90-95 percent of similar hospitals and would use 35 percent less energy than typical hospitals. It is unclear what this means in terms of emissions and how this is quantified. Furthermore, compliance with Palo Alto's Climate Protection Plan policies does not actually result in a reduction in emissions as the policies merely include tracking and reporting. Instead of mitigation measures that simply require auditing and reporting, the project should be required to comply with measurable and enforceable standards existing at the time of permitting.

E. Noise

E1) Section 3.7 of the draft EIR estimates that helicopter trips from the project will increase from 2,120 per year to 2,714 per year by the year 2025 (a 25% increase). Ambulance trips to the emergency department are estimated to increase from 23 trips per day to 39 trips per day (an increase of 70%). These increases in noise levels in sensitive residential neighborhoods north of the project site in Menlo Park. The draft EIR failed to evaluate whether impacts to Menlo Park residents would be significant based on the Menlo Park General Plan Noise Element. The draft EIR did find that noise impacts would be significant in Palo Alto (Page 3.7-35) but did not investigate or propose any mitigation measures to reduce the impacts. Additional work is needed to evaluate whether noise impacts are significant in Menlo Park. Additional work is also needed to identify mitigation measures for noise impacts. For example, could sound walls, landscape barriers, or additional trees be planted along Sand Hill Road to reduce helicopter noise? Can sound walls or sound insulating materials be placed at the helipad?

F. Project Alternatives

F1) The draft EIR considers a Village Concept Alternative that includes the provision of 490 low income housing units designated for employees in very close proximity to the SUMC. This alternative would reduce vehicle miles traveled, traffic congestion and vehicular air and noise emissions. Although these units were previously approved for graduate students and post doctoral fellows, one might expect that the use of this housing for employees would not simply result in a shift of trips (graduate students commuting rather than employees), but a reduction in trips as it is more likely a graduate student would choose to reside closer to the campus than employees who require lower cost housing and are willing to drive great distances for affordable housing. The draft EIR concludes that this alternative will have similar impacts to the project; however,
given the potential for reduction in commuting that would impact traffic and air quality/climate change, the EIR should make an effort to quantify the change in impacts that would result from the implementation of this alternative and re-consider whether it is environmentally superior to the project as proposed.

The City of Menlo Park requests consideration and cooperation to address the above mentioned items. The City of Menlo Park requests a response on the items described in this letter from the City of Palo Alto.

Sincerely,

Richard Cline
Mayor

cc: Members of the City Council
City Manager

8.1 The commentor expresses support for the SUMC Project. Please refer to Master Response 9 for a discussion of SUMC Project merit in the CEQA process.

8.2 The commentor requests to engage in open dialogue with the City of Palo Alto regarding the SUMC Project and moves to resolve all related concerns. The City of Palo Alto has engaged with the City of Menlo Park throughout the environmental review process. In particular, the City of Menlo Park reviewed the draft Transportation Impact Analysis (Appendix C to the Draft EIR) prior to inclusion in the Draft EIR. The City of Palo Alto has prepared responses to these comments, which are included in Response 8a. As of the preparation of this Responses to Comments document, the City of Palo Alto and its transportation consultant are conducting ongoing coordination efforts with the City of Menlo Park regarding the SUMC Project and its mitigation measures.

8.3 The commentor notes that the mitigation improvements contained in the Draft EIR need to include construction cost estimates and a determination of the fair share cost attributable to the SUMC Project. The commentor suggests that fair share be calculated as project trips divided by the expected growth in trips from now to the project build out year. Please refer to Master Response 6 for a complete discussion on the SUMC Project’s fair share contributions.

8.4 The commentor requests that Mitigation Measure TR-1.4, which limits the number of construction workers arriving and departing between 4:30 p.m. and 6:00 p.m., be expanded to include limitations between the hours of 7:00 a.m. and 9:00 a.m. and notes that the location of remote parking areas and the number of shuttles between the remote parking area and the project site for construction workers have not been identified. Please refer to Master Response 4 for the revised TR-1.4 on the arrival and departure hours of the construction workers. TR-1.1 of the Draft EIR stipulates that the remote parking area shall be provided with a shuttle bus to transport construction workers to and from the project site if adequate off-street parking for the construction workers cannot be provided. The SUMC Project sponsors are required to adhere to city and/or agency rules and regulations when determining the locations of the remote parking. The SUMC Project sponsors will coordinate the locations and shuttle frequency with the City of Palo Alto and, if located in other jurisdictions, with the jurisdiction where the parking would be located.

8.5 The commentor requests that the Construction Impact Mitigation Plan that the SUMC Project sponsor is required to submit to the City of Palo Alto also be submitted to the City of Menlo Park for approval, since truck routes also include Menlo Park streets. Please refer to Master Response 4 for the revised TR-1.8 regarding submission of a construction impact mitigation plan to Menlo Park.
8.6 The commentor notes that traffic-adaptive signal technology suggested in the Draft EIR for all Menlo Park intersections on El Camino Real and for the Santa Cruz/Sand Hill Road Avenue intersection has already been accomplished by the City of Menlo Park. As a replacement for this mitigation measure, the City of Menlo Park requests that the project contribute a fair share contribution towards the City’s Transit Impact Fee (TIF). Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contributions to Menlo Park. Also, please refer to Staff-Initiated Change 2 for revisions to the Draft EIR’s analysis to address existing traffic-adaptive signal technology in Menlo Park and to identify new locations for such technology.

8.7 The commentor notes that the Draft EIR identifies a fair share contribution to the construction of a bicycle and pedestrian undercrossing of the Caltrain tracks in the vicinity of Middle Avenue and that the fair share should be calculated in a manner consistent with Comment 8.3. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8.8 The commentor requests that the annual monitoring report on transportation demand management (TDM) measures also be submitted to the City of Menlo Park. Additionally, the commentor notes that the proposed TDM mitigation relies heavily on Caltrain GO Passes and by the time the SUMC Project is constructed, there may be considerable changes to transit along the Peninsula. Please refer to Master Response 1 for a discussion of the effectiveness of GO Pass and provision of the annual monitoring report to Menlo Park.

8.9 The commentor states that the City of Palo Alto should establish a limit on traffic that the SUMC Project cannot exceed and that if actual trips exceed the trip estimates in the Draft EIR, the mitigation measures would not achieve their intended effect. Please refer to Master Response 2 for a discussion of a No Net New Trips requirement and similar requirements based on traffic counts.

8.10 The commentor provides suggestions to include in the Mitigation Monitoring Plan; a requirement for annual traffic counting that is tied to daily limits, with enforcement required to increase TDM measures or face monetary penalties. Please refer to Master Response 2 for a discussion of a No Net New Trips requirement and similar requirements based on traffic counts.

8.11 The commentor notes that Mitigation Measure TR-2.3 requires the SUMC Project sponsors to lease 75 parking spaces at the Ardenwood Park-and-Ride lot and questions if these are new spaces or whether these would displace existing users. The Ardenwood Park-and-Ride lot was recently expanded from just over 100 spaces to about 350 spaces. Currently, approximately 40 of these spaces are vacant on a typical day. It cannot be determined at this time what the usage of this lot would be at the time the SUMC Project is constructed and occupied. However, the intent of this measure is not to displace other, existing users.
Please refer to Master Response 2 for a discussion on feasibility and effectiveness of other TDM measures.

8.12 The commentor requests that the SUMC Project provide a fair share contribution to the improvements at the El Camino Real/Ravenswood Avenue intersection which are contained in Menlo Park’s TIF study (City of Menlo Park’s 2009 Transportation Impact Fee Study Report) and which are consistent with the mitigation improvements noted in the Draft EIR. Please see Staff-Initiated Change 2 for a discussion of revisions to the intersection analysis. With implementation of higher priority mitigation, impacts at the El Camino Real/Ravenswood Avenue intersection would be reduced to a less-than-significant level and no roadway improvements at this location are required as mitigation for the SUMC Project.

8.13 The commentor notes that the Draft EIR identifies physical improvements at the Middlefield Road/Willow Road intersection but finds these improvements to be infeasible. The commentor further states that the City of Menlo Park TIF program identifies improvements at this intersection that the City of Menlo Park finds to be feasible, estimating the cost at $1,700,000, and states that the SUMC Project should contribute its fair share to the cost of these improvements. Please refer to Staff-Initiated Change 2 for a discussion of intersection impacts and Master Response 6 for a discussion on SUMC Project’s contribution. This intersection would not be significantly affected by the SUMC Project with implementation of higher priority mitigation measures. Nevertheless, the SUMC Project sponsors have offered funding for this intersection in their Development Agreement proposal.

8.14 The commentor notes that the Draft EIR identifies improvements at the Willow Road/Bayfront Expressway intersection and identifies these improvements as potentially feasible and estimates the cost to be $470,000. The commentor further states that the City of Menlo Park desires a fair share contribution from the SUMC Project to make these improvements. Please refer to Staff-Initiated Change 2 for a discussion of intersection impacts and Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8.15 The commentor states that the Draft EIR identifies improvements at the Bayfront Expressway/University Avenue intersection, which were considered infeasible. The commentor further states that the Menlo Park TIF has identified improvements at this intersection that the City feels are feasible, and the City desires a fair share contribution to the cost from the SUMC Project. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8.16 The commentor states the Draft EIR identifies a potentially feasible improvement at the Middlefield Road/Ravenswood Avenue intersection, similar to improvements noted in the Menlo Park TIF with an estimated cost of $1,520,000. The commentor suggests that the SUMC Project contribute its fair share cost of this improvement. The SUMC Project’s
impact at this intersection would be mitigated by enhanced TDM measures and additional bicycle and pedestrian undercrossing improvements. Therefore, a fair share contribution to the physical improvements at this intersection is not needed.

8.17 The commentor provides an alternative method for calculating the SUMC Project’s fair share payments. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8.18 The commentor suggests that the SUMC Project should be required to expand Marguerite shuttle service into Menlo Park and also make enhancements to the Dumbarton Express, provided by Santa Clara Valley Transportation Authority (VTA). Mitigation Measure TR-7.2 requires the SUMC Project to expand Marguerite transit service between the SUMC and PAITS and use reasonable efforts to assure that the transit service provider achieves a load factor of less than 1.0 on the U-Line. Further mitigation of transit impacts is not warranted. Please see Staff-Initiated Change 1 for a discussion of the SUMC Project transit trips. Because transit impacts would be less-than-significant, payment toward shuttle service in Menlo Park is no longer included in Mitigation Measure 7.2. Nevertheless, the SUMC Project sponsors have included such a payment in their Development Agreement proposal. Please refer to Master Response 6 for the calculation of the funding contribution.

8.19 The commentor requests that a fair share financial contribution for the installation of Opticom be required of the SUMC Project to all significantly impacted intersections in Menlo Park, specifically, on El Camino Real between Encinal Avenue and Cambridge Avenue, on Sand Hill Road between I-280 and Santa Cruz Avenue, and on Marsh Road between Bayfront Expressway and Bay Road. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8.20 The commentor states that the Transportation Impact Analysis is deficient in that it did not include traffic from planned and approved projects in the City of Menlo Park. Menlo Park requests that the Transportation Impact Analysis be redone. Please refer to Master Response 3 for a complete discussion on the Background Growth.

8.21 The commentor requests that additional traffic analyses be performed to assess the potential for increased traffic between the SUMC Project and Stanford’s Redwood City medical offices. The basis of the Transportation Impact Analysis for trip generation was the existing SUMC facility. Traffic counts were collected at the existing facility and trip generation rates were developed from those counts and the existing facility size. These rates were then used to determine the additional traffic generated by the expanded SUMC facility.

The clinics that were relocated to Redwood City are self-contained. Patients do not travel between Redwood City and Palo Alto for treatment. Some faculty members or researchers
may travel between the two sites on some days, but this is not expected to be frequent. The faculty tends to have clinic days and teaching days so they normally go to one facility or the other. The number of intercampus trips would likely be relatively small on a given day.

8.22 The commentor requests that the traffic analysis trip distribution be re-evaluated to reflect the fact that traffic uses the Cambridge Avenue/El Camino Real intersection to make a U-turn to access the project site because the traffic movement from Palo Alto Avenue to Sand Hill Road is not allowed. The Transportation Impact Analysis added one vehicle trip in the AM Peak Hour to this left-turn movement to reflect a U-turn. Most of the added U-turns that could occur at this location would happen during the AM Peak Hour when the SUMC Project creates mostly inbound traffic. However, if all of the inbound traffic traveling through Downtown North during the AM Peak Hour made this U-turn, the LOS at El Camino Real/Cambridge Avenue would still remain at LOS B. Therefore, a new significant impact would not result from this change. The Table 4-3 below shows the results of adding all project traffic through Downtown North making a U-turn at Cambridge Avenue. Please also see Staff-Initiated Change 2 for a revised analysis of intersection LOS impacts.

<table>
<thead>
<tr>
<th>AM Scenario</th>
<th>LOS</th>
<th>Avg Del (Sec)</th>
<th>Crit V/C</th>
<th>Avg Crit Del (sec)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>B</td>
<td>13.4</td>
<td>0.561</td>
<td>14.8</td>
</tr>
<tr>
<td>Existing + Project</td>
<td>B</td>
<td>15.4</td>
<td>0.616</td>
<td>17.6</td>
</tr>
<tr>
<td>2025 No Build</td>
<td>#6</td>
<td>El Camino Real / Cambridge Avenue</td>
<td>B</td>
<td>15.3</td>
</tr>
<tr>
<td>2025 with Project</td>
<td>B</td>
<td>17.5</td>
<td>0.742</td>
<td>21.8</td>
</tr>
<tr>
<td>Village Concept Alternative</td>
<td>B</td>
<td>16.9</td>
<td>0.727</td>
<td>21.0</td>
</tr>
</tbody>
</table>

Source: AECOM Transportation, 2011.

8.23 The commentor notes that the configuration of the El Camino Real/Sand Hill Road/Alma Street intersection causes some SUMC Project traffic to spill over into Menlo Park and requests additional traffic analysis be undertaken to evaluate the conditions if all traffic movements were permitted at El Camino Real/Sand Hill Road/Alma Street. The City of Palo Alto designed the El Camino Real/Sand Hill Road/Alma Street intersection as part of the Sand Hill Road Corridor Projects. Modifications to this intersection design were not identified as part of the SUMC Project. Any such modifications would be addressed through a separate process.

8.24 The commentor requests that additional analysis be undertaken to address potential project impacts on Oak Avenue, because some motorists use Oak Avenue to avoid traffic on Sand Hill Road and as traffic increases on Sand Hill Road as a result of the SUMC Project or
other growth in traffic, cut through traffic using Oak Avenue may increase. The Transportation Impact Analysis considered the possibility of cut through traffic in the West Menlo Park area. Several streets were evaluated, including Santa Cruz Avenue, Sharon Road, Stanford Avenue, Leland Avenue, and Vine Street. The Transportation Impact Analysis did not identify a significant impact on any of these residential streets in West Menlo Park. In response to this comment and others, daily traffic volumes were collected on Oak Avenue in September 2010. Using City of Palo Alto criteria, a significant impact would result if the TIRE index for a local or collector residential street increased by 0.1 or more. The existing TIRE Index for Oak Avenue is 3.4, the Future No Project TIRE Index is 3.4, and the Future With Project TIRE Index remains at 3.4. An increase of 650 daily vehicles is needed to trigger an increase in the TIRE Index. The SUMC Project would not contribute more than 100 daily trips (before mitigation). As such, the SUMC Project traffic would not cause a change in the TIRE Index. Therefore, the SUMC Project would not negatively impact Oak Avenue and this increase in trips would not constitute a significant impact according to the City of Palo Alto standards of significance.

8.25

The commentor requests that the Transportation Impact Analysis be expanded to include the intersection of Willow Road/Durham Street. In response to this comment, traffic volumes at the intersection of Willow Road/Durham Street were collected in September 2010. As shown in Table 4-4, the existing LOS was found to be B in the AM and PM Peak Hour. The 2025 No Project LOS would be B in the AM and PM Peak Hour. The 2025 with Project LOS would be B in the AM and PM Peak Hour. Therefore, the SUMC Project would not negatively affect the intersection of Willow Road/Durham Street, based on the criteria established in the Draft EIR. See also Staff-Initiated Change 2.

<table>
<thead>
<tr>
<th>AM Scenario</th>
<th>LOS</th>
<th>Avg Del (Sec)</th>
<th>Crit V/C</th>
<th>Avg Crit Del (sec)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>B</td>
<td>15.3</td>
<td>0.649</td>
<td>16.0</td>
</tr>
<tr>
<td>Existing + Project</td>
<td>B</td>
<td>15.4</td>
<td>0.687</td>
<td>18.1</td>
</tr>
<tr>
<td>2025 No Build</td>
<td>B</td>
<td>15.6</td>
<td>0.674</td>
<td>16.7</td>
</tr>
<tr>
<td>2025 with Project</td>
<td>B</td>
<td>15.8</td>
<td>0.711</td>
<td>17.4</td>
</tr>
<tr>
<td>Village Concept Alternative</td>
<td>B</td>
<td>15.7</td>
<td>0.70</td>
<td>17.2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PM Scenario</th>
<th>LOS</th>
<th>Avg Del (Sec)</th>
<th>Crit V/C</th>
<th>Avg Crit Del (sec)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
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<td>13.8</td>
<td>0.595</td>
<td>12.8</td>
</tr>
<tr>
<td>Existing + Project</td>
<td>B</td>
<td>13.7</td>
<td>0.608</td>
<td>13.0</td>
</tr>
<tr>
<td>2025 No Build</td>
<td>B</td>
<td>15.3</td>
<td>0.703</td>
<td>16.0</td>
</tr>
<tr>
<td>2025 with Project</td>
<td>B</td>
<td>15.3</td>
<td>0.716</td>
<td>16.3</td>
</tr>
<tr>
<td>Village Concept Alternative</td>
<td>B</td>
<td>15.5</td>
<td>0.723</td>
<td>16.6</td>
</tr>
</tbody>
</table>

Source: AECOM Transportation, 2011.
8.26 The commentor requests that the Transportation Impact Analysis be expanded to include potential traffic impacts on Valparaiso Avenue. The Transportation Impact Analysis considered the potential impacts on Valparaiso Avenue. As noted in Table 3.4-22: 2025 Roadway Average Daily Trips (ADT) Analysis, with Enhanced TDM and Additional Undercrossing on page 3.4-72, the project is not expected to significantly impact Valparaiso Avenue.

8.27 The commentor notes that the Draft EIR found that the project would have a significant impact on Alpine Road west of Junipero Serra Boulevard. The commentor questions whether roadway widening and/or added turn lanes would mitigate this impact or whether remote parking with shuttles or some mitigation measure would mitigate the impact. The Draft EIR found the impact on Alpine Road would be significant and unavoidable because the thresholds of the City of Menlo Park’s Roadway ADT were exceeded. It is noted that Menlo Park’s thresholds of significance for roadway segments are very conservative, as they are triggered in this case by an increase in ADT of 100 trips per day. As explained in the Draft EIR, this segment of Alpine Road is projected to experience an ADT of 25,120 without the SUMC Project, and 25,634 with the SUMC Project, an increase in 514 trips per day. With implementation of TDM mitigation measures identified in the Draft EIR (Mitigation Measure TR-2.3), the total ADT is expected to be reduced to 25,260. Thus, even with this mitigation, the increase in ADT is still 140 trips, 40 trips above the 100 trip threshold. Widening the road or adding turn lanes would not reduce the number of vehicle trips using this roadway, and thus would not reduce ADT or mitigate this particular impact – in fact, such improvements that increase roadway capacity might make Alpine Road a more desirable route and actually increase the number of motorists who use this roadway, thereby increasing the impact. The only way to further mitigate this impact would be to further reduce the number of trips added to this roadway. However, the TDM measures that are already proposed in the Draft EIR would already reduce the number of trips by 374, which is a 73 percent reduction. The implementation of additional TDM measures would have incrementally smaller effects, since there is a limit to the number of employees who would actually use alternate travel modes. For example, there would be a certain redundancy in requiring both use of GO Pass and use of remote parking and shuttles, since these TDM measures would largely compete with each other for the same users.

8.28 The commentor notes a punctuation error in the text. The text on page 3.13-17, third sentence of second paragraph, is revised as follows:

Table 3.13-11 converts the jobs to housing ratio to a jobs to employed residents per household ratio and shows that the SUMC Project would result in a total demand of approximately 1,303 new households in the region and \(4.052 \times 1.052\) households above the 0.01 threshold.

8.29 The commentor requests more information regarding housing need impacts in Menlo Park. Please see Master Response 7. Also, the SUMC Project would not include housing that
would generate students. As indicated on page 3.14-17 of the Draft EIR, the actual generation of new students would be a tertiary impact of the SUMC Project. As also indicated on page 3.14-17, the new residential development that may indirectly result from the increase in employment and that would generate students would be subject to separate CEQA review and would also be subject to residential school impact fees per SB 50. As a result, the tertiary demand for school services, including tertiary school demand in Menlo Park, would be less than significant. With regard to park use, please see Response 20.10.

8.30 The commenter requests an analysis of project impacts on affordable housing. Please see Master Response 7.

8.31 The commenter notes a negative impact on the housing market in Menlo Park. Please see Master Response 7 for a discussion of housing demand in Menlo Park. Also, the impact of a project on housing prices is not a physical environmental impact. See Master Response 10 for a discussion of non-CEQA issues.

8.32 As noted by the commenter, the Draft EIR notes that the project would exceed Bay Area Air Quality Management District (BAAQMD) CEQA significance standards. Policy N-26 states that the City should support programs that improve air quality in the Bay Area. While the project does exceed the BAAQMD CEQA standards of significance, the BAAQMD does not recommend denying approval for projects that would exceed these thresholds, but rather provides recommended mitigation measures to be implemented in order to reduce the emissions associated with individual projects. The SUMC Project sponsors’ TDM program, as well as Mitigation Measures AQ-1.1 and AQ-1.2, provided in Section 3.5, Air Quality, would be consistent with the BAAQMD’s recommendations for projects with a significant air quality impact. If the SUMC Project were approved, that approval would not indicate a lack of support for programs that improve air quality.

8.33 The commenter notes that there would be a significant noise level increase along Sand Hill Road. This impact is identified on pages 3.7-30 and 3.7-33 in the Draft EIR, and referenced in the policy discussion on page 3.2-25 regarding land use policy consistency. Policy N-41 provides guidelines for evaluating when a project would have a significant noise level increase. These criteria were used in Section 3.7, Noise, to evaluate the project’s impacts. However, as discussed on page 3.7-33 of the Draft EIR, while the Comprehensive Plan threshold is triggered, the Noise Ordinance Section 9.10.050 exempts noise associated with “emergencies” from its standards and penalties. The analysis included in Section 3.7 and referenced on page 3.2-25 conservatively includes ambulance noise in the noise calculations, even though this noise source would be considered exempt under the Noise Ordinance. In addition, as noted on page 3.2-25, the project would not exceed the City’s maximum noise guideline of 75 dBA, and as such would be within the City’s guidelines for conditionally acceptable uses.
The commentor requests more review under Impact LU-2 during construction since it would occur over a 12-year period. As stated on page 3.2-30 of the Draft EIR, Section 3.2, Land Use, a land use conflict would occur if a project, after construction, would significantly impede the function of surrounding uses. Therefore, since construction-period activities are not land use-specific and are temporary, these impacts are not analyzed as a land use impact under Impact LU-2.

However, construction-related impacts on the surrounding areas are analyzed by topic in their respective sections. Significant impacts that would occur as a result of the construction of the SUMC Project include temporary degradation of visual character (Impact VQ-1); traffic-related impacts (TR-1); cumulative traffic-related impacts (TR-10); criteria air pollutant emissions (AQ-1); cumulative emissions (AQ-6); cumulative toxic air contaminants (AQ-8); noise (NO-1); cumulative noise (NO-5); hazardous materials disturbance (HM-2); exposure to contaminated soil and/or groundwater (HM-3); cumulative hazardous materials disturbance (HM-12); and cumulative exposure to contaminated soil and/or groundwater (HM-13). Most of these construction-related impacts would be mitigated to a level of less than significant with the incorporation of mitigation measures. However, Impacts AQ-1, AQ-6, NO-1, and NO-5 would not be reduced to a less-than-significant level with mitigation, and therefore would result in a significant and unavoidable impact. Please refer to the respective sections in the Draft EIR for a full analysis of the construction-related impacts and a list of mitigation measures to reduce these impacts.

8.35 The commentor states that since the BAAQMD CEQA Guidelines have been approved, the Final EIR should use these guidelines as the significance threshold for the SUMC Project analysis. At the time of the CEQA analysis for the SUMC Project, thresholds of significance for greenhouse gas emissions did not exist. Therefore, as explained on page 3.6-25 of the Draft EIR and as required under the statewide CEQA Guidelines adopted in December 2009, the lead agency must develop its own significance criteria based on local conditions, data, and guidance from public agencies and other sources. As the Lead Agency, the City of Palo Alto has decided to use compliance with the City’s Climate Protection Plan as the significance criteria for the SUMC Project, which necessitates a reduction of 30 percent beyond business-as-usual emissions.

The commentor notes that the City’s plan extends only until 2020; however, the 30 percent reduction compared to Business As Usual (BAU) is consistent with the climate change goals adopted by the State of California. Further, much of the reduction achieved by the SUMC Project would be implemented immediately upon building occupancy, and would not be delayed until full buildout and full occupancy. The adoption of the BAAQMD CEQA Guidelines and a numerical threshold after publication of the Draft EIR for the SUMC Project does not supersede the City of Palo Alto’s authority to determine another
threshold. For consistency, the threshold chosen by the City and applied to the Draft EIR will remain as is and continue to be applied in this document.

8.36

The commentor states that it is unclear how the SUMC Project’s energy efficiency was used to determine the emissions reductions. Energy efficiency of the SUMC Project is detailed in Table 3.6-5 of the Draft EIR, page 3.6-31. As described, the energy efficiency measures results in a 30 percent reduction in energy usage for non-hospital buildings as compared to the 2004 Title 24 standard and a 15 percent reduction as compared to the 2008 Title 24 standards. The SUMC Project’s energy efficiency with respect to the hospital buildings has been re-evaluated based on Staff-Initiated Changes. Please see Staff-Initiated Change 4 (under the subheading “Energy Efficiency Rating of the SUMC Project”) for complete details.

Further, the commentor states that compliance with the Palo Alto Climate Protection Plan policies does not result in a reduction in emissions and that mitigation measures should be required to comply with measureable and enforceable standards. Mitigation Measure CC-1.1, as described on page 3.6-32 and page 3.6-54 of the Draft EIR, documents the commissioning of the energy systems for the new buildings. The systems commissioning would guarantee that the system has been designed to ensure that the energy efficiencies stipulated by the EIR are achieved. However, to clarify the commissioning procedures, Table 3.6-5 on page 3.6-32, first row, under the column titled “SUMC Measure” has been revised as detailed in Staff-Initiated Change 4.

While the Palo Alto Climate Protection Plan policies may not correlate with a quantifiable reduction in greenhouse gas emissions, the Draft EIR describes the design features associated with the Climate Protection Plan policies that would be implemented and result in a reduction of greenhouse gas emissions (as included in Table 3.6-5, pages 3.6-31 through 3.6-49, of the Draft EIR). Where the quantification of reductions is not possible, a qualitative discussion of compliance with the Palo Alto Climate Protection Plan policies is provided in the Draft EIR. Where quantifiable reductions are obtainable, these reductions are included in the quantification of greenhouse gas emissions in Table 3.6-8 on page 3.6-56. The SUMC Project emission reductions associated with compliance with the Palo Alto Climate Protection Plan were quantified based upon project-specific information. While it is understood that the non-quantified measures would reduce greenhouse gas emissions, their potential reductions are not included, and therefore, the Draft EIR as analyzed represents a conservative estimate of emissions.
8.37 The commentor states that the Draft EIR does not include evaluation of noise impacts to Menlo Park residents from helicopter and/or ambulance noise. The Draft EIR includes noise contours for existing and future noise levels with the helipad, as shown in Figure 3.7-3 and 3.7-5 of the Draft EIR. These contours include all the surrounding areas, including residents of Menlo Park. However, because noise levels from helicopters would be greatest for areas closest to the landing area, only impacts to residents closest to the site are discussed. Impacts to residents within the City of Menlo Park would be less than for those residents closest to the SUMC Sites, such as the residents at 1100 Welch Road. The helicopter noise would not result in a significant impact, so no mitigation pertaining to that source is required.

Ambulance noise would also be greatest for residents closest to the access points to the replacement SHC Hospital. Noise impacts identified in the Draft EIR from ambulance sirens are primarily related to the rerouting of ambulance routes onto Sand Hill Road between El Camino Real and Durand Way. These areas currently do not experience ambulance noise from the existing Hospital, and as such would have a significant increase in noise levels as a result of relocation of the Emergency Department (as discussed in Section 3.7 of the Draft EIR). The Draft EIR also shows that there would be no comparable project-related ambulance noise impact at the 1100 Welch Road apartments because this portion of Welch Road is an existing ambulance route and the ambulance noise impacts would occur here regardless of whether the SUMC Project is approved. This is also true for residents within the City of Menlo Park that are also near an existing ambulance route. The Draft EIR also notes that it is likely that more of the future ambulance trips would use the routes connecting with El Camino Real because the population density in areas along El Camino Real is higher than areas along I-280/Sand Hill Road.

The commentor asks whether mitigation such as a sound barrier could be designed to reduce the SUMC Project’s adverse noise effects. To reduce noise from ambulances, a barrier would need to be erected between Sand Hill Road and the residences located along Sand Hill Road from El Camino to Durand Way. To construct an effective barrier in this area, the barrier would need to be sufficiently high to block ambulance noise to the upper floor residents; this was considered to be infeasible. In addition, a sound barrier in this area could result in significant visual impacts. For these reasons, mitigation is not proposed.

8.38 The commentor requests a quantification of traffic and air quality impacts associated with the Village Concept Alternative. Please see Staff-Initiated Changes 4 and 8.

8.39 The commentor requests a response to the concerns raised in their letter. Please see Responses 8.1 through 8.38, above, for the responses prepared by the City of Palo Alto to the comments provided by the City of Menlo Park.
Comments on the Main Report:

1. On Figure 2-1a, Existing Intersection Geometry, there appear to be discrepancies in the lane geometry with the actual lane configuration as follows:
   a. Intersection #49, US 101 SB Off-Ramp at Marsh Road, the actual lane configuration shows the middle eastbound lane as a shared through and left turn lane (not exclusive left turn lane).
   b. Intersection #49, US 101 SB Off-Ramp at Marsh Road, the actual lane configuration shows the southbound middle lane as exclusive left turn lane (not shared right and left turn lane).

2. On Page 3-11, last paragraph, show Bayfront Expressway/Willow Road and Bayfront Expressway/University Avenue to be in Menlo Park.

3. On Page 3-47, Section 3-13, include that Menlo Park requires truck route permits for truck travel on Menlo Park streets.

4. On Section 4-1, Traffic Adaptive Signal Technology Modification, page 4-1, also indicate that the traffic signals on El Camino Real between Encinal Avenue and Quarry Road (ten signals) and the traffic signals at Sand Hill Road/Oak Avenue, Sand Hill Road/Santa Cruz Avenue, and Santa Cruz Avenue/Juniper Serra Blvd./Alpine Road (3 signals) are currently operating on a traffic-adaptive technology. LOS analysis for these intersections should, therefore, be modified to reflect these existing conditions ("intersection delay will be reduced up to 12%.")

   Add: The City of Menlo Park has identified the following corridors for implementation of a traffic-adaptive technology:
   a. Sand Hill Road between 1-280 and Santa Cruz Avenue (5-signals)
      (Continuation of adaptive system that currently operates the signals at Oak and at Santa Cruz Avenue on Sand Hill Road)
   b. Willow Road between Middlefield Road and Hamilton Avenue (6 signals)
   c. Marsh Road between Middlefield Road and Bayfront Expressway (7 signals)
   d. Middlefield Road between Willow Road and Oak Grove Avenue (4 signals)

5. On Section 4-2, New Pedestrian and Bicycle Under crossings, it was indicated that SUMC’s contribution to the construction of the Middle Avenue under crossing in Menlo Park should be tied to the amount of traffic added to the analyzed intersections by the project. This needs to be expanded or clarified as to how much of the contribution would amount to.

6. For Section 4-5, Intersection Improvements, attached is the Menlo Park’s recommended Intersection Improvements from its 2009 Transportation Impact Fee (TIF) Study. This would supersede the recommended intersection improvements in the Menlo Park General Plan. Additional comments on Table 4-4 are as follows:
   a) Bayfront Expressway/Willow Road (Intersection # 52) – In conjunction with the Menlo Gateway development project, the City is currently negotiating with the developer for a third EB right turn lane on Willow Road at Bayfront Expressway as project mitigation. This mitigation improvement is also

   indicated as “feasible” in Table 4-4 of the SUMC report. In the Menlo Park TIF study, the total cost to construct the third eastbound right turn lane on Willow Road was estimated to be approximately $470,000. However, there is uncertainty of when the Menlo Gateway development project will commence and consequently, when this mitigation improvement will be implemented as part of this project. As a condition of requirement, the City would like SUMC to consider implementing this mitigation improvement as part of its project if scheduling shows that the SUMC would be constructed prior to the Menlo Gateway project. In the event, though, that it appears that the Menlo Gateway would be completed first along with this mitigation measure, the City would like SUMC, instead, to contribute to the costs of a traffic signal adaptive technology on Willow Road between Hamilton Avenue and Middlefield Road. El Camino Real and Ravenswood Avenue, as recommended in the Menlo Park TIF study and also, Peninsula Gateway project.

   b) El Camino Real/Ravenswood Avenue (Intersection #3) – The City would like SUMC to consider contributing to the cost of adding a northbound through lane at the intersection.

   c) Middlefield Road/Willow Road (Intersection #18) – The Menlo Park TIF study recommend “feasible” improvements which the City would like SUMC to consider as potential mitigation measures and participate in the implementation costs. The costs for implementing these improvements were estimated to be $1,700,000.

   d) Bayfront Expressway/University Avenue (Intersection # 53) - The Menlo Park TIF study recommend “feasible” improvements which the City would like SUMC to consider as potential mitigation measures and participate in the implementation costs. The costs for implementing these improvements were estimated to be $2,500,000.

    e) Santa Cruz Avenue/Sand Hill Road (Intersection #30) – The City would like SUMC to consider participating in the costs of a traffic signal adaptive technology on Sand Hill Road between 1-280 and Santa Cruz Avenue.

7. On Section 4-11, Emergency Vehicle Access Mitigation, it was stated that Opticom should be installed at all intersections significantly impacted under the project scenario. Should be mitigation be in terms of emergency corridors or routes such as El Camino Real in lieu of individual intersections (El Camino Real at Ravenswood)? Will SUMC contribute to the Opticom installation?

Comments on the Village Concept-Alternative Analysis:

1. Based on the trip generation tables, the village concept SUMC would generate less traffic than the 2025 Full Build SUMC. It does not appear that the village concept SUMC is the preferred alternative. Why?
Chapter 3. Project Lists and Cost Estimates

In this project, LOS analyses were conducted for all signalized intersections (42 intersections) within the City of Menlo Park. At 15 of the study intersections, the future LOS is expected to be at unacceptable levels of E or F, after anticipated future growth has been added to the roadway network. At 11 of these locations, the LOS deteriorated to E or F as a result of the anticipated growth. These 11 locations were therefore candidates to be included in the TIF program for 100 percent funding. The four intersections that are currently deficient would be partially funded by the TIF program. The percentage of capital costs for each project that is expected to be paid by new development is based on the assumptions of a future development's perceived contribution to the need for a given project.

Recommended intersection improvements are shown in Table VIII and illustrated in Figure 5. The intersection improvements for Middlefield Road/Willow Road, El Camino Real/Rancho San Antonio Avenue, Bayfront Expressway/Willow Road and Bayfront Expressway/University Avenue will be partially funded by the TIF program.

Table VIII: Recommended Intersection Improvements

<table>
<thead>
<tr>
<th>No.</th>
<th>Intersection</th>
<th>Improvement Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>11</td>
<td>University Dr. &amp; Senta Cruz Ave.</td>
<td>Re-stripe NB exclusive RT lane to a shared left and Right Turn lane. Add a second WB receiving lane. Re-install the EB right turn offset.</td>
</tr>
<tr>
<td>13</td>
<td>Laurel St. &amp; Ralstonwood Ave.</td>
<td>Widened NB approach to include a left turn lane and EB approach to include a right turn lane. Re-stripe the existing EB shared through right turn lane to an exclusive through lane. Add a second NB left turn lane and re-install the EB right turn offset lane.</td>
</tr>
<tr>
<td>14</td>
<td>Middlefield Rd. &amp; Rancho San Antonio Ave.</td>
<td>Widened NB to add a second NB left turn lane and widen SB approach to include an exclusive RT lane. Re-configure the intersection to remove EB offset lane.</td>
</tr>
<tr>
<td>16</td>
<td>Middlefield Rd. &amp; Willow Rd.</td>
<td>Widened NB approach to include an additional through lane. Re-stripe the existing EB approach to include a left turn lane. Add a second SB through right turn lane to an exclusive through lane. Add a second SB left turn lane and re-install the EB right turn offset lane.</td>
</tr>
<tr>
<td>21</td>
<td>Buckman/Florence &amp; Marsh Rd.</td>
<td>Widened the existing WB approach to include an exclusive right turn lane (350 feet) and re-site the shared through right turn lane to an exclusive through lane.</td>
</tr>
<tr>
<td>25</td>
<td>El Camino Real &amp; Santa Cruz Ave.</td>
<td>Add a second SB through right turn lane to shared NB through right turn lane and SB to shared NB through right turn lane. Add a second SB left turn lane and re-site the shared through right turn lane to an exclusive through lane.</td>
</tr>
<tr>
<td>28</td>
<td>El Camino Real &amp; Rancho San Antonio Ave.</td>
<td>Widened EB approach to provide an exclusive left turn lane and a right turn lane. Add a second SB through right turn lane to shared through right turn lane. Add a second SB left turn lane and re-site the shared through right turn lane to an exclusive through lane.</td>
</tr>
<tr>
<td>30</td>
<td>El Camino Real &amp; Middle Ave.</td>
<td>Add an exclusive SB RT lane and widen WB approach to include an additional left turn lane.</td>
</tr>
<tr>
<td>33</td>
<td>Newbridge St. &amp; Willow Rd.</td>
<td>Widened Willow to add an exclusive EB right turn lane. Add a second WB through right turn lane.</td>
</tr>
<tr>
<td>37</td>
<td>Bayfront Expwy &amp; Willow Rd.</td>
<td>Widened EB approach to include an additional right turn lane. Add a second SB through right turn lane to shared through right turn lane.</td>
</tr>
<tr>
<td>38</td>
<td>Bayfront Expwy &amp; University Ave.</td>
<td>Widened SB approach to include an additional through lane and modify right turn only lane to be shared through right turn lane. Add a second SB through right turn lane.</td>
</tr>
<tr>
<td>41</td>
<td>Bayfront Expwy &amp; Chrysler Dr.</td>
<td>Add a second EB left turn lane and re-site the existing RT only lane to shared left turn and right turn lane.</td>
</tr>
<tr>
<td>42</td>
<td>Bayfront Expwy &amp; Marsh Rd.</td>
<td>Widened EB approach to provide an additional right turn lane.</td>
</tr>
</tbody>
</table>
City of Menlo Park, Rene C. Baile (Email dated April 1, 2010)

8a.1 The commentor states that the existing intersection geometry of the intersections of El Camino Real/Valparaiso Avenue (intersection #1) and Marsh Road/US 101 Southbound off-ramp (#49) needs to be updated in Figure 2-1 of Appendix C (Transportation Impact Analysis) of the Draft EIR. Figure 2-1 of Appendix C of the Draft EIR that shows the existing intersection geometry has been updated for intersections #1 and #49. The traffic analysis was also updated to reflect these changes. No new impacts resulted from the updated analysis. Please refer to Staff-Initiated Change 2.

8a.2 The commentor states that additional text should be added to page 3-11 of Appendix C of the Draft EIR, to identify the intersections that are located in Menlo Park (Bayfront Expressway/Willow Road (#52) and Bayfront Expressway/University Avenue (#53)). In response to the comment, lines 4 and 5 of the last paragraph on page 3-11 of Appendix C of the Draft EIR has been changed as follows:

- Bayfront Expressway/Willow Road (#52) (Menlo Park)
- Bayfront Expressway/University Avenue (#53) (Menlo Park)

8a.3 The commentor states that Menlo Park requires truck route permits for truck travel on Menlo Park streets. Please refer to Master Response 4 for additional information about truck route permits in the City of Menlo Park.

8a.4 The commentor states that traffic-adaptive signal technology has already been implemented at and is planned for several intersections. The intersection LOS analysis has been modified to account for updated information regarding traffic-adaptive signal technology. Please see Staff-Initiated Change 2 for a full discussion of these changes.

8a.5 The commentor states that the SUMC Project’s fair share financial contribution to the construction of the Middle Avenue under crossing in Menlo Park should be identified in the Draft EIR. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8a.6 The commentor states that the City of Menlo Park’s recommended intersection improvements from its 2009 Transportation Impact Fee (TIF) Study should supersede the recommended intersection improvements in the Menlo Park General Plan for the following intersections:

- Bayfront Expressway / Willow Road (intersection #52) - On the mitigation measure proposed for the Bayfront Expressway/Willow Road, the City of Menlo Park is currently negotiating with the Menlo Gateway developer for a third EB right turn lane on Willow Road. In the Menlo Park TIF study, the total cost to construct the third eastbound right turn lane on Willow Road was estimated to be approximately
$470,000. However, there is some uncertainty as to when the Menlo Gateway development project will commence or when this mitigation improvement will be implemented. As a condition or requirement, Menlo Park would like SUMC to consider implementing this mitigation improvement as part of its project if scheduling shows that the SUMC would be constructed prior to the Menlo Gateway project. In the event, though, that it appears that the Menlo Gateway would be completed first along with this mitigation measure, Menlo Park would like SUMC, instead, to contribute to the costs of a traffic signal adaptive technology on Willow Road between Hamilton Avenue and Middlefield Road, El Camino Real and Ravenswood Avenue, as recommended in the Menlo Park TIF study and also, the Peninsula Gateway project.

- **El Camino Real/Ravenswood Avenue (intersection #3)** - Menlo Park would like SUMC to consider contributing to the cost of adding a northbound through lane at the intersection.

- **Middlefield Road / Willow Road (intersection #18)** - Menlo Park would like SUMC to consider the improvements in the Traffic Impact Fee (TIF) for the intersection of Middlefield Road / Willow Road as feasible potential mitigation measures and participate in the estimated implementation cost of $1,700,000.

- **Bayfront Expressway / University Avenue (intersection #53)** - Menlo Park would like SUMC to consider the improvements in the TIF for the intersection of Bayfront Expressway/University Avenue (intersection #53) as feasible potential mitigation measures and participate in the estimated implementation cost of $2,500,000. Menlo Park would like SUMC to consider participating in the costs of a traffic-adaptive signal technology on Sand Hill Road between I-280 and Santa Cruz Avenue.

In response to the comment, Table 3.4-18 on pages 3.4-63, 64, and 65 of the Draft EIR has been updated to include the improvements from the TIF for intersections #52, and #53. In addition, no contribution to intersection improvements is necessary when the impact is less than significant (intersection #3) or where other mitigation reduces the impact to less than significant (intersection #18). Please see Staff-Initiated Change 2. In addition, please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.

8a.7 The commentor states that the proposed installation of Opticom as a mitigation measure for emergency vehicle access should be in terms of emergency corridors or routes such as El Camino Real in lieu of individual intersections (El Camino Real at Ravenswood). The SUMC Project would provide fair share contribution to the installation of Opticom at all study intersections impacted by the SUMC Project. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution.
The commentor states that, based on the trip generation tables, the Village Concept Alternative would generate less traffic than the SUMC Project and asks why it does not appear that the Village Concept Alternative is the preferred alternative. Please refer to Staff-Initiated Change 8 for a discussion of the traffic effect of Village Concept Housing.
Letter 9

TOWN OF PORTOLA VALLEY

July 21, 2010

Mr. Steven Turner, Senior Planner
Department of Planning and Community Environment
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301

Subject: Comments on the Final Environmental Impact Report,
Stanford University Medical Center Facilities Renewal and Replacement Project (SCH#2007082130)

Dear Mr. Turner:

Thank you for referring the DEIS regarding the Stanford University Medical Center Project to the Town of Portola Valley for review and comment. Our town council reviewed the DEIS at its meeting on July 14, 2010. The hospital project will have many impacts on the campus itself as well as surrounding communities, particularly Palo Alto and Menlo Park. It will, however, in addition have noticeable impacts on the Town of Portola Valley. The town council restricted its review to the impacts that will be of most importance to town residents.

We have identified three categories of impacts that are of most concern to the town: traffic congestion at intersections, traffic capacity of Alpine Road and the visual impacts on the Sand Hill Road corridor. We also have concern about impacts on housing demand and conformance with climate change requirements. Each of these categories are discussed below. In all instances our recommendations are shown in bold italics.

Traffic Congestion at Intersections

The DEIR identifies four intersections that impact Portola Valley residents each of which is discussed below. The data cited come from Tables 3.4-6 (existing traffic), 3.4 - 17 (projected traffic with and without the hospital project), 3.4 – 18 (mitigation measures).

Intersection 27 - Junipero Serra Blvd. and Alpine Rd. - Santa Cruz Ave.
This intersection currently operates at LOS C in both AM and PM Peak Hours, without the SMUC project the intersection will deteriorate to LOS D+ in AM Peak Hour and D in PM Peak Hours, and with the SMUC project will stay at D+ in the AM Peak Hour but deteriorate to D- in PM Peak Hour.

DEIR Mitigation - No improvements are proposed at this intersection, consequently PV residents will be faced with D+ LOS in AM Peak Hour and D- LOS in PM Peak Hour.

Intersection 30 - Santa Cruz Ave. and Sand Hill Rd. This intersection operates at LOS C- in AM Peak Hour and D+ in PM Peak Hour, without the SMUC project the intersection will deteriorate to LOS D- in AM Peak Hour and D in PM Peak Hour and with the SMUC project will stay at D in the PM Peak Hour but deteriorate to E in AM Peak Hour.

DEIR Mitigation - Intersection improvements are deemed “Not Feasible.” The intersection is described as “fully built-out” and that “improvements would be difficult to implement.” “Northbound Santa Cruz Avenue needs an additional right turn lane. The right-of-way requirements and cost of improvements make the improvements infeasible.” Accordingly, PV residents will be faced with LOS of D in the AM Peak Hours and E in the PM Peak Hours.

Recommendation - The DEIR states that the intersection of Santa Cruz and Sand Hill Rd., even with Adaptive Signal Technology “…would remain significantly impacted.” The DEIR also states that a right turn lane is needed on north-bound Santa Cruz but that it is not feasible. The DEIR should further investigate the feasibility of adding this turn lane and not simply conclude it is not feasible. Certainly an improved design is feasible and if so, the only issue is cost.

Intersection 62, IS 280 NB Off-Ramp and Alpine Rd. This intersection operates at LOS F in AM and PM Peak Hours and will continue at LOS F by 2025 with or without the SMUC project.

DEIR Mitigation - The DEIR recommends that Caltrans signalize this intersection. Table 3.4-1 incorrectly indicates the City/Jurisdiction as Palo Alto whereas San Mateo County has jurisdiction. Those people who travel on Alpine Rd. in the morning headed east of IS 280 toward Stanford and Palo Alto are surely aware of the backup on the north bound off ramp from the freeway. It appears there will be considerable pressure to install a traffic signal to ease that situation. It is not clear how much of the Alpine Rd. – IS 280 intersection would need to be signalized. Signals at this location would significantly affect the visual pleasure of those headed to Portola Valley but at the same time might help ease PM traffic congestion for those traveling west from the Alpine Rd. – Junipero Serra Blvd. intersection with the off and on ramps of IS 280.

Recommendation - While the DEIR recommends signalizing the intersection of the north-bound off ramp from IS 280, there is no description of how that would be designed. At least a preliminary design should be included that would clearly show how the on and off ramps on both sides of the freeway would be affected as well as how the through traffic on Alpine Road would be affected. Without this design, there is no adequate way to judge its acceptability. Also, the DEIR should be corrected to indicate the intersection is in unincorporated San Mateo County and not in Palo Alto.

Intersection 63 - IS 280 SB Off-Ramp and Alpine Rd. This intersection operates at LOS F in AM Peak Hour and C in PM Peak Hour, without the SMUC project LOS will not change and with the SMUC project, the AM Peak Hour will remain at F and the PM Peak Hour will deteriorate to D.
**Recommendation** — In order to ensure public participation in the review of the design, the EIR should include provisions for review of the final or near final design as a part of the EIR or subject the final design to a separate CEQA analysis.

**Impacts on Housing Demand**

The DEIR notes that there will be a 23% increase in full-time equivalent employees over the 2007 number. The DEIR recognizes this increase but then states that "...the percentage of regional housing demand resulting from the SUMC Project would be relatively small in comparison with projected housing growth in the region, and would comprise a less-than-significant environmental impact."

**Recommendation** — It is impossible that the increase in the labor force will not put a burden on nearby communities including Palo Alto, Menlo Park and possibly even Portola Valley. It also appears that Stanford should be required to provide some of this housing and that this should be evaluated in the EIR. This impact clearly needs more study.

**Conformance with Climate Change Requirements**

Climate change is addressed in Section 3.6 of the SMUC Project Summary of Impacts and Mitigation Measures. The project is gauged against the Goals and Policies of the Palo Alto Climate Protection Plan and specifically with respect to emitting "Significant Greenhouse Gas Emissions." With respect to Mitigation Measures, the DEIR states "...even with these measures the SUMC Project would contravene the goals in the City's Climate Protection Plan and would have a cumulatively considerable contribution to global climate change."

**Recommendation** — We question whether this issue has been adequately addressed given the lack of compliance with Palo Alto's Climate Protection Plan.

We appreciate the opportunity to submit the foregoing comments. We look forward to responses to our recommendations in the final EIR.

Sincerely,

B. Stephen Toben, Mayor

**Traffic Capacity of Alpine Road**

Those people who travel west on Alpine Road in the PM Peak Hour know that traffic can back up almost to the Junipero Serra Blvd. and Alpine Rd. - the Santa Cruz Ave. intersection.

**Recommendation** — This problem should be studied as part of the EIR.

**Recommendation** — Given that the traffic projections indicate AM Peak Hour at LOS F and PM Peak Hour at D, solutions to this problem should be included in the EIR.

**Visual Impacts on the Sand Hill Road Corridor**

The new hospital buildings will be by far the highest and most massive of any existing buildings along the entire Sand Hill Corridor from Santa Cruz Ave. to El Camino Road. They will dwarf all nearby buildings. The sense of the corridor as including considerable open space and of a consistent scale will change. The driver on Sand Hill Road will have a much more urban scale experience that is foreign to the locality. The plan of the hospital project shows four building segments, each reaching 130 feet. By comparison, the highest nearby building, the Children's Hospital, reaches only 50 feet. This is simply the result of trying to accommodate the floor area needs of the hospital while still trying to keep some open spaces between the buildings. This is not dissimilar to what happens in central city areas, such as in San Francisco, where there is a consistent push for more floor area on a limited amount of land. We are told by Stanford, however, that the trend is for hospitals to be built vertically for efficiency purposes.

The DEIR includes some visual simulations that help put the project in the context of the site and surrounding area. With respect to “Visual Quality” on pages S-27 to S-28, the Mitigation Measures spell out in some detail how the Architectural Review Board (ARB) will review and approve the final building plans. It is indicated that the ARB review will reduce visual impacts to a less than significant level because the ARB "...would address massing, layout, landscaping and architectural design impacts of the SUMC Project..." Under VQ-2.1 the DEIR states: "Architectural Review shall assess the appropriateness of proposed demolitions, proposed building heights and massing, siting of buildings and structures, architecture and façade treatments, landscaping, circulation plans and parking."

Also, under VQ-3 it is stated that the recommendations of the ARB are to be forwarded to the City Council for "consideration." Presumably, the final approval would be given by the City Council.

It appears that the project addressed in the DEIR is rather specific as to the amount of development to be allowed since it shows building outlines, locations and heights. Once the project is approved, it is not clear to what extent the scope of the project can be modified by the ARB and the City Council. If the scope is limited by what is described in the DEIR, that needs to be recognized in the DEIR. Subsequent changes by the ARB would then appear to need to be within that scope. In other words, the major decisions as to maximum bulk, etc. will appear to have been made prior the subsequent detailed review by the ARB and City Council. If the foregoing is accurate, then it is difficult to conclude that adequate design review has occurred as a part of the DEIR.

9.1 The commenter states that the intersection of Junipero Serra Boulevard/Alpine Road/Santa Cruz Avenue (intersection #27) operates at level of service (LOS) C without the SUMC Project and deteriorates to LOS D with the SUMC Project traffic added, but, no improvements for this intersection are contained in the Draft EIR. The commenter suggests that a free right turn lane for traffic from Santa Cruz Avenue onto Alpine Road, which was previously available, may need to be restored. The Transportation Impact Analysis (Appendix C of the Draft EIR) did not identify a significant impact for the SUMC Project at this intersection. The intersection operates at LOS D both with and without the SUMC Project. Therefore, the SUMC Project would not result in the deterioration in LOS and no improvements would be warranted. As part of a separate process, this intersection could be evaluated and the right turn lane restored if the traffic analysis indicated it is warranted and a funding source is identified.

9.2 The commenter states that the LOS at the intersection of Santa Cruz Avenue/Sand Hill Road (intersection #30) would change from LOS D in the AM Peak Hour without the SUMC Project to LOS E with the SUMC Project and suggests that the Draft EIR should further evaluate this intersection. The Transportation Impact Analysis for the Draft EIR followed a structured process. First, the traffic operations analysis was completed to determine if any significance thresholds were exceeded when SUMC Project traffic was added to the future No Project condition. If so, intersection improvements were identified to mitigate those impacts. A significant impact was determined to occur at Sand Hill Road/Santa Cruz Road because of SUMC Project traffic. The right turn lane was determined to be the appropriate physical improvement mitigation measure, but field observation determined that this physical improvement would be difficult to accomplish. Therefore, the analysis process evaluated traffic-adaptive signal technology, bicycle and pedestrian undercrossings, and travel demand management (TDM) strategies (Mitigation Measures TR-2.1 through TR-2.3, respectively) to determine if these measures would mitigate the SUMC Project impact at this intersection. As noted on page 3.4-61 of the Draft EIR, these three mitigation measures would eliminate the traffic impact at Sand Hill Road/Santa Cruz Avenue without the need for physical improvements.

9.3 The commenter states that details of the signal design at the northbound off-ramp from I-280 at Alpine Road (intersection #62) are not provided and it cannot be determined how the signal would affect through traffic on Alpine Road. The Transportation Impact Analysis for the Draft EIR found that the SUMC Project would cause a significant impact at the northbound I-280 off-ramp intersection at Alpine Road. The Transportation Impact Analysis also identified signalization as a potentially feasible mitigation measure. However, prior to making physical improvements, other mitigation measures were tested. These measures, including traffic-adaptive signal technology, bicycle and pedestrian improvements, and an expanded TDM program (Mitigation Measures TR-2.1 through TR-
2.3, respectively), were found to mitigate the SUMC Project impacts to a less-than-significant level and signalization of the intersection would not be necessary. In response to this comment, Draft EIR text on page 3.4-9, Table 3.4-1, has been revised as follows:

<table>
<thead>
<tr>
<th>Intersection #</th>
<th>Intersection</th>
<th>City / Jurisdiction</th>
<th>Source and Date of Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>62</td>
<td>I-280 NB Off-Ramp and</td>
<td>Palo Alto San Mateo</td>
<td>AECOM Transportation, October 2008</td>
</tr>
<tr>
<td></td>
<td>Alpine Road</td>
<td>County</td>
<td></td>
</tr>
<tr>
<td>63</td>
<td>I-280 SB Off-Ramp and</td>
<td>Palo Alto San Mateo</td>
<td>AECOM Transportation, October 2008</td>
</tr>
<tr>
<td></td>
<td>Alpine Road</td>
<td>County</td>
<td></td>
</tr>
</tbody>
</table>

9.4 The commenter notes that the intersection of the southbound off-ramp from I-280 at Alpine Road (intersection #63) would operate at LOS F in the AM Peak Hour and D in the PM Peak Hour with the SUMC Project and states that improvements to traffic operations at this intersection should be included in the Draft EIR. The SUMC Project would not significantly impact the southbound I-280 off-ramp intersection at Alpine Road because most of the traffic traveling to and from SUMC via I-280 would not use the southbound off-ramp at Alpine Road. For example, traffic coming from the north to SUMC would probably use the Sand Hill Road interchange instead of the Alpine Road interchange. Likewise, traffic coming from SUMC and traveling south on I-280 would probably use Alpine Road and the loop on-ramp to southbound I-280. While signalization of the I-280 southbound off-ramp at Alpine Road be warranted for existing reasons, the SUMC Project would not significantly impact this intersection and, therefore, this EIR for the SUMC Project does not identify such signalization as a mitigation measure.

9.5 The commenter notes that in the PM Peak Hour, westbound traffic on Alpine Road backs up to the Junipero Serra Boulevard/Alpine Road/Santa Cruz Avenue intersection (intersection #27) and that this condition should be evaluated in the Draft EIR. The intersection of Junipero Serra Boulevard/Alpine Road/Santa Cruz Avenue was evaluated in the Draft EIR and no significant SUMC Project impacts were identified. The intersection of Alpine Road with the northbound I-280 off-ramp was also evaluated in the Draft EIR and found to warrant the installation of a traffic signal. However, as noted in Response 9.3, above, other mitigation measures would reduce the SUMC Project’s impact to a less-than-significant level, so signalization would not be needed. If a traffic signal were installed as an improvement by San Mateo County and/or Caltrans, the traffic operations and queuing along Alpine Road would be improved.

9.6 The commenter expresses concern regarding the height of the proposed SHC Hospital building modules and how they will conflict with the overall visual character along Sand Hill Road. The following is a description of the SHC Hospital tower height, as explained by the SUMC Project sponsors. The Building Code itself does not specify the height or square footage of hospitals; these details are dictated by the hospital program envisioned by the SUMC Project sponsors in order to meet the future demands. As stated by the commenter, the SHC Hospital would need to be built vertically for efficiency purposes,
thereby requiring the heights as proposed. The upright alignment of the new SHC Hospital would allow for vertical circulation in the form of elevators, rather than requiring patients to move through lengthy public corridors. The immediate adjacency between the floors would organize patient movement privately and safely in the most efficient way possible through vertical transportation.\(^1\) In addition, Building Code ventilation and structural requirements result in a greater floor-to-floor height for a hospital than a commercial office building. The typical floor-to-floor height of an office building is 10-12 feet, while in a modern hospital it is 16-20 feet.\(^2\) As such, the height of the SHC Hospital building is necessary for the functionality of the hospital.

The SHC Hospital building would include five modules at 130 feet in height, which could degrade the existing visual character, resulting in a significant impact if not properly addressed through the City’s Architectural Review process. As described in the Draft EIR on page 3.3-40, the SUMC Project would alter some intermittent views along Sand Hill Road, but would not substantially change its character and visual quality. The Main SUMC Site, which would contain the 130-foot modules, is separated from Sand Hill Road by properties along Welch Road and the only direct views of the SUMC Sites are at the Pasteur Drive/Sand Hill Road intersection (as illustrated in Figure 3.3-9 for the SUMC Project and Figure 5-6 for the Tree Preservation Alternative). Due to the set-back from Sand Hill Road, the SUMC Project would not disturb the broad setbacks and rural, oak-dominated landscaping that characterizes this route.

In addition, as noted on page 3.3-29 of the Draft EIR, several buildings of similar height are located within the surrounding areas, including City Hall (127 feet), the Stanford University Hoover Tower (285 feet), and the Hoover Pavilion (110 feet). As such, the proposed building heights would be similar to existing massing in the area. Nonetheless, as outlined on page 3.3-39, Mitigation Measure VQ-2.1 would be implemented to reduce the impacts to visual character at the SUMC Sites. This mitigation measure would require the SUMC Project sponsors to adhere to the City’s Architectural Review process and would reduce the impacts to less than significant.

9.7 The commentor requests that the final or near final design of the project be subject to public review. The visual simulations and analysis in the Draft EIR is based on June 2009 site plans. As discussed on page 3.3-27 of the Draft EIR, SUMC Project design is still in progress and may continue to be altered. It is typical and acceptable for EIRs to address site plans as they are in process of being refined. However, the building program and envelope defined in Section 2, Project Description, of the Draft EIR are anticipated to remain constant.

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\(^1\) Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children’s Hospital, City Council Hearing, June 14, 2010.

As indicated in Section 3.3, Visual Resources, of the Draft EIR, adherence to the City’s Architectural Review process would ensure that impacts on on-site visual character and quality, and views, would be less than significant because the architectural review approvals would address massing, layout, landscaping, and architectural design impacts from the SUMC Project. The Architecture Review Board (ARB’s) recommendations regarding these factors will be forwarded to the City Council for consideration for approval. Architectural Review approval cannot be granted by the City Council unless the SUMC Project meets stringent criteria. As stated in Palo Alto Municipal Code Section 18.76.020, neither the Director, nor the City Council, shall grant Architectural Review approval, unless it is found that:

(1) The design is consistent and compatible with applicable elements of the Palo Alto Comprehensive Plan;

(2) The design is compatible with the immediate environment of the site;

(3) The design is appropriate to the function of the project;

(4) In areas considered by the board as having a unified design character or historical character, the design is compatible with such character;

(5) The design promotes harmonious transitions in scale and character in areas between different designated land uses;

(6) The design is compatible with approved improvements both on and off the site;

(7) The planning and siting of the various functions and buildings on the site create an internal sense of order and provide a desirable environment for occupants, visitors and the general community;

(8) The amount and arrangement of open space are appropriate to the design and the function of the structures;

(9) Sufficient ancillary functions are provided to support the main functions of the project and the same are compatible with the project’s design concept;

(10) Access to the property and circulation thereon are safe and convenient for pedestrians, cyclists and vehicles;

(11) Natural features are appropriately preserved and integrated with the project;

(12) The materials, textures, colors and details of construction and plant material are an appropriate expression to the design and function and whether the same
are compatible with the adjacent and neighboring structures, landscape elements and functions;

(13) The landscape design for the site, as shown by the relationship of plant masses, open space, scale, plant form, and foliage textures and color create a desirable and functional environment whether that landscape concept depicts an appropriate unity with the various buildings on site;

(14) Plant material is suitable and adaptable to the site, capable of being properly maintained on the site, and is of a variety that would tend to be drought resistant and to reduce the consumption of water in its installation and maintenance;

(15) The design is energy efficient and incorporates renewable energy design elements; and

(16) The design is consistent and compatible with the purpose of Architectural Review.

Please refer to Master Responses 10 and 11 for additional information regarding SUMC Project design.

9.8 The commentor recommends workforce housing. Please see Master Response 7.

9.9 The commentor questions the adequacy of the Climate Change analysis. The Draft EIR states that the SUMC Project would contravene the goals of the City’s Climate Protection Plan because the Draft EIR concluded the SUMC Project would not achieve a 30 percent reduction from Business as Usual (BAU) emissions.

Staff-Initiated Change 4 updates the greenhouse gas emissions inventory based on revisions to methodology used to estimate SUMC Project and BAU emissions associated with energy use and transportation. With the incorporation of the revisions to the greenhouse gas emissions analysis and mitigation, the SUMC Project would be in compliance with the City’s Climate Protection Plan. Details of the revisions to the climate change emissions inventories are detailed in Staff-Initiated Change 4.
July 27, 2010

Mr. Steven Turner
City of Palo Alto,
Department of Planning and Community Environment
250 Hamilton Ave
Palo Alto, CA 94301

RE: Comments on the Draft Environmental Impact Report for the Stanford University Medical Center Facilities Renewal and Replacement

Dear Mr. Turner

We support Stanford University and City of Palo Alto efforts to optimize the quality of the proposed Medical Center (SUMC) and all related planning decisions. We have a shared interest in considering the impacts to Palo Alto Unified School District (PAUSD) schools, to ensure a continuing high standard of service for future residents, employers, employees, and students.

As the report makes clear, SUMC project-related decisions will entitle over many years. Mitigations designed to reduce the jobs-to-employed-residents ratio that increase population and housing growth will increase student enrollment growth and impact the financial condition of PAUSD. These impacts will become clearer in the SUMC Development Agreement between the City and Stanford, and in updates to the Comprehensive Plan and Housing Element. We respectfully submit these questions on the draft Environmental Impact Report for the SUMC Project to understand the principles that will guide these project-related mitigation agreements:

1. Educational Services: 78% of PAUSD general fund revenue comes from local property and parcel taxes, unlike most California school districts, which receive state funding on a per-pupil basis. With regard to project-related mitigations, will all existing units in PAUSD be subject to property tax assessments? If there is property that doesn’t generate this standard local form of annual operating revenue for public school services, how will this negative impact be mitigated?

2. School Facilities: In the past, local developer fees have not covered the cost of expanding school facilities below serving growing enrollment. Local voter-funded bonds have paid for most of this added capacity, although at some point, existing school sites may reach capacity.

a. Enrollment Increases. Given the objective to “address project-induced school impacts not mitigated by school impact fees” (5.2 Project Objectives), and the suggested mitigations to promote additional housing (5.5 Impacts and Mitigation Measures), how would this objective be accomplished, particularly if the extent of new housing will require opening new schools?

b. Planning Efforts. The 2008 local voter-funded facilities bond program accounts for PAUSD facility needs based on the 5-year enrollment growth data and projections at that time. The report notes the cumulative development in the City can be expected to necessitate expansion of school facilities” to a projected enrollment increase of 3,800 more students by 2021, and the existing general obligation bond funds the facilities that will be needed to accommodate this growth impact. Although the EIR states that is Impact FS-3 that there is sufficient capacity for the projected increase of 73 students under existing conditions, the existing facilities plan is based on population growth projections that didn’t include SUMC project. Should PAUSD experience significant SUMC project-related enrollment growth beyond the payment of school impact fees established by SB 50, how would those planning and facilities expenses be mitigated?

3. Traffic Generation: The report comments the “expansion of school facilities could result in adverse environmental impacts,” but does not specifically comment on increased traffic generation on neighboring streets nor the impacts to the safe routes to school program. What are the projected environmental impacts and mitigations on PAUSD school sites?

4. Children’s Hospital School: With plans for 104 new inpatient beds at Lucile Packard Children’s Hospital (5.4 Changes Proposed), how will the staffing levels and expenses at the Children’s Hospital School be impacted, and how will PAUSD services be funded?

We look forward to your thoughtful review and response.

Sincerely,

Kevin Skelly, Ph.D.
Superintendent

10.1 The commentor asks if housing units within the PAUSD would be subject to property tax assessments. The SUMC Project does not include construction of new housing units. As such, this comment is inapplicable to the SUMC Project as proposed. However, the Village Concept Alternative includes a recommendation by the City that 490 previously approved housing units, which fall within the Palo Alto School District (PAUSD) service area, be dedicated to SUMC Project employees. As explained on pages 5-32 through 5-33 of the Draft EIR, all 490 have been analyzed under previous CEQA documentation, including the Stanford University 2000 Community Plan and General Use Permit (CP/GUP) EIR and the Sand Hill Road Corridor Projects (Sand Hill Road) EIR. The CP/GUP EIR determined that the housing developed under the CP/GUP would result in a potentially significant impact to public schools. The identified mitigation required that Stanford pay the statutory school impact fees for its housing development. As such, all of the housing that would be constructed under the Village Concept Alternative would be subject to school impact fees. In addition, if and when these units are constructed, regardless of who constructs or occupies the units, these units would be subject to property tax assessments by Santa Clara County, as required by State law; however, if built as rental units for students, faculty, or staff of the University or the SUMC, the units may qualify for an annual property tax exemption.

10.2 The commentor notes that local developer fees have historically not covered the cost of expanding school facilities to serve growing enrollment. As stated on page 3.14-17 of the Draft EIR, the SUMC Project would pay non-residential development fees subject to SB 50 School Impact Fees. According to Section 65996 of the State Government Code, payment of school impact fees is deemed to constitute full and complete mitigation.

As explained on page 3.14.17 of the Draft EIR, the SUMC Project would not directly impact enrollment and school capacity. Instead, the actual generation of new students would be a tertiary impact. The SUMC Project would increase employment, which could induce more housing, a secondary impact. Construction of additional housing units would generate more students, a tertiary impact. The new residential development that may indirectly result from the increase in employment under the SUMC Project would be subject to separate CEQA review and would be required to pay separate residential school impact fees.

The commentor also states that at some point, existing schools may reach capacity. The analysis in the Draft EIR for the SUMC Project is based on existing conditions, and not on future, projected capacity. As shown in Table 3.14-1, the additional capacity available in the PAUSD during the 2008-2009 school year was 457 students. Therefore, the tertiary
impacts of the SUMC Project on the PAUSD were based on this existing capacity information.

However, the Draft EIR also discusses the cumulative impacts of future development in the City. As stated on pages 3.14-23 to 3.14-24 of the Draft EIR, school facilities would need to be expanded to serve the projected increase in students plus additional students that were not accounted for in the projections. Therefore, an expansion of school facilities is assumed by 2025, which could result in adverse environmental impacts. However, as with the SUMC Project, the cumulative projects would be required to pay school impact fees, which are based on the amount of proposed residential and commercial space. Additionally, the SUMC Project would not directly contribute new students to the cumulative enrollment growth. The contribution of 73 students would not be a considerable contribution to the cumulative enrollment growth that is assumed to necessitate construction of new facilities, resulting in a less than cumulatively considerable contribution.

10.3 The commentor questions how the City plans to meet the objective of “address[ing] project-induced school impacts not mitigated by school impact fees” while the SUMC Project promotes additional housing. As explained on page 3.14-16 of the Draft EIR, the SUMC Project would have an impact on schools by indirectly generating up to 73 students. However, the existing capacity within the school district is 457 students; therefore, the SUMC Project would not directly or indirectly trigger the need for new school facilities. In addition, as discussed above in Response 10.2, the analysis in the Draft EIR states that with the school impact fee, the impact from the SUMC Project on the PAUSD would be less than significant. As such, the project-induced school impacts would be mitigated and no additional measures would be warranted under CEQA.

10.4 The commentor questions how the planning and facilities expenses would be mitigated if the SUMC Project-related enrollment growth extends beyond the payment of school impact fees established by SB 50. As stated in Response 10.2, above, payment of school impact fees is deemed to constitute full and complete mitigation. As such, no other mitigation is required.

10.5 The commentor requests an analysis of the environmental impacts and mitigations that increased traffic from the SUMC Project would have on schools. It is important to note that the discussion and analysis of traffic impacts are separate from the discussion and analysis of school impacts. According to CEQA, a proposed project would have an impact on schools if it increased enrollment to such an extent that new school facilities would need to be constructed, resulting in a significant environmental impact. That topic is addressed in Section 3.14 of the Draft EIR.

Section 3.4 of the Draft EIR, Transportation, examines the roadways and intersections that would be affected by the SUMC Project. All impacts from the SUMC Project to roadways
and intersections within the City of Palo Alto would be mitigated to less than significant with implementation of mitigation measures. Please refer to Section 3.4 of the Draft EIR for more information.

Additionally, the commentor mentions that the Draft EIR states that the “expansion of school facilities could result in adverse environmental impacts.” This statement is included on page 3.14-23 of the Draft EIR and is in regards to cumulative impacts, not project-level impacts. As discussed in the document, and in Response 10.2, above, cumulative development in the City could necessitate the expansion of school facilities; however, the SUMC Project’s contribution to this cumulative impact would be less than cumulatively considerable. In addition, it is important to note that the “adverse physical impacts” from cumulative development would occur due to the construction and operation of new school facilities, rather than the impact from the SUMC Project itself. Although these significant impacts could occur with the construction of new school structures, a separate CEQA review would be required for these potential future projects.

10.6 The commentor questions the staffing levels and expenses at the LPCH School under the SUMC Project. The current understanding between the PAUSD and the LPCH is that the PAUSD would continue to provide the existing level of school staffing, and the LPCH would provide the funds for the incremental staff required as a result of the SUMC Project. Nonetheless, the commentor’s concern is an issue outside the scope of CEQA. This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

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1 Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.
CPAU WGW will need a final copy of the PBS&J 2010 water and wastewater utility analysis quoted in table S-5 for our files.

CPAU needs the final analysis of the long-term utility and public infrastructure demand generated by the SUMC project (page 2-8).

CPAU will require a signed agreement regarding the existing emergency CPAU water interconnects with Stanford water including the activation conditions for these interties.

Add Utilities review to "Other City Approvals" on page 2-28/2-29 and add Utilities approval to section 2.8 page 2-62.

On page 3.3-22 add to Utilities section (third paragraph from bottom) locations shall comply with CPAU Rules and Regulations, and the Utility Standards.

Page 3.15-5 some statements under "Emergency Water Supply and Storage" (EWSS) are not accurate. The EWSS wells will be used only on an emergency basis and are not permitted to be used on a more frequent basis. Submit water CAD hydraulic analysis with assumption documentation for CPAU review and approval. Include the Water Demand calculations on page 3.15-18 in the water CAD analysis.
11. City of Palo Alto Utilities Department, Roland Ekstrand (letter dated August 2, 2010)

11.1 The commentor requests a final copy of the EIR for the Palo Alto Utilities Department (PAUD) files, along with the associated water and wastewater calculations. A Water Supply Analysis (WSA) was prepared for the SUMC Project and was adopted by the Palo Alto City Council on March 16, 2010. The WSA is provided as Appendix M to the Draft EIR. The City’s Planning and Community Environment Department will provide a copy of the EIR and records of wastewater calculations to the City of Palo Alto Utilities Department.

11.2 The commentor requests the final analysis of the long-term utility and public infrastructure demand generated by the SUMC Project. As stated on page 2-8 of the Draft EIR, one of the City’s objectives is to “provide for the long-term utility and public infrastructure demand generated by the SUMC Project.” Although the SUMC Project would increase the demand for public utilities during construction and operation, the City has made it a goal to provide the SUMC Project with the utility infrastructure that they need.

The analysis of this long-term utility and public infrastructure demand is included in Section 3.15, Utilities. As stated on page 3.15-18, the SUMC Project would result in a less-than-significant water supply impact because it would not result in the need for new or expanded entitlements for water supplies. The long-term horizon for this analysis is 2025, which is considered full occupancy of the SUMC Project. As such, the City would be able to meet its objective of providing long-term water supplies to meet the increased demand from the SUMC Project.

In addition, the SUMC Project would have less-than-significant impacts on wastewater, stormwater, solid waste generation, and energy demand at full occupancy in 2025. The SUMC Project would not trigger the need for the expansion or construction of new public infrastructure facilities. Therefore, the City’s objective of providing for the long-term utility demand generate by the SUMC Project would be met.

Please refer to Section 3.15, Utilities, for a more detailed analysis of the long-term utility and public infrastructure demand generated by the SUMC Project.

11.3 The commentor requests a signed agreement regarding the existing emergency City of Palo Alto Utilities (CPAU) water interconnects with Stanford water, including the activation conditions for these interties. As requested by the commentor, Stanford will provide the Utilities Department with the signed agreement separate from approval of the SUMC Project. This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Accordingly, no further response is necessary.
11.4 The commenter asks that “Utilities Review” be included under the subheading “Other City Approvals” in Section 2, Project Description, of the Draft EIR. The list of City approvals generally includes discretionary approvals requested as part of the entitlement process, and does not include reviews conducted by City departments, though the need for those reviews is acknowledged here. Consequently, the review by CPAU is not included on page 2-29 or 2-62. The list of “Other City Approvals” on pages 2-28 and 2-29 outlines the permits or approvals that the SUMC Project sponsors have requested.

11.5 The commenter requests an addition to the Utilities section. In response to this comment, the following text has been added to the first bullet point after subheader “Section 18.40.130” on page 3.3-22 of the Draft EIR:

- Utilities (e.g., transformer cabinets, pads, fiber optic trenching and above ground cabinets, large water check valves) and underground utilities shall not be placed within required landscaped areas, except where they will not preclude appropriate planting of trees and will be predominantly screened from public view. These locations shall comply with City of Palo Alto Utilities Department (CPAU) Rules and Regulations, and the Utility Standards.

11.6 The commenter states that there are inaccuracies under the discussion of Emergency Water Supply and Storage. The Draft EIR correctly assumes that Emergency Water Supply and Storage (EWSS) would be utilized only in multiple dry year events. As stated on page 2-11 of the WSA (Appendix M of the Draft EIR), the City has approved the EWSS, which provides the City with the ability to use groundwater for emergency purposes during multiple dry years. An EIR for the EWSS was prepared and certified by the City in March 2007. The commenter should refer to that separate EIR and its supporting technical studies for all analyses required to approve and implement the separate EWSS project.
Good afternoon-

The City Manager asked me to forward responses to Councilmember Holman’s questions on Item 14 prepared in coordination with Planning and City Attorney staff. Please let us know if you have any other questions.

Thank you-

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Question: Has Stanford formally changed their application to the tree Preservation Alternative?

Staff Response: Yes, on March 8, 2010, Stanford submitted Application Amendment No. 8 to clarify Stanford’s discussion of the Tree Preservation Alternative. The Tree Preservation alternative relocates and reconfigures the Main Hospital and FIM 1, while the other project components do not change from the original application. The amendment clarifies that the Tree Preservation alternative was the applicants’ preferred alternative and also indicated that they had stopped further design plans for the Main Hospital and FIM 1 as originally proposed and instead were pursuing more detailed design on the Tree Preservation alternative. Specifically, the March 8 Amendment provided: “This amendment contains additional information on the Tree Preservation Alternative. This information is being submitted as an amendment to the project application because the applicants intend to seek City staff, Planning Commission and Architectural Review Board review and consideration of the Tree Preservation Alternative in anticipation of potential final approval by the City Council. The alternative preserves several protected trees within the SUMC that otherwise would be removed by construction of the adult hospital and FIM 1. While we understand from our conversations with the City staff that the Tree Preservation Alternative would not reduce the tree removal impact to a less-than-significant level, the applicants believe that the alternative would substantially reduce the impact as compared to the proposed Project. Under this circumstance, if the Tree Preservation Alternative is found to fully accomplish the project objectives and to be otherwise feasible, then the California Environmental Quality Act will mandate its approval as compared to approval of the proposed project.”

6/14/2010
the main section apply?

Staff Response: Yes, the same mitigations in the main section would apply to the Tree Preservation Alternative.

Comment: As a note, the CMR does not make clear that 58 of the 71 protected trees would be removed.

Staff Response: There was a typo on page 5 of the Staff Report. In the original project, 71 protected trees (of a total of 176 on the site) would be removed. Under the Tree Preservation Alternative, 58 protected trees (of a total of 176 on the site) would be removed. Thus, the Tree Preservation alternative focuses on saving a total of an additional 13 of the most biologically and aesthetically significant trees.

Visual quality:

Question: I continue to have concerns about the ARB review occurring at this stage of the project and prior to entitlements. Additionally, in the absence of the FEIR, how can any body review to eliminate impacts (stated as numerous mitigation measures in the DEIR) as impacts and mitigation are not finally determined nor are the mitigations? Reliance on the DEIR or ARB review to mitigate impacts would appear to be premature to address the concerns not yet even stated by the HRB, PTC, Council or public.

Staff Response: Mitigation for design impacts is proposed through the Architectural Review process, which in this case includes review and recommendations by the ARB and Planning and Transportation Commission (PTC), and final review and action by the City Council. The schedule has been updated to clarify that the final ARB recommendation comes after certification of the FEIR (prior to entitlements) and that both the PTC and Council will review the final ARB recommendation with the Council taking the final action on entitlements. The Draft EIR is intended to review and propose mitigations to the project as proposed, not to determine whether the various entitlements and design should be approved.
12. Councilmember Karen Holman, City Council (letter dated June 14, 2010)

12.1 The commentor asks if the SUMC Project sponsors have formally changed their application to the Tree Preservation Alternative. As explained in the Staff Response, the SUMC Project sponsors submitted Application Amendment 8 on March 8, 2010 to clarify that the Tree Preservation Alternative is the SUMC Project sponsors’ preferred alternative. This amendment also indicated that they have stopped further design plans for the SHC Hospital building and the FIM 1 as originally proposed and instead are pursuing a more detailed site plan of the Tree Preservation Alternative.

Although the Tree Preservation Alternative is considered the SUMC Project sponsors’ preferred alternative, the SUMC Project as described and analyzed in the Draft EIR is considered the proposed project for the purposes of this document.

According to the analysis in Section 5 of the Draft EIR, Alternatives, most of the impacts would be the same under this alternative compared to the SUMC Project. However, exceptions include that the Tree Preservation Alternative would preserve more aesthetic tree resources than the SUMC Project (although still resulting in a significant and unavoidable impact); the Tree Preservation Alternative would result in less-than-significant construction criteria air pollutant emissions; the Tree Preservation Alternative would have greater significant and unavoidable noise impacts during construction due to pile driving; and the Tree Preservation Alternative could have less-than-significant impacts with mitigation regarding stormwater generation, runoff, and erosion due to the conservative assumption that there could potentially be more impervious surfaces. Please refer to pages 5-135 through 5-166 for a discussion and analysis of these issues and how the impacts under the Tree Preservation Alternative would differ from those of the SUMC Project.

Ultimately it will be up to the City Council to decide whether the Tree Preservation Alternative would reduce impacts as compared to the SUMC Project and whether to adopt it as the proposed project. It is at the discretion of City Council whether to approve portions of the proposed alternatives that would mitigate or avoid significant environmental impacts, while rejecting the alternatives that are deemed to be infeasible. As such, the Final SUMC Project could be the SUMC Project as proposed in the Draft EIR, an alternative to the SUMC Project (such as the Tree Preservation Alternative), or a combination of the SUMC Project and different alternatives. Please see Master Response 11 for more details about the review process.

12.2 The commentor states that Impacts BR-1, BR-3, and BR-4, in Section 3.9, Biological Resources, are not specific and do not properly address the impacts. As discussed in the Staff Response, the Draft EIR identifies impacted wildlife and plant species and the number of Protected Trees. Specifically, Table 3.9-1, on pages 3.9-3 to 3.9-10 of the Draft EIR, lists the special-status species potentially occurring on the SUMC Sites.
Impact BR-1 describes the significant impacts that the SUMC Project would have on special-status plant or wildlife resources. Although the impact statement is general, the more detailed analysis beneath the statement states that there would be a significant impact on special-status bat species and Cooper’s hawks. However, none of the other species listed in Table 3.9-1 would be impacted. As a result of the significant impacts on special-status bat species and Cooper’s hawks, Mitigation Measures BR-1.1 through BR-1.5 are required in order to reduce the impacts to less-than-significant.

Impact BR-3 explains that the SUMC Project would have no impact on the movement of any native resident or migratory fish or wildlife species, but could impede the use of native wildlife nursery sites, resulting in a significant impact. The analysis states that the SUMC Sites could provide nesting habitat for a wide variety of native birds, including non-special-status birds and raptors, which are protected by the California Department of Fish and Game (CDFG). However, the removal of buildings, trees, and shrubs would disrupt the nursery sites of these birds. Therefore, Mitigation Measures BR-3.1 and BR-3.2 are presented to reduce the impacts to less-than-significant.

Impact BR-4 includes an analysis of the Protected Trees at the SUMC Sites and states that implementation of the SUMC Project would have a significant impact on these trees. The Draft EIR defines Protected Trees as being coast live oaks or coast redwoods with specific diameters. In addition, the number of other tree species that were observed at the SUMC Sites is also provided. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced. In addition, the descriptions of Protected Trees to be removed and retained have been updated. Please refer to Staff-Initiated Change 6 for revisions to the mitigation measures and Protected Tree numbers.

In addition, please refer to Section 3.9, Biological Resources, of the Draft EIR for more analysis regarding impacts on special-status species, nursery sites, and Protected Trees.

12.3
The commentor expresses concern that Mitigation Measure BR-4.5 in Section 3.9, Biological Resources, only focuses on publicly-owned trees and not all Protected Trees at the SUMC Sites. Mitigation Measures regarding tree removal are presented on pages 3.9-26 through 3.9-28 of the Draft EIR. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced. As a result of these edits, tree replacement for loss of privately-owned Protected Trees is required under Mitigation Measures BR-4.4B. In addition, as included in the Draft EIR, tree replacement for loss of publicly-owned trees is included in Mitigation Measure BR-4.5. For the new Mitigation Measure BR-4.4B, please refer to Staff-Initiated Change 6 for revisions to the mitigation measures.

12.4
The commentor requests that financial contribution to the City’s tree fund be included as mitigation for trees lost to demolition at a rate based on the City’s regulations or as
determined by City Council. Mitigation Measure BR-4.4B, as outlined in Staff-Initiated Change 6, would require replacement for privately-owned Protected Trees in accordance with the Tree Technical Manual. The measure specifies that such replacement can be accomplished through payment to the City’s Forestry Fund. The SUMC Sites do not have sufficient space to accommodate all of the replacement trees that would be required under the replacement ratios specified in the Tree Technical Manual. Rather than reduce the ratios, payment into the Forestry Fund would enable trees to be planted throughout Palo Alto, which would benefit the urban tree canopy as a whole. Please refer to Staff-Initiated Change 6 for revisions to the mitigation measures as included in the Draft EIR.

12.5 The commentor asks what mechanisms allow the demolition of trees in violation of the City’s Tree Ordinance. As explained in the Staff Response, removal of Protected Trees would require an amendment to the City’s Tree Ordinance. The proposed mechanism developed in consultation with the City Arborist is an exception to be contained in the proposed new Hospital District zoning for the SUMC Sites. This exception would preserve the most aesthetically significant Protected Trees, while permitting the removal of others, provided certain mitigations are implemented.

As first described on page 2-28, Section 2, Project Description, the new Hospital District zoning ordinance would allow for the removal of the majority of the Protected Trees at the SUMC Sites while preserving the “aesthetic tree resources.” These trees are considered to be protected category oaks or redwoods per the Municipal Code and are trees that possess prominent features, contribute to a landscape theme, or possess unique character. The Hospital District zoning ordinance would include provisions for specific Protected Tree retention and preservation through development standards and regulations.

The Draft EIR introduces the proposed Hospital District zoning approach to preserve Protected Trees. However, as explained in Staff-Initiated Change 6, the number of Protected Trees has been corrected since the publication of the Draft EIR. For the updated Protected Tree numbers, please refer to Staff-Initiated Change 6. City Council would review the tree regulations as proposed for the Hospital District zoning during the entitlement review for the SUMC Project.

12.6 The commentor questions if the mitigations for removed trees for the SUMC Project also apply to the Tree Preservation Alternative. As discussed on page 5-153 in Section 5, Alternatives, Mitigation Measures BR-4.1 through BR-4.5 would apply to the Tree Preservation Alternative as well. Since the publication of the Draft EIR, the mitigation measures regarding tree removal have been revised and further enhanced, as outlined in Staff-Initiated Change 6. The revised tree mitigation measures would still apply to the Tree Preservation Alternative. However, these measures would not be able to avoid the removal of 59 Protected Trees (or the relocation of three biological and aesthetic tree resources) and therefore, even with the implementation of the mitigation measures, the
Tree Preservation Alternative would result in a significant and unavoidable impact. Please refer to Staff-Initiated Change 6 for the updated Protected Tree numbers and edits to the mitigation measures.

12.7 *The commentor questions the inconsistency between the number of Protected Trees to be retained or removed as outlined in the Draft EIR versus those outlined in the Staff Report that was prepared for City Council.* As discussed above, since the publication of the Draft EIR, the numbers of Protected Trees have been corrected. Please refer to Staff-Initiated Change 6 for the corrected Protected Tree numbers.

12.8 *The commentor has concerns about the City’s Architectural Review Board (ARB) process.* This comment pertains to the general process of certification and entitlements and not to the adequacy of the Draft EIR. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review.
Good afternoon,

The City Manager asked me to forward responses to Councilmember Shepherd’s questions on Item 4 prepared in coordination with Planning staff. Please let us know if you have any other questions.

Thank you.

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Question: There is a projected 2022 new jobs created by the SUMC project. Can you confirm that this includes the private sector employees. Private doctors renting office space at Hoover Pavilion, shopkeepers and rented spaces in the Hospital, etc.

Staff Response: The net new employment (projected at 2,242 employees per the Draft EIR) includes private medical doctors who would lease newly created space at SUMC, part-time SUMC employees, contracted nursing services, food prep staff, service staff, security staff, landscaping staff, and other similar staff. Specialized contractors needed on a project-by-project basis are not included in the employment figures.

Question: In the Planning minutes from 6-11, page 11: Mr. Struckeck says there is a table in Appendix H that lists the hospital employees and the city they are from. I cannot find that list, can you please direct me to this information with a page number.

Staff Response: The table referred to was Table 2 on page 8 of 14 in Appendix H of the Traffic Report. The Traffic Report is Appendix C of the EIR.

Question: What percentage of the University employees live on campus, and what percent of the hospital employees live on campus. Can this explain the commute difference of drive-alone commuters (77% university vs 54% hospital).

Staff Response: Very few (0.7%) of the total number of SUMC employees live within the Stanford zip codes. The City does not have zip code data for University employees. The primary explanation for the difference in drive-alone trips for the hospital (77%) and the University (54%) is that the University workers are provided free Go Passes and the hospital workers are not.

7/12/2010
13. **Councilmember Nancy Shepherd, City Council (letter dated July 12, 2010)**

13.1 *The commentor requests clarification on the number of new jobs.* The estimated new employment includes new SUMC employees and non-SUMC community health care provider employment. As indicated on page 8 of the Housing Needs Analysis (Appendix K of the Draft EIR), the estimated new employment accounts for new Hospital employees and non-SUMC community health care provider employment based on the additional space that would be made available for lease to community health care providers.

13.2 *The commentor asks the location of a table that lists the employees of the Hospitals and the city that these employees are from.* As explained in the staff response as shown in the City Council minutes of July 12, 2010, the requested table is Table 2 on page 8 of 14 in Appendix H of the Transportation Impact Analysis, which was prepared by AECOM. The Transportation Impact Analysis is included as Appendix C of the Draft EIR.

13.3 *The commentor asks how many SUMC employees and how many Stanford University employees live on the Stanford campus.* As presented in Appendix L of the Draft EIR, 93 Hospital employees live on the Stanford University campus, which is equivalent to approximately one percent. Table 3.13-8 on page 3.13-12 of the Draft EIR shows the existing employee distribution by zip code and the projected distribution of the SUMC Project at full buildout.

Approximately 1,046 Stanford University employees lived on campus in 2008. This represents slightly less than 10 percent of the total 11,000 campus employees. As of 2006, 1,769 employees, approximately 16 percent, lived in the City of Palo Alto.¹

*The commentor also asks why the drive-alone rates for University and SUMC employees differ.* As explained in the staff response, the primary explanation for the difference in drive-alone rates for the Hospitals (77 percent) and the University (55 percent) is that the University workers are provided free GO Passes and the hospital workers are not.

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¹ Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.
Thank you for getting these numbers. Does this mean that the University has had a 20% increase in staff (9,156 to 11,000) since 2004? Or does the employee count from table 2 of page 8 from appendix M in Appendix C not include employees that live on campus?

This makes me interested in more recent data than these transportation analysis offers (2004-2006). Is it available?

Nancy Shepherd
Council Member

-----Original Message-----
From: Brewer, Cathy
Sent: Mon 07/12/2010 4:23 PM
To: Burt, Patrick; Espinosa, Sid; Holman, Karen; Klein, Larry; Price, Gail; Scharff, Greg; Schmidt, Greg; Shepherd, Nancy (Internal); Yeh, Yiexy; Council Agenda Email
Cc: Minor, Beth; Keene, James; Baum, Gary; Williams, Curtis; Grider, Donna; Antii, Pamela; Emslie, Steve; Silver, Cara
Subject: CW Shepherd Agenda questions: Item #4: Stanford Transportation, Climate Change and Air Quality

Good afternoon-

The City Manager asked me to forward responses to Councillor Shepherd's questions on Item 4 prepared in coordination with Planning staff. Please let us know if you have any other questions.

Thank you-

-----------------------------------------------

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14. Councilmember Nancy Shepherd, City Council (letter dated July 12, 2010)

14.1 The commentor asks if Stanford University had a 20 percent increase in staff from 9,156 to 11,000 since 2006, or if the employee count in Table 2 of the Traffic Impact Analysis’ Appendix H (Appendix C of the Draft EIR) do not include employees that live on campus. Stanford University employment has not increased by 20 percent since 2006. Stanford University has 11,000 employees. The 9,156 figure in Appendix H of the Traffic Impact Analysis is the number of Stanford University employees who live in cities on the Peninsula that are served by Caltrain, between San Francisco and Gilroy.

The commentor also asks whether more recent transportation data are available. The EIR’s analysis is based upon data available at the time environmental review commenced. It would be impractical to collect new data, take new traffic counts, and update the traffic model repeatedly during preparation of the EIR.
Letter 15

Good afternoon,

The City Manager asked me to forward responses to Councilmember Shepherd’s questions on Item 4 prepared in coordination with Planning staff. Please let us know if you have any other questions.

Thank you,

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---Original Message---
From: Brewer, Cathy
To: Minor, Beth; Keene, James; Baum, Gary; Williams, Curtis; Grider, Donna; Antil, Pamela; Emslie, Steve
CC: Minor, Beth; Keene, James; Baum, Gary; Williams, Curtis; Grider, Donna; Antil, Pamela; Emslie, Steve; Silver, Cara
Subject: CM Shepherd Agenda Questions: Item #4: Stanford Transportation, Climate Change and Air Quality

Nancy-

Planning is researching this - it is not an easy response. Hopefully, we will be able to get something out this afternoon or at the meeting this evening.

Thank-Kelly

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---Original Message---
From: Shepherd, Nancy (internal)
Sent: Monday, July 12, 2010 3:37 PM
To: Morariu, Kelly; Council; City; Council Agenda Email
CC: Keene, James; Baum, Gary; Silver, Cara; Emslie, Steve; Antil, Pamela; Williams, Curtis; Grider, Donna
Subject: RE: CM Shepherd Agenda Questions: Item #4: Stanford Transportation, Climate Change and Air Quality

Can you tell me how many University employees live on campus?

I understand about the go-passes.

Nancy Shepherd
Council Member

---Original Message---
From: Morariu, Kelly
Sent: Mon, July 12, 2010 12:52 PM
To: Council; City; Council Agenda Email
CC: Keene, James; Baum, Gary; Silver, Cara; Emslie, Steve; Antil, Pamela; Williams, Curtis; Grider, Donna
Subject: CM Shepherd Agenda Questions: Item #4: Stanford Transportation, Climate Change and Air Quality

Good afternoon-

The City Manager asked me to forward responses to Councilmember Shepherd’s questions on Item 4 prepared in coordination with Planning staff. Please let us know if you have any other questions.

Thank you-

7/12/2010
Question: There is a projected 2022 new jobs created by the SUNY project. Can you confirm that this includes the private sector employees. Private doctors renting office space at Hoover Pavilion, shopkeepers and rented spaces in the hospital, etc.

Staff Response: The new employment (projected at 2,242 employees per the Draft EIR) includes private medical doctors who would lease newly created space at SUNY, part-time SUNY employees, contracted nursing services, food prep staff, service staff, security staff, landscaping staff, and other similar staff. Specialized contractors needed on a project-by-project basis are not included in the employment figures.

Question: In the Planning minutes from 6.11, page 11, Mr. Streecker says there is a table in Appendix H that lists the hospital employees and the city they are from. I cannot find that list, can you please direct me to this information with a page number.

Staff Response: The table referred to was Table 2 on page 8 of 14 in Appendix H of the Traffic Report. The Traffic Report is Appendix C of the EIR.

Question: What percentage of the University employees live on campus, and what percent of the hospital employees live on campus. Can this explain the commute difference of drive-alone commuters. (77% university vs 54% hospital).

Staff Response: Very few (0.7%) of the total number of SUNY employees live within the Stanford zip codes. The City does not have zip code data for University employees. The primary explanation for the difference in drive alone trips for the hospital (77%) and the University (54%) is that the University workers are provided free on buses and the hospital workers are not.
15. **Councilmember Nancy Shepherd, City Council (letter dated July 12, 2010)**

15.1 *The commentor asks how many Stanford University employees live on the Stanford campus.* Approximately 1,046 Stanford University employees lived on campus in 2008. This represents slightly less than 10 percent of the total 11,000 campus employees. As of 2006, 1,769 employees, approximately 16 percent, lived in the City of Palo Alto.¹

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¹ Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.
To: Curtis Williams
From: Greg Schmidt
Subject: Question on Stanford’s DEIR
Date: June 30, 2010

GOAL:
To understand the methodologies that are used to generate the traffic impacts of the Stanford University Medical Center in 2025.

PROBLEM:
The forecasted traffic data presented in the SUMC’s DEIR (Stanford University Medical Center Facilities Renewal and Replacement, Draft Environmental Impact Report, May 2010) seems to challenge common sense. Most of the intersections that are closest to major entry routes to the SUMC show substantial increases in traffic between 2005 and 2025 but the bulk of the increase seems to come from “other baseline traffic volumes” not from the SUMC project. To cite a few examples:

Table 1
CHANGES IN CRITICAL VOLUME TO CAPACITY RATIO (AM) 2005-2025

<table>
<thead>
<tr>
<th>INTERSECTION</th>
<th>2005</th>
<th>2025</th>
<th>2025</th>
<th>Percent due to SUMC</th>
</tr>
</thead>
<tbody>
<tr>
<td>#10: ECR/Univ-Palm</td>
<td>0.714</td>
<td>1.107</td>
<td>1.165</td>
<td>13</td>
</tr>
<tr>
<td>#11: ECR/Embar-Gal</td>
<td>0.729</td>
<td>0.853</td>
<td>0.875</td>
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<td>#20: Junipero/CampW</td>
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<td>#30: Santa Cruz/Sand Hill</td>
<td>0.900</td>
<td>1.067</td>
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<tr>
<td>#37: Arbuckle/Galvez</td>
<td>0.643</td>
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<tr>
<td>#42: Alma/Hamilton</td>
<td>0.503</td>
<td>0.590</td>
<td>0.618</td>
<td>24</td>
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<td>#59: Durand/Sand Hill</td>
<td>0.315</td>
<td>0.662</td>
<td>0.698</td>
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<td>#60: Durand/Welch</td>
<td>N/A</td>
<td>0.732</td>
<td>0.772</td>
<td>8</td>
</tr>
</tbody>
</table>

Source: DEIR, Tables 3-4.6 and 3.4-17

If I am reading these tables correctly, this seems to say that the SUMC project will account for only from 8% to 27% of the increased traffic in intersections close to the project. In the most questionable case it seems to say that in intersection #60 (Durand and Welch Road) an intersection that does not exist at the moment and will be opened to serve the SUMC, only 8% of the increase in traffic will be accounted for by the expanded project. Yet the project is expected to increase employment by 24% (DEIR, p. 2-48) and patient visits by 41% (DEIR, p. 2-47). Parking spaces on-site will increase from 932 to 2,985 (DEIR, p. 2-35). Yet all this added traffic activity in this site will account for only a small portion of the increased traffic leading to it. This leaves one with the question—Where does all the other new traffic come from?

SOURCES OF BASELINE TRAFFIC GROWTH—THE PALO ALTO MODEL

The ‘increased baseline traffic’ numbers were developed using the City of Palo Alto Travel Demand Forecast Model. This model is used to include “all of the growth in population and employment that is projected to occur between Existing Conditions and the year 2025” (DEIR, p. 3.4-33). Explicitly, though, the DEIR claims it “does not include the SUMC project.” In fact, the Palo Alto Model already includes several assumptions that decrease traffic counts in the noted intersections—Peak Hour Spreading (that pushes some through traffic on El Camino to I-280) and Constraints on Gateways (that keeps some traffic from exiting currently crowded Freeway exits).

What, then, accounts for the baseline traffic growth projections at the intersections noted above? The Palo Alto Forecast Model gets its growth forecasts assumptions from ABAG through the VTA. The starting assumption of the Palo Alto model states:

“This model was developed based on the Santa Clara County regional Valley Transportation Authority (VTA) travel demand forecasting model, with Association of Bay Area Governments (ABAG) projections of housing and employment data.” (DEIR, Appendix C, p. 3.1)

ABAG GROWTH MODEL

Thus, its the ABAG model that provides the crucial assumptions on ‘baseline growth’ to the Palo Alto Traffic Demand model. But ABAG does not so much forecast as allocate and distribute. Let’s look at how the ABAG model generates jobs and housing forecast. There are at least six steps to ABAG’s growth projections. These projections start with several state agencies:

1. The Demographic Research Unit of the California Department of Finance has a state-wide extrapolative cohort-based model that forecasts California Population Growth based on existing and projected births, longevity and migration patterns. Their long-term forecasts are based on a continuum of very long term historical trends and forecasts growth much like we have seen in past decades.

2. The California Department of Housing and Community Development takes the DOF’s population numbers and calculates the number and types of housing needed statewide to meet the projected growth in population (as well as new jobs to support that increased population). It allocates these statewide totals to regional Councils of Governments (ABAG being the representative Bay Area Council). The allocation formula is based on statewide goals that emphasize existing population concentrations, transportation goals and an improved intraregional relationship between jobs and housing.

3. Given a state-determined share of expected total state-wide population and job growth, ABAG then allocates these future numbers to cities and counties within the Bay Area through the Regional Housing Need Plan (RHNP). The RHNP Allocation process is based upon the current shares of jobs and housing with a housing premium given to communities with current job-housing imbalances and transit options.
4. ABAG projects future population, jobs, employed residents and new housing units by census tract. These projections are based on Census Bureau data on existing relationships and extrapolated into the future with modifications to achieve a more equal balance between jobs and housing while absorbing the population growth projected by the state. Thus ABAG is distributing the state’s population, jobs and housing forecasts provided by a statewide allocation formula.

5. Palo Alto has a unique role in the allocation process. Stanford University lands are included in Palo Alto’s sphere of influence. Because of the surplus of jobs to housing on Stanford lands, Stanford accounts for about 90% of the City’s sphere of influence jobs/housing imbalance (approximately 45k of the City’s 50k excess of daytime jobs over employed residents are on Stanford owned lands). Thus, Palo Alto’s baseline forecasted numbers include growth based on extrapolating from the existing job/housing ratios plus a housing premium to reduce current imbalances, plus a housing premium for its busy CalTrain stops.

6. The result is that the ABAG allocation already have embedded in them an extrapolation of existing relationships—that is, most new ABAG-extrapolated jobs will be in the Stanford core and in the professional and business services that grow with them (using the traditional multiplier effect that regional jobs provide). And most of the new housing will be in direct response to this job growth plus the re-enforced housing growth that comes from ABAG’s job/housing imbalance premium.

7. There are two longer-term identified sources for growth in the intersections near the SUMC project—the project itself and the expansion of the main campus toward Sand Hill Road. But since the main campus is under a ‘no net new trips’ agreement with the county, there should be little traffic generated from that source.

RESTATMENT OF CONCLUSION

Thus, the SUMC growth and its impact on the community around it is already embedded in ABAG’s numbers that underlie the Palo Alto Traffic Model. In fact, the Traffic Model has already been dampened by two key assumptions—‘the Peak Hour Spreading’ and ‘the Constraints on Gateways’—that net out some of the impact of SUMC.

This would seem to call for a restatement of the conclusions in the DEIR. The current DEIR concludes that:

“If the following four mitigation measures...were to be implemented together, they would completely mitigate the SUMC Project’s intersection impacts during the AM Peak Hour.”

(DEIR, p 1.4-65)

Actually it should read:

“If the following four mitigation measures...were to be implemented together, they would completely mitigate the SUMC Project’s intersection impacts during the AM Peak Hour except..."

16.1 The commentor questions the accuracy of the future traffic projections and questions the conclusion that only 8 to 27 percent of the traffic increases are associated with the SUMC Project. Please refer to Master Response 3 for a discussion on background growth and cumulative traffic impacts.

16.2 The commentor notes that the increased baseline traffic numbers were developed using the City of Palo Alto Travel Demand Forecast Model, but that the SUMC Project was not included in the base model. The commentor questions the method in which Association of Bay Area Governments (ABAG) assumptions have been incorporated into the City’s model. Please refer to Master Response 3.
Good afternoon,

The City Manager asked me to forward responses to questions on Item 4 (the EIR traffic analysis for the SUMC project) from the Mayor and Councilmembers Schmid and Shepherd prepared in coordination with Planning staff. Please let us know if you have any other questions.

Thank you,

Kelly McAdoo Moran
Assistant to the City Manager
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301
650-329-2952 office
650-325-5025 fax
kelly.moran@cityofpaloalto.org

Question: What is the comparative benefit (trip reduction) and cost of using the Clipper multi-transit pass to the GoPass from Caltrain?

Staff Response: The City's traffic consultant has evaluated the two transit pass approaches and has generally concluded that, so long as Caltrain ridership exceeds 10.3% of SUMC employees, the GoPass is the least costly option. The campus use of the GoPass is currently estimated at 15.8%, a figure used in the DEIR as an assumed benefit of the GoPass mitigation. A brief analysis of the two approaches is attached.

Question: The forecasted traffic data presented in the SUMC’s DEIR (Shafter University Medical Center Facilities Renewal and Replacement, Draft Environmental Impact Report, May 2010) seems to challenge common sense. Most of the intersections that are closest to major entry routes to the SUMC show substantial increases in traffic between 2005 and 2025 but the bulk of the increase seems to come from "other baseline traffic volumes" not from the SUMC project. To cite a few examples:

<table>
<thead>
<tr>
<th>INTERSECTION</th>
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</tr>
</tbody>
</table>

7/12/2010

7.2

17.3

7/12/2010

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
but has not been revisited. There is, however, a major Caltrans traffic signal upgrade planned for the El Camino/Embarcadero intersection in the next few months. Caltrans will be putting in protected left turns on the Galvez and Embarcadero approaches (all within the existing ROW, no widening). This will result in an 8-phase signal operation that will be more efficient and improve level of service.

Question: Is mitigation for traffic impacts in the City of Menlo Park included in our Development Agreement or elsewhere in the DEIR?

Staff Response: The physical roadway improvements are contained in Table 3.4-18 on page 3.4-63 to 65 of the DEIR, although some are noted as being "infeasible" mitigation. Menlo Park staff has indicated, however, that the draft EIR was published, that physical roadway improvements to the three affected Menlo Park intersections (Middlefield/Willow, Bayfront/Willow, and Bayfront/University) as described in the EIR are feasible. If these improvements are made, there would be no intersection impacts in Menlo Park. The final EIR will reflect this change to require contributions to the City of Menlo Park to assure these mitigation measures are implemented. When projects are located close to another jurisdiction it is common practice for the permitting city (Palo Alto) to impose conditions that would mitigate impacts in neighboring jurisdictions. This is generally done upon request of the neighboring city and upon agreement that the mitigation is feasible. The City has not yet determined how these mitigation measures will be implemented. The vehicle for implementing these measures may be as part of the Development Agreement or may be part of the conditions of approval for a Conditional Use Permit for the hospital (though SUMC opposes the imposition of a CUP process with the zoning).

__Clipper Transit Card__

The Clipper transit card, formerly known as TransLink, is a "cash card" that can now be used on Muni, BART, AC Transit, Caltrain, and Golden Gate Transit and ferry. Eventually, all of the following Bay Area transit agencies will also accept Clipper:
- Alameda/Oakland Ferry
- American Canyon Transit
- Benicia Breeze
- Cloverdale Transit
- County Connection
- Dixon Transit
- Fairfield-Suisun Transit
- Healdsburg In-City Transit
- Petaluma Transit
- Rio Vista Delta Breeze
- SamTrans
- Santa Clara VTA
- Santa Rosa CityBus
- Sonoma County Transit
- Tri Delta Transit
- Union City Transit
- Vacaville City Coach
- Vallejo Transit
- VINE (Napa County)
- WestCAT
- WHEELS and Yountville Shuttle

Each Clipper transit card is registered to an individual and employees can manage their transit benefits conveniently online with Clipper. For those who receive paper vouchers, commuter debit cards or reenter transit benefits online through another benefits provider, they can use the benefits to add value to the Clipper card.

- CommuterCheck®
- WageWorks®
- TransitPen®
- TransitCenter®
- eTrac®

It costs $5 to buy a Clipper transit card. For the initial period starting June 16, 2010, the Metropolitan Transportation Commission will be offering free Clipper cards, suspending the $5 card acquisition fee, for a limited time. This offer is available for a limited time and may be subject to change without notice.

__Go Pass__

The Caltrain Go Pass is an employer-sponsored annual pass that offers unlimited rides on Caltrain through all zones, seven days a week for one low annual cost. The Go Pass, currently a small sticker affixed to an employee photo ID badge, is purchased by employers for all of their regular, full-time employees. The Go Pass is not available for purchase by individuals and does not cover parking at Caltrain stations or travel on other transit systems. The Go Pass is valid for a calendar year and expires on Dec. 31 each year. Participating companies pay an annual fee (currently $140/year) to provide the Go Pass to each and every regular, full-time employee, regardless of how many will use the pass.

__Cost Comparison Scenarios__

The following table compares cost scenarios between the Clipper Transit Card and the Go Pass. The detailed calculations are attached. The following data and assumptions are included in the calculations:

- The future employment base at the hospital is 10,615 employees (provided by Sanford)
- The assumed mode split to Caltrain is 15.8% of employee trips (mode split percentage used in EIR calculations)
- The average number of Caltrain zones traversed by a commuting employee is 2 (captures all commuters from the Millbrae station on the north to the Tamien station on the south)
- Employees work 120 days per year (assumes 10 holidays and 20 vacation/sick days)
- 80 percent of employees work regular weekdays (weekday factor provided by Sanford's traffic engineer)

As shown on the following table and supported by the attached calculations, the annual cost of Go Passes for every employee is $1,486,000. The annual cost of daily Caltrain ridership for the 15.8% desired mode split to Caltrain is $2,209,211 assuming all riders buy a monthly pass. This cost would be reduced to $1,815,369 if only the 80 percent of employees working a typical weekday receive reimbursement of their Caltrain cost.

7/12/2010
# Annual Cost Comparison

<table>
<thead>
<tr>
<th>TDM Measure</th>
<th>Cost Per Year</th>
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<tbody>
<tr>
<td>Go Pass</td>
<td>$1,486,160</td>
</tr>
<tr>
<td>Clipper Card</td>
<td>$2,269,211</td>
</tr>
</tbody>
</table>

## Go Pass

- **Cost of GO Pass**
  - $140 / year today (Caltrain website, 2023)
  - (Caltrain website, 2023)

- **Total # of SAMSC employees at build-out**
  - 10,015

- **Cost of providing GO Pass for ALL employees**
  - $140 x 10,015

- **Annual Cost**
  - $1,486,160

## Clipper Transit Card

- **Assume usage**
  - 15.88% of 10,015

- **# of employees**
  - 15.88% x 10,015

- **Assume average travel zones**
  - 2

- **Cost of one-way trip**
  - $4.25 today

- **Cost of 2-way**
  - $8.50 (same as cost of GO Pass)

- **# of work days / year**
  - 230

- **Total cost of using Clipper Card**
  - $1,171 x $8.50 x 230

- **Annual Cost**
  - $53,278.367

  (This excludes cost of the Card @ $5 each)

If monthly pass is used instead of paying per trip, the cost would be reduced.

- **Cost of monthly pass within 2 zones**
  - $112.75 today

- **Total cost of using Clipper Card**
  - 112.75 x 230

- **Annual Cost**
  - $26,141.213

  (This excludes cost of the Card @ $5 each)

If reimbursement is only for weekday travelers, which constitutes 80% of the employees.

- **Total cost of using Clipper Card**
  - 80% x $2,269,211

- **Annual Cost**
  - $1,815,368.81

  (This excludes cost of the Card @ $5 each)
17. Mayor Patrick Burt, Councilmember Greg Schmid, and Councilmember Nancy Shepherd, City Council (letter dated June 30, 2010)

17.1 The commentors ask for the comparative benefit (trip reduction) and cost of using the Clipper multi-transit pass instead of the GO Pass from Caltrain. Either pass would be expected to attract the same number of ridership if the SUMC Project covered the cost. The decision to ride Caltrain by SUMC Project employees would be based on several factors, such as the cost to the employee, the location of their place of residence, and personal factors such as dropping children off at school on the way to work, etc. An evaluation of the two options shows that as long as Caltrain ridership exceeds 10.3 percent of Hospital employees, the GO Pass is the least costly option. The campus population’s use of the GO Pass was 15.8 percent in 2006, a figure used in the Draft EIR as an assumed benefit of the GO Pass mitigation.

17.2 The commentors question the accuracy of the future traffic projections and questions the conclusion that only 8 to 27 percent of the traffic increases are associated with the SUMC Project. Please refer to Master Response 3 for a discussion on background growth and cumulative traffic impacts.

17.3 The commentors question what studies have been prepared regarding improvements along Embarcadero Road between Alma Street and El Camino Real to improve traffic flow and safety and if the SUMC Project could be conditioned to study of this corridor. No significant impacts are identified for Embarcadero Road (after mitigation), so additional mitigations are not required by the EIR. Prior project environmental reviews have recommended improvements to Embarcadero Road or an increased number of turn lanes from El Camino Real onto Embarcadero Road, but have not been accepted by City Council as they would be inconsistent with Comprehensive Plan policies to protect the residential and neighborhood character of the road. A corridor study of Embarcadero Road evaluated the potential for roundabouts on the road, but the roundabouts were not implemented. The corridor study was part of a series of potential studies of residential arterials (Charleston/Arastradero, Middlefield, etc), which have not been revisited. There is, however, a major Caltrans traffic signal upgrade planned for the El Camino Real/Embarcadero Road intersection in the next few months. Caltrans will be putting in protected left turns on the Galvez Street and Embarcadero Road approaches (all within the existing right of way, without widening). These improvements would result in an 8-phase signal operation that would be more efficient and improve level of service. The Draft EIR assumed these improvements in its analysis of the Future Conditions both with and without the SUMC Project.

17.4 The commentors question whether mitigation for traffic impacts in the City of Menlo Park were included in the Development Agreement or elsewhere in the Draft EIR. Please see Staff-Initiated Change 2 for an updated discussion of intersection impacts in Menlo Park.
and corresponding mitigation measures involving fair share contributions towards traffic-adaptive signal technology, pedestrian and bicycle undercrossings, and roadway improvements in Menlo Park (mitigation Measures TR-2.1, TR-2.3, and TR-2.4, respectively). See Master Response 6 for a calculation of fair share contributions that the SUMC Project sponsors will make.
Hi, Curtis and Steven.

There were several references to the “future” Stanford Shopping Center expansion in the text of the visual provided in the last Council packet.

To what do these comments refer? By extracting the Stanford Shopping Center from the DEIR, is the document not inclusive of all anticipated impacts that are reasonably anticipated? Has consideration of such an expansion been revisited by the applicant?

In viewing the pedestrian and bike connections that are indicated in the DEIR, last night, and in the previously referenced inclusion in the last Council packet, are the connections that are represented intended to indicate the applicant’s intention to build the connections, indicate them anticipating that other entities will build them, or indicating they are possibilities with no certainty as to construction? To the extent that these may be considered mitigations to vehicle traffic, this information is relevant.

Traffic impacts analysis at the intersections of I-280 at Page Mill and 101 at Oregon appear to be inadequate. Traffic especially in the AM peak hours already heavily impacts these intersections. Increased traffic impacts due to the SUMC project can be reasonably anticipated and requires further analysis.

Thanks, Curtis.

Karen
18. Councilmember Karen Holman, City Council (letter dated July 27, 2010)

18.1 The commentor questions why the Stanford Shopping Center expansion was referred to as a future project in the City Council packet and if it is included in the analysis of the Draft EIR. As explained on pages 3.1-3 to 3.1-4 in Section 3.1, Environmental Analysis, the Stanford Shopping Center expansion is not considered a reasonably foreseeable project in the City and is, therefore, not included in the cumulative project analysis in the Draft EIR. As described in the Draft EIR, the Simon Property Group submitted an application in 2007 to expand the Stanford Shopping Center and construct a boutique hotel.1 However, this application was withdrawn in April 2009. Given Stanford University’s statement that it intends to focus its development efforts on the SUMC Project, and due to the current economic downturn and changing retail trends, the scope of any future development at the Stanford Shopping Center is too speculative to analyze at this point. As stated by Stanford, the Shopping Center expansion is no longer before the City for its consideration and there are no foreseeable plans, proposals, or programs in place that would bring the Shopping Center expansion back to the City for approval at a later time.2 Therefore, the Stanford Shopping Center expansion is not considered a probable future project for the purposes of the discussion of cumulative impacts, per CEQA Guidelines Section 15130. Nevertheless, some background traffic growth at the Stanford Shopping Center is assumed in the City’s traffic model, consistent with regional growth projections.

18.2 The commentor enquired as to whether the pedestrian and bike connections shown in Figure 3.4-10 on page 3.4-75 of the Draft EIR will be funded and built, and by whom. The new pedestrian and bike connections shown in Figure 3.4-10, within the SUMC Sites, would be funded and constructed by the SUMC Project sponsors as part of the SUMC Project.

18.3 The commentor states that, with regard to the traffic impact analysis at the intersections of I-280/Page Mill Road and at US 101 at Oregon Expressway, the SUMC Project could reasonably be expected to cause a significant impact on traffic. Both the northbound off-ramp intersection and southbound off-ramp intersection on Page Mill Road at I-280 were analyzed in Section 3.4, Transportation, of the Draft EIR. During the AM Peak Hour, the southbound off-ramp intersection is projected to operate at LOS F and the northbound off-ramp intersection is projected to operate at LOS E. However, the SUMC Project traffic would not result in a significant impact. Therefore, no mitigation is required from the SUMC Project. Traffic signalization would improve traffic operations at these two intersections. The Oregon Expressway and Embarcadero Road northbound ramps from US 101 contain very short weaving sections between the loop ramps. These short weaving

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2 Barbara Schussman, Bingham McCutchen LLP, Letter to Cara Silver, Senior Assistant City Attorney, April 16, 2009.
segments are a result of the outdated design of the interchange. The SUMC project is expected to add approximately 55 AM Peak Hour vehicle trips to this interchange without transportation demand management (TDM) mitigation and less than 10 vehicle trips with TDM mitigation (see Mitigation Measure TR-2.3, as revised in Master Response 1). While additional traffic would contribute to the poor weaving through the interchange, no improvement has been proposed to advance the traffic operations through this interchange. Therefore, there is no place for the SUMC Project sponsor to contribute a fair share contribution and, even if such an improvement were proposed, requiring the SUMC Project sponsors to fund the entire improvement with very minor traffic volume increases is beyond reasonable expectations for a single project.
Ruchita Kadakia

From: Karen Holman [kholman@sbcglobal.net]
Sent: Tuesday, July 27, 2010 4:45 PM
To: Turner, Steven
Cc: Williams, Curtis
Subject: Stanford DEIR

I believe this has been previously asked by others, but

Housing analysis:

Can the DEIR assumptions of housing demand resulting from the SUMC project
   a) be practically based on a 10% Palo Alto residency as a predictor?
   b) when ABAG does not use such calculations, but rather its own criteria as to jobs
      creation and housing demand?
   c) accurately analyze the physical environmental impacts of housing development in Palo
      Alto proper?

The analysis of amount of fill and distribution of fill from the project are under estimated.

There appears not adequate analysis of the toxicity levels of excavated fill
disposal/relocation.

Best,

Karen

19.1 The commentor questions the housing demand assumptions. Please see Master Response 7 for a discussion of the Draft EIR’s methodology of estimating the location of future employees.

The assumption that eight percent of SUMC employees would seek to live in Palo Alto is based on historical evidence, comprised of SUMC’s data on the residential distribution of their employees. As indicated on page 3.13-11 of the Draft EIR, the distribution of housing for SUMC Project employees is based on existing SUMC employee zip code data provided by the SUMC Project sponsors (see Appendix L of the Draft EIR).¹ No basis for a ten percent Palo Alto residency has been provided by the commentor; as such, the eight percent rationale is appropriate. Also, see Master Response 7 for a discussion of the criteria for determining the impact on the City’s jobs to employed residents.

Accurately analyzing the physical environmental effects of housing development in Palo Alto would require an identification of the housing sites, housing density at each site, and building mass of the housing at each site. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1. The 70 housing units at the Pasteur Drive/Sand Hill Road site under the Village Concept Alternative would fall within Palo Alto limits. These 70 units have been analyzed and environmentally cleared under the Sand Hill Road Corridor Projects EIR.²

19.2 The commentor states that the amount and distribution of fill is underestimated. The Draft EIR does not provide a quantified amount or distribution of fill under the SUMC Project. Sections 3.10, Geology, Soils, and Seismicity, and 3.11, Hydrology, of the Draft EIR identify the various federal, State, and local regulations that would apply to excavated soils and fill. As indicated in these sections, the required compliance with these regulations would ensure that impacts associated with excavated soils and fill would be less than significant.

19.3 The commentor requests information on the toxicity levels of excavated soil and the disposal location for such soils. Please see pages 3.12-10 through 3.12-20 of the Draft EIR for a discussion of the known levels of contamination based on previous site sampling conducted on the SUMC Sites. As noted on page 3.12-5 of the Draft EIR, the properties and health effects of different chemicals are unique to each chemical and depend on the extent to which an individual is exposed. As described on pages 3.12-40 through 3.12-41 of the Draft EIR, implementation of Mitigation Measures HM-3.2 through HM-3.4 would

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¹ Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.
² City of Palo Alto, Sand Hill Road Corridor Projects Final Environmental Impact Report, certified by the City of Palo Alto, July 1998.
remediate the potentially contaminated soils at 703 Welch and the Hoover Pavilion Site. Specifically, Mitigation Measure HM-3.2 calls for conducting soils testing for mercury, silver, and pH levels in the 4- to 9-square-foot area near every discharge point from the building located at 703 Welch. Mitigation Measure HM-3.2 calls for excavating, removing, and transporting contaminated soil to an approved disposal site (which would be in compliance with Occupation Safety and Health Administration [OSHA]). The SUMC Project sponsors would consult with the Santa Clara County Department of Environmental Health (DEH) on all results and remediation actions.

Additionally, Mitigation Measure HM-3.3 calls for conducting a soil excavation program at the Hoover Pavilion Site. Specifically, under Mitigation Measure HM-3.3, a qualified consultant would remove all underground storage tanks from the property; conduct additional soil sampling to the extent necessary; if warranted, excavate and remove contaminated soils; and prepare a Site Health and Safety Plan. Please refer to Response 2.2 for an additional discussion of these mitigation measures.
July 27, 2010

Steven Turner
Department of Planning and Community Environment

Re: Stanford University Medical Center Facilities Renewal and Replacement Draft Environmental Impact Report, SCH #2007082230

Dear Steven,

The Committee for Green Foothills ("Committee") submits the following comments on the Stanford University Medical Center Draft Environmental Impact Report ("SUMC DEIR", or "DEIR").

General Comments:

Length of review period. We are aware of complaints that the review period for this project is taking too long and is too close to the statutory deadline for seismic upgrades, and therefore further review should be truncated, no new mitigations should be requested, and Stanford's project should be approved without modifications. These objections fail to account for two reasons that are related to Stanford's own actions.

First, Stanford began the process much later than other hospital systems like the Santa Clara Valley Medical Center. This strategy by Stanford, of beginning a process late and then claiming their proposal needs to be approved as is because there's no time to change it, is an oft-used procedure. Stanford used the identical strategy for obtaining approval of its Sustainable Development Study from Santa Clara County, without incorporating any changes suggested by Palo Alto. Giving into this strategy is self-defeating, so neither the City nor the County should let Stanford's delay function as a reason for giving in to its demands.

Second, the review was delayed for a period when Stanford was given unannounced access to preliminary versions of the DEIR. This access contravenes a statement by the City several years earlier (which was the last that we had heard from the City) that the City would not share preliminary versions of DEIRs with applicants, a practice that biases the review process and gives applicants inappropriate opportunities to influence what is supposed to be a neutral evaluation. While exactly what happened is unclear, it appears Stanford took advantage of its access to argue for changes in the DEIR that delayed its publication. Again the fault for delays lies with Stanford (although also in part with the City for its mistaken decision). These delays do not justify short-changing environmental review.

DEIR inadequately addressed issues raised in our scoping letter. On October 1, 2007, the Committee submitted scoping comments for the DEIR (attached). Several of our comments, reproduced below, have not been addressed adequately:

Any relaxing of existing zoning standards will violate thresholds for environmental significance that the standards are meant to protect, unless compensatory environmental mitigation is required. This is especially true given the large size of the project. For example, easing density restrictions should be compensated with open space protection.

Increased building height and density should be compensated with open space protection. Decreasing views of hilltops and of natural areas are visual impacts that can be appropriately compensated for by open space protection.

Increase utilization of recreational resources must be analyzed in the EIR for direct, indirect, and cumulative impacts. The City should compare the analysis used for the Stanford GUP in Santa Clara County's EIR for comparison. Increased utilization is a significant impact unless mitigated.

The impact on housing will be significant unless mitigated and must be analyzed. The impact will also affect open space and traffic, because if new housing is not constructed by Stanford, it will be constructed mostly in Central Valley and elsewhere, with workers commuting in on area highways. The City must do its own calculations about the number of jobs generated by the amount of space created. Secondary (off-site) economic impacts must also be considered in determining the net demand for housing created by this project.

All newly-created housing demand should be fully mitigated with housing creation that matches the income level of housing demand generated.

Any analysis that concludes a "no net increase" mitigation standard for transportation is not feasible, must also determine why it is feasible for the much larger Stanford GUP expansion but not for this project.

Raising height limits, visual impacts, and the recreational impacts justify and require open space mitigation.

The Committee disagrees that simple compliance with undefined ARB recommendations for final design (DEIR at S-28) will suffice to convert an admittedly-significant impact before mitigation into one that is less-than-significant. The loss of open views and a "big sky" means that the ability to travel around the City and surrounding area and not find it dominated by structures is reduced. An appropriate mitigation for this impact is to secure nearby open space, and Stanford could appropriately do that by providing open space access or paying funds that could be used to secure open space access.

Similarly, increased recreational use in an area that the DEIR acknowledges has insufficient parkland (DEIR at 3.14-8) is a significant impact. The analysis of employee use fails to include overall increased population pressure, as the people who will be brought to work at SUMC will have to live somewhere with their families, despite the City's disinterest in requiring housing as part of the project. The failure to account for housing impacts means payment of the Community Facility Fee for non-residential development is insufficient to fully mitigate the project's impacts. Even if these people cannot live in Palo Alto, living elsewhere means they will place pressure on recreational uses elsewhere. That effect on recreational uses elsewhere is unanalyzed, as is the lost opportunity of Palo Alto residents to use these out-of-city facilities, thereby placing more pressure on City facilities. Finally, the analysis fails to consider the recreational impacts to areas immediately outside of Palo Alto such as the main campus area of Stanford and in San Mateo County, where the Community Facility Fee would not provide mitigation.

The cumulative recreational impact of this project together with other recreational population pressures is significant. Combined with visual impacts, the DEIR should require mitigation that creates recreational access to open space to mitigate the lost open sky and diminished recreational opportunities. One possibility which was included in the Stanford GUP DEIR was the construction of two trails from the main campus into the Foothills. The same could be done in this case, either from SUMC or from portions of the main campus easily accessible from SUMC into the Foothills. Alignments of the C1 Trail near the north side of Stanford Foothills and outside of the golf course would be ideal, or alternative versions of the S1 Trail that run along the Stanford Foothills and eventually connect to the trail under construction could work as well.

An alternative to dedication of a trail is payment of equivalent funds into a grant program that would mitigate Stanford's recreational impacts. Stanford has essentially agreed to do just that regarding its proposed sidewalk expansion along Alpine Road. If San Mateo County continues to reject the sidewalk expansion as it has, then Stanford will pay the money it would have spent on that massive project into a fund run by Santa Clara County Parks Department that could mitigate the recreational impacts of the Stanford GUP. Given that was Stanford's own agreement with the County, it should meet the same standard with the City.

The Committee for Green Foothills
July 27, 2010
Page 2 of 4
Transportation issues. Given the conclusion that transportation, air quality, and climate change impacts will be significant, the DEIR should have included either of the following feasible mitigations to reduce those impacts: 1. a No-Net-New Trips standard, based on the standard used in the Stanford County GUP EIR, requiring Stanford to either avoid the creation of net new trips or install the traffic mitigations required in this DEIR; or 2. the equivalent of No-Net-New Trips that would require SUMC to match every incentive and disincentive used by Stanford in the core campus, but without requiring actual measurement of traffic. This would not exempt Stanford from traffic mitigations required in the DEIR. This second alternative would adjust over time, "ratcheting" up to match changes in the program used on the core campus to avoid increased trips.

In developing a No-Net-New Trips standard, patient trips should also be taken into account, and Stanford should provide similar incentives to patients and guests to avoid increased trips. If this is seen as infeasible, however, the no net new trips standard could exempt patients and guests and still provide partial mitigation to the significant impacts from this project.

It should be noted that one traffic mitigation, improvements to Intersection #5 (El Camino/Ravenswood) (DEIR at 3.4-65), appears to be at least partially the same listed mitigation as that found in the Stanford GUP DEIR to mitigate for that separate and different Stanford project (Stanford GUP DEIR at 4.4-98). While the SUMC DEIR does not count the improvement of Intersection #3 towards the post-mitigation conclusion (DEIR at 3.4-65), it does count it here as potential mitigation for this project, and that could be double-counting of a mitigation that will not be effective because it could be "used up" for another Stanford project. It would be disturbing and inadequate if this mitigation were not considered feasible. The failure to discuss the potential double-counting in the DEIR is disturbing.

The DEIR states "The three feasible intersection improvements in Table 3.4-18 were combined with other mitigations to assess overall impact mitigation. In fact, only two feasible improvements are listed in Table 3.4-18. If the overall analysis counted on a third intersection mitigation that is now only considered "Potentially Feasible" or "Not Feasible," then the analysis exaggerates the effectiveness of the mitigation.

The impact of the SUMC expansion to traffic on Alpine Road between Juniper Serra and Highway 280 is likely to be especially severe. For this reason as well, a No-Net-New Trips standard should be applied.

Additional comments:

- The Tree Replacement Mitigation Measure BR-4.5 should emphasize the use of native trees and that provide maximum benefits to wildlife as replacement trees for the ones that would be removed if this project is approved.

- PH-1 impact analysis states the percentage of regional housing demand from the project is relatively small. DEIR at S-85. Given the tremendous total housing demand on this area, the cumulative is considerable and should be mitigated by the provision of on-site housing or paying into a fund for the construction of housing, especially housing that is affordable according to the type of demand generated by the new jobs at SUMC. Mitigation Measure PH-3.1 should be mandatory and should expressly apply to the SUMC project.

Please contact me with any questions.

Sincerely,

Brian A. Schmidt
Legislative Advocate, Santa Clara County
Re: Scoping comments for the Stanford Medical Center and Shopping Center Expansion EIR

Dear Steven;

The Committee for Green Foothills submits the following comments for scoping the EIR for the Stanford Medical Center and Shopping Center:

- The purpose of the approval for this project must be defined by the City, not by the applicant. If the purpose that the permissions the applicant seeks (such as improving medical care) can be done in a way that the applicant does not seek, that option remains within the purpose of the City. Legally, the applicant cannot define the purpose in a way that artificially narrows the scope of the project and its alternatives. Because the City is deciding whether to approve the agreement, it has to define the purpose.

- The EIR must consider a “no expansion/seismic only upgrade” alternative for the Medical Center.

- A “no increase in medical office space” alternative should be included. Conditions should be placed defining what type of activity or organization may use “medical office space.”

- Any relaxing of existing zoning standards will violate thresholds for environmental significance that the standards are meant to protect, unless compensatory environmental mitigation is required. This is especially true given the large size of the project. For example, easing density restrictions should be compensated with open space protection.

- Increased building height and density should be compensated with open space protection. Decreasing views of hillsides and of natural areas are visual impacts that can be appropriately compensated for by open space protection.

- Increase utilization of recreational resources must be analyzed in the EIR for direct, indirect, and cumulative impacts. The City should compare the analysis used for the Stanford GUP in Santa Clara County’s EIR for comparison. Increased utilization is a significant impact unless mitigated.

- The EIR process should analyze the phasing and mitigation monitoring used in the Stanford GUP EIR to avoid similar problems. For the Stanford GUP, six years after the impacts have occurred, the promised trails have not yet been constructed. Mitigations should not be begun before the impacts have occurred, they should be completed, or at least a schedule established with clear stop dates.

- The hospital opening should be in phases, with none the medical office space opening until all environmental mitigations have been complied with. This will make mitigation monitoring and enforcement more credible if it stops use of medical office space until environmental conditions are complied with as opposed to stopping use of the hospital.

- Any net increases in greenhouse gas emissions are cumulatively significant.

- “Green building” standards should be required.

The impact on housing will be significant unless mitigated and must be analyzed. The impact will also affect open space and traffic, because if new housing is not constructed by Stanford, it will be constructed mostly in Central Valley and elsewhere, with workers commuting in on area highways. The City must do its own calculations about the number of jobs generated by the amount of space created. Secondary (off-site) economic impacts must also be considered in determining the net demand for housing created by this project.

All newly-created housing demand should be fully mitigated with housing creation that matches the income level of housing demand generated.

Any analysis that concludes a “no net increase” mitigation standard for transportation is not feasible, must also determine why it is feasible for the much larger Stanford GUP expansion but not for this project.

Significant and unavoidable impacts must be compensated for in a comparable manner. For example, the visual impact of Medical Center skyscraper will be unavoidable, but rather than simply accept that as the cost the community must bear, it should be compensated for with open space protection where buildings do not predominate views.

Eliminate Stanford’s “plateau bargaining” through the use of binding promises in the process. For example, Stanford has made promises on where it would agree to place the S1 Trail on its property, and then after much work had been done by the County so it could accept the offer, Stanford reneged on the promises unless dramatic new concessions were added. This problem can be stopped by spelling out in advance when and which parts of a promise are binding.

Please contact us if you have any questions.

Sincerely,

Brian A. Schmidt
Legislative Advocate, Santa Clara County

20.1 The commentor questions the reasons why the publication of the Draft EIR was delayed. As stated by the commentor, the publication of the Draft EIR was delayed; however, this was due to several unanticipated factors rather than the SUMC Project sponsors’ noncompliance, as suggested by the commentor. Reasons for the delay include site plan modifications and application updates by the SUMC Project sponsors in order to fulfill Office of Statewide Health Planning and Development (OSHPD) requirements; withdrawal of the Stanford Shopping Center Project from the analysis of the Draft EIR; and changes in the Traffic Model. This comment does not concern the adequacy of the Draft EIR analysis or the SUMC Project’s compliance with CEQA. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review.

20.2 The commentor states additional delays were the result of the SUMC Project sponsors’ review of preliminary versions of the Draft EIR. The SUMC Project sponsors were initially allowed to review administrative drafts of the Draft EIR in order to provide technical expertise. The City permitted this review in recognition of the complexity of the SUMC Project and the need to verify the accuracy of information regarding hospital functions and the requirements of SB 1953. Although the SUMC Project sponsors had access to preliminary drafts, the public was also able to review the document prior to its publication. An early version of the Draft EIR was available in 2009 at the Palo Alto City Library upon request. After early 2009, neither the SUMC Project sponsors nor the public had access to the updated drafts of the document until publication of the Draft EIR in May 2010. Preliminary review by the SUMC Project sponsors and the public did not cause additional delays in the release of the Draft EIR.

20.3 The commentor states that the Draft EIR does not adequately address issues raised in their scoping letter submitted October 1, 2007. As discussed in Section 1 of the Draft EIR, Introduction, on page 1-3, the City provided a 41-day comment period for review of the Notice of Preparation (NOP). All written comments were reviewed and the Introduction to each environmental topic within Section 3 of the Draft EIR provides a summary of the relevant NOP scoping comments. All comments were considered in the analysis of each topic.

The commentor also observes that their NOP comment regarding existing zoning standards was not addressed in the Draft EIR. As noted on page 3.2-1 of the Land Use Section of the Draft EIR, “applicable land use issues that were identified during the scoping period pertain to the modification of existing zoning and land use designations and to mitigation of the environmental impacts that might result from such actions. These issues are considered in this section.”
The analysis in the Land Use Section notes that the SUMC Project would conflict with the existing development restrictions, such as floor-area-ratio (FAR) and height limits. However, the proposed zoning changes would resolve the potential zoning inconsistencies associated with the SUMC Project. As noted by the commentor, these changes to existing zoning could have impacts, particularly to visual quality. As such, Mitigation Measure VQ-2.1, presented in Section 3.2, Visual Quality, would mandate compliance with the City’s Architectural Review process. As stated on page 3.3-39, the Architectural Review Board (ARB) shall assess proposed building heights, massing, and siting of buildings and structures. Any recommendations made by the ARB with respect to the design of the SUMC Project, as adopted by the Council or Planning Director, would be implemented by the SUMC Project sponsors.

20.4 The commentor requests that building height and density increases, along with decreasing views of hillsides, should be compensated with open space protection. As stated above, the significant impact related to building height and density would be mitigated to a less-than-significant level by Mitigation Measure VQ-2.1, as discussed on page 3.3-39 of the Draft EIR. The City’s Architectural Review process would address, among other factors, whether the SUMC Project has a coherent composition and whether its bulk and mass are harmonious with surrounding development. The City Council will then determine if the design promotes consistent transitions in scale and character and that the amount and arrangement of open space are appropriate to the design and function of the structures. Mitigation Measure VQ-2.1 would also address impacts on hillside views from local streets and other vantage points, as discussed on pages 3.3-40 through 3.3-42. Mitigation Measure VQ-2.1 would reduce visual quality impacts to less than significant. Additionally, open space protection in areas other than the SUMC Sites would not further mitigate the increased density impacts to the SUMC Sites. Protection or development of off-site open space would not alter the visual character of the SUMC Sites and would, therefore, have no mitigating effect on the height of the buildings on the SUMC Sites.

In addition, as stated on page 3.14-9 of the Public Services Section, the SUMC Project proposes to expand the existing open space at the SUMC Sites. The open space would include walkways, open plazas, and landscaped areas for employees, patients, and visitors. The SUMC Project would also incorporate new sections of open space and small grass fields, increasing pervious surfaces by 23 percent over existing conditions. Several of these proposed open spaces would be visible from public areas, such as the landscaped gateway at the corner of Welch Road/Quarry Road, the LPCH/Shopping Center connection along Welch Road, the Hoover Pavilion entry lawn, and the refurbished Pasteur Mall. In addition, the SUMC Project sponsors would provide access to Stanford University’s fields for SUMC employees. This access would offset the potential deterioration new SUMC employees could cause on City parks. Therefore, even though the SUMC Project would increase height and bulk at the SUMC Sites, additional open space would be included and access to other open space areas would be available.
20.5 The commentor requests an analysis of increased utilization of recreational resources. Impacts on park and recreational facilities are discussed in Section 3.14, Public Services. As stated on pages 3.14-17 through 3.14-18, per the City’s Municipal Code, Section 16.58, the SUMC Project would be required to pay a City “Community Facility Fee” to mitigate potential park impacts. In addition, as explained above under Response 20.4, the SUMC Project would supply ample open space amenities for its employees and patients. Because open space amenities are currently provided at the SUMC Sites and would be expanded as part of the proposed facilities, it is not expected that a large number of SUMC employees and patients would use nearby parks. Therefore, with the required City Community Facility Fee, impacts on parks would be less than significant. Refer to Impacts PS-4 and PS-5 in Section 3.14 of the Draft EIR for more details regarding SUMC Project impacts on parks and Impact PS-9 for the cumulative impacts on parks and recreational facilities.

The commentor also requests a comparison of the analysis used in the Stanford University 2000 Community Plan and General Use Permit (CP/GUP) regarding recreational areas. Comparing the impacts of the SUMC Project on park facilities to the impacts of the CP/GUP is unwarranted. As stated on page 4.2-23 of the CP/GUP Final EIR, “the CP/GUP will reduce the availability of recreational facilities while increasing the demand for such facilities.” As explained in the CP/GUP Final EIR, the CP/GUP proposes development of housing at several sites that are currently used for recreation. Therefore, construction of the housing under the CP/GUP would displace these recreational areas. In addition, because the CP/GUP includes housing, the residential population in the area would increase, thereby contributing to deterioration of nearby parks. Since the SUMC Project does not include the construction of housing and would not displace existing or proposed parks, the impacts of the SUMC Project are not similar to the CP/GUP and therefore, further comparison is not warranted.

20.6 The commentor requests an analysis of impacts on housing. Please see Master Response 7. The SUMC Project sponsors are not proposing to construct housing as part of the SUMC Project; as such, the SUMC Project would not directly result in environmental impacts due to housing construction. As indicated in Section 3.13 of the Draft EIR and in Master Response 7, the indirect housing demand due to new SUMC employment would be within housing growth projections in the region, and as such would be less than significant. The distribution of indirect housing demand in Table 3.13-8 of the Draft EIR is based on historical evidence, comprised of SUMC’s data on the residential distribution of their employees. As indicated on page 3.13-11 of the Draft EIR, the distribution of where SUMC Project employees would live is based on existing SUMC employee zip code data

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1 The Community Facility Fee is a mix of the Park fee ($4.234 per net new square foot) + Community Center fee ($0.239 per net new square foot) + Libraries fee ($0.228 per net new square foot). Hence, the Parks line item of the fee is just part of the Community Facility fee.

2 County of Santa Clara, Stanford University Draft Community Plan and General Use Permit Application, Final Environmental Impact Report, Certified by the Santa Clara County Board of Supervisors, December 2000.
provided by the SUMC Project sponsors (see Appendix L of the Draft EIR). Also, housing to accommodate additional demand throughout the region would be subject to separate environmental review and mitigation, as warranted. Lastly, to state that housing due to the SUMC Project would be constructed mostly in the Central Valley is speculative. As indicated in Table 3.13-8, a small 4.8 percent of new SUMC employees would demand 64 housing units outside the San Francisco Bay Area.

Economic impacts due to housing demand is not an environmental impact that requires discussion under CEQA. Please see Master Response 10 for a discussion of non-CEQA issues.

20.7 The commentor requests mitigation for housing demand. Please see Master Response 7 for a discussion of housing demand due to the SUMC Project.

20.8 The commentor refers to Stanford’s “No Net Increase” mitigation standard for transportation, and asks why it was considered feasible for the CP/GUP but not for the SUMC Project. Please see Master Response 2 for a discussion of imposing a No Net New Trips requirement. Also, per CEQA Guidelines Section 15126.4(4)(B), mitigation measures must be roughly proportional to the impacts of the project. The standards of significance applied in the transportation analysis are listed on Draft EIR pages 3.4-30 through 3.4-32. Based on these criteria, there could be some increase in traffic that would not result in a significant impact. As such, requiring No Net New Trips as a mitigation measure would be beyond the requirements of CEQA. See Staff-Initiated Change 2, which provides the revised analysis of level of service (LOS) impacts, and the updated mitigation measures for significant LOS impacts. The mitigation measures identified in Staff-Initiated Change 2 are appropriate.

20.9 The commentor expresses concern about the height of the SUMC Project towers and the associated visual impacts. Please refer to Response 20.4, above.

The commentor also requests open space mitigation for visual impacts. Although not proposed as a mitigation measure because it is required for all projects in the City of Palo Alto per the Municipal Code, the Community Facility Fee would be required. As explained above under Response 20.5, the SUMC Project sponsors would be required to pay these fees to reduce park impacts. In particular, the Community Facility Fee would go towards new neighborhood and district parklands acquisition, community center development, and the local library system. Per the fee rates, the SUMC Project sponsors

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3 Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.
would contribute approximately $6.2 million to this fee, $5.6 million of which would be
dedicated to the parks portion. 4

20.10 
The commenter states that the analysis of the park and recreational impacts from the
SUMC Project does not take into account population growth. Increases in residential
population within the City due to the SUMC Project are considered to be a tertiary impact.
That is, the SUMC Project would directly increase employment, which is expected to
generate housing demand, and thus induce more housing, a secondary impact. These
additional housing units would generate a greater demand for parks, a tertiary impact.
Tertiary impacts are generally acknowledged in the Draft EIR; however, these impacts
would not occur as a direct impact from the SUMC Project. The new residential
development that may indirectly result from the increase in employment under the SUMC
Project would be subject to separate CEQA review and would be required to pay separate
Community Facility Fees.

The commenter also states that the Draft EIR does not include an analysis of the parks and
recreational impacts in adjacent cities and/or San Mateo County. As explained above,
while the Draft EIR acknowledges the potential effects of growth induced by the SUMC
Projects, the impacts analysis in the Draft EIR focuses on the direct impacts of the SUMC
Project. It is anticipated that increased employment at the SUMC Sites would result in
increased use of existing nearby neighborhood parks, particularly during the lunch hour or
before or after shifts. However, due to various shifts, employees would have lunch breaks
at different times and only a fraction of the daytime employees would potentially use park
grounds during lunch or after work. This type of use – walking or eating lunch – would
not result in substantial deterioration of park facilities. In addition, due the limited time
during their breaks, it is unlikely that the employees would travel to adjacent cities to use
the park facilities. Therefore, the increase in park use by new SUMC employees would
not be such that it would result in substantial deterioration of park facilities in adjacent
jurisdictions.

Although the SUMC Project sponsors would allow access to open spaces and fields at the
Stanford University campus, the increase of 2,242 employees at the SUMC Sites is not
expected to significantly impact these areas. In addition, visitors and patients are not
expected to utilize nearby parks since their visits to the SUMC Sites would be focused on
the healthcare serves offered by the SUMC Project. Since there is existing ample open
space at the Stanford University campus and additional open space is proposed under the
SUMC Project, an increase of employees would not result in deterioration of these
resources, whether in the City of Palo Alto or neighboring jurisdictions.

4 The Community Facility Fee is a mix of the Park fee ($4.234 per net new square foot * 1,311,411 square
feet = 5,552,514 = ≈$5.6 million) + Community Center fee ($0.239 per net new square foot * 1,311,411
square feet = $313,427) + Libraries fee ($0.228 per net new square foot * 1,311,411 square feet =
$299,001) = $6,164,943 = ≈$6.2 million.
20.11 The commentor suggests mitigation from the CP/GUP EIR to mitigate cumulative park impacts. As discussed on pages 3.14-24 through 3.14-25, under Impact PS-9 of the Public Services section, cumulative growth in the City would necessitate acquisition or development of new parklands. However, the contribution of the SUMC Project to this cumulative impact would be less than cumulatively considerable. Since the SUMC Project and all other projects proposed within the City would pay a Community Facility Fee, impacts are not considered to be significant.

As explained under Response 20.5, a comparison to the CP/GUP EIR is not warranted. Unlike the CP/GUP, the SUMC Project would not include the development of housing units. The increase in population due to the housing units proposed under the CP/GUP would have a significant direct impact on parks and the development of new housing would convert existing parks and open spaces, thereby reducing park acreage in the area. Because of these significant impacts resulting from the CP/GUP, additional mitigation was proposed to lessen the impacts, including two trails. However, since the SUMC Project would have less-than-significant impacts on parks with the payment of the Community Facility Fee, the SUMC Project would not be subject to additional mitigation measures.

20.12 The commentor states that an alternative to dedicating trails as mitigation, payment of equivalent funds would mitigate impacts. Please refer to Responses 20.5 and 20.11. As explained above, the payment of the Community Facility Fee would mitigate park impacts. Therefore, no other mitigations or fees are required.

20.13 The commentor states that the Draft EIR should have included a No Net New Trips standard. Please see Response 20.8 and Staff-Initiated Change 2 for a discussion on Changes to Intersection Conclusions, and Master Response 2 for the feasibility of imposing a No Net New Trips requirement.

20.14 The commentor states that the intersection of El Camino Real and Ravenswood Avenue (intersection #3) is being double counted as mitigation in the CP/GUP and the current Draft EIR for the SUMC Project. The commentor notes that the mitigation is required for another project and there are three other intersections that are common to both environmental documents. Many times the traffic analyses for projects consider identical intersections and arrive at the same mitigation for those projects. When a project is required to fund its fair share of an improvement to mitigate the impact, it only covers a percentage of the total cost. As other projects contribute, and when full funding is available, the improvement can be made. Therefore, the SUMC Project EIR is not double counting or using mitigation from a prior project. Also, Stanford did not make the intersection improvements noted in the CP/GUP Draft EIR. Instead, the County imposed a No Net New Trips policy that stated that the physical improvements to intersections could be deferred as long as traffic monitoring determined that Stanford was not increasing their traffic levels. In any event, as explained in Staff-Initiated Change 2, physical roadway
improvements are not needed at this intersection to reduce SUMC Project impacts to a less-

than-significant level.

20.15 The commentor states that there appears to be an error on page 3.4-65 of the Draft EIR. The Draft EIR refers to “three feasible intersection improvements.” This is because several of the other intersections listed on Table 3.4-18 would not experience a significant impact due to the SUMC Project after implementation of traffic adaptive signal technology and an enhanced TDM program. Please see Staff-Initiated Change 2 for a revised discussion of roadway improvements and intersection LOS impacts.

20.16 The commentor states that the impact of the SUMC expansion to traffic on Alpine Road between Junipero Serra Boulevard and I-280 is likely to be especially severe, so a No Net New Trips standard should be applied. Please see Response 20.8, above, and Staff-Initiated Change 2 for a more detailed discussion on changes to intersections, and Master Response 2 for the feasibility of imposing a No Net New Trips requirement.

20.17 The commentor requests that Mitigation Measure BR-4.5 on page 3.9-28 of the Draft EIR include the replacement of removed trees with native trees. Tree replacement pursuant to this measure will be consistent with the City of Palo Alto Public Works Department Street Tree Management Plan. As such, street tree replacement would include native species to the maximum extent possible and appropriate species include California black oak, red maple, toyon, and flax leaf paperbark.

20.18 The commentor states that regional housing demand would be great. As shown in Table 3.13-8 of the Draft EIR, the additional housing demand from the SUMC Project would be within projected housing growth for each community within the region. As such, impacts would be less than significant. On page 3.13-20, the Draft EIR states “Table 3.13-8 demonstrates that the indirect housing demand from the SUMC Project would represent a small percentage of the cumulative housing development at 2025 for all jurisdictions.” Because the SUMC Project would not result in a cumulatively considerable effect, mitigation for housing demand would not be required. Per CEQA Guidelines Section 15126.4(3), mitigation measures are not required for effects that are not found to be significant. Also, please refer to Master Response 10 for a discussion of non-CEQA issues. Lastly, see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

20.19 The commentor resubmitted the NOP comments. Please see Responses 20.1 through 20.18, above.
Mr. Williams, Council Members:

I have begun reading through the EIR for the Stanford Medical Center Renewal and Replacement Project and I find an error of fact that impacts some conclusions.

In the Transportation Appendix C, Middlefield Road is listed as an arterial. Middlefield Road within Palo Alto is classified as an arterial. Under the City of Menlo Park guidelines, it is considered as a minor arterial. Page 1-5

In fact, Middlefield in Palo Alto is classified as a residential arterial. This impacts conclusions about whether an increase in traffic is significant or not.

For example:

3.7.1 Palo Alto Residential Street Analysis
A street is considered impacted if the TIRE Index increases by 0.1. An increase in the TIRE Index of 0.1 or more indicates that residents would notice an increase in traffic on the street.

The 'With Project' scenario is compared to the 'No Build' scenario to determine any project impact. No residential roadway segments would be significantly impacted by the project in 2025 as seen in Table 3-8.

Further, the report finds that the Middlefield/Willow Road intersection will be impacted but that the Middlefield/Lytton and Middlefield/University intersections will not. Middlefield Road / Willow Road (#18) LOS remains at E but the average critical movements exceeded 0.8 seconds for this Menlo Park intersection. This intersection is significantly affected by the project.

This is highly unlikely if the increased traffic is heading to the Stanford Hospital as these intersections provide the most direct route from Willow Road to Stanford.

And here is another example:

For Marsh Road, Sand Hill Road, Willow Road and Ravenswood Avenue that are classified as minor arterials with No Build volumes greater than 18,000, adding more than 100 trips in ADT would be considered an impact. The proposed SUMC expansion is expected to add more than 300 trips on these roadway segments. As such, the project would impact these roadway segments in Menlo Park according to the City’s significance criteria.

Again if 300 additional cars on Willow Road are headed to Stanford, the most likely route is on Middlefield to Lytton and University.

I look forward to hearing from you when the error is corrected and with your view of these questions about the impact on Middlefield Road.

Thank you,

John Guislin
Middlefield North Neighborhood Association

21.1 The commentor states that Middlefield Road is identified as an arterial in the Draft EIR when in fact it is a residential arterial and therefore should have been analyzed by the TIRE index to determine if the SUMC Project has an impact to this residential street. The TIRE index analysis was conducted for Middlefield Road in Palo Alto. The existing TIRE Index is 4.2, the Future No Project TIRE Index is 4.3, and the Future With Project TIRE Index would also be 4.3. An increase of 5,200 daily vehicles is needed to trigger an increase in the TIRE Index. The SUMC Project is not expected to contribute more than 1,000 daily trips without implementation of enhanced transportation demand management (TDM) measures (Mitigation Measure TR-2.3). As such, SUMC Project-generated traffic would not cause a change in the TIRE Index and, therefore, would not have a significant impact according to the City of Palo Alto standards of significance. The SUMC Project would not result in a significant impact on Middlefield Road at Lytton Avenue.

21.2 The commentor states that the Transportation Impact Analysis for the Draft EIR found that Middlefield Road/Willow Road (intersection #18) was identified as an intersection impacted by the SUMC Project, but Middlefield Road/Lytton Avenue (intersection #19) and Middlefield Road/University Avenue (intersection #20) were not. The commentor notes that if one intersection is impacted all adjacent intersections would experience similar amounts of SUMC Project traffic and should also be impacted. The Transportation Impact Analysis (see Appendix C of the Draft EIR) found that both Middlefield Road/Willow Road and Middlefield Road/Lytton Avenue would be significantly impacted by the SUMC Project but, University Avenue/Middlefield Road would not. Similar amounts of SUMC Project traffic travel through the Middlefield Road/Willow Road and Middlefield Road/Lytton Avenue intersections, but lesser amounts of SUMC Project traffic travels through the University Avenue/Middlefield Road intersection. A large proportion of project traffic is expected to turn off Middlefield Road at Lytton Avenue and uses Lytton Avenue to traverse downtown Palo Alto, because of the slow travel speeds along University Avenue. Middlefield Road/Lytton Avenue and Middlefield Road/Willow Road would not require physical improvements to mitigate SUMC Project traffic because the higher priority mitigation involving traffic-adaptive signal technology would mitigate the effect of SUMC Project traffic. See Staff-Initiated Change 2.

21.3 The commentor states that Marsh Road, Sand Hill Road, Willow Road, and Ravenswood Avenue are all classified as minor arterials with no build traffic volumes over 18,000. The commentor further states that project traffic on these streets of 100 or more vehicles per day would constitute a significant impact according to the City of Menlo Park’s criteria; if 300 additional cars on Willow Road are headed to Stanford University the most likely route is on Middlefield Road, to Lytton Avenue, and University Avenue. Draft EIR page 3.4-71 Table 3.4-21 lists the roadway Average Daily Trip (ADT) analysis for streets in Menlo
Park. The analysis examined Middlefield Road in Menlo Park and found that SUMC Project-generated traffic would not have a significant impact according to Menlo Park’s criteria. The City of Palo Alto uses a different analysis methodology (TIRE Index) to evaluate SUMC Project impacts on roadway segments. For Middlefield Road, the existing TIRE Index is 4.2, the 2025 Future Without Project TIRE Index is 4.3, and the 2025 with project TIRE Index would also be 4.3. An increase of 5,200 daily vehicles is needed to trigger an increase in the TIRE Index. The SUMC Project is not expected to contribute more than 1,000 daily trips without implementation of enhanced TDM measures. As such, the SUMC Project traffic would not cause a change in the TIRE Index and, therefore, does not constitute a significant impact according to the City of Palo Alto standards of significance.
July 27, 2010

Steven Turner  
Department of Planning and Community Environment  
City of Palo Alto  
250 Hamilton Avenue  
Palo Alto, CA 94303

Re: Stanford University Medical Center Facilities Renewal and Replacement Project  
Comments on DEIR

Dear Mr. Turner:

Stanford Hospital and Clinics, Lucile Packard Children’s Hospital, and the Stanford University School of Medicine appreciate the time and effort expended by staff and its consultants in preparing the Draft Environmental Impact Report for the Stanford University Medical Center Facilities Renewal and Replacement Project. The Project sponsors recognize the complexity of evaluating a project with multiple components, to be built over an extended period in a location that is proximate to multiple types of land uses, including transit, residential, commercial, and campus uses. In our view, the Draft EIR satisfies the goals of the California Environmental Quality Act by disclosing the potential environmental consequences of approving the proposed SUMC Project and the project alternatives.

The Project sponsors have worked cooperatively with City staff to design a project that enables the delivery of high quality health care and the performance of life-saving medical research, while fitting within the surrounding community as a good neighbor. The Draft EIR demonstrates that the project can achieve these mutual benefits:

- With appropriate attention to architectural design, the project’s height and mass will not result in significant adverse impacts to visual quality or scenic views. With review and input by the City’s Architectural Review Board, the project architects are designing visually appealing structures, courtyards, streets and landscaping that will enhance the Quarry Road corridor and SUMC Sites.
- The Project will restore the Hoover Pavilion building, an important historic resource to the citizens of Palo Alto. New, architecturally compatible buildings on the Hoover Pavilion site will be designed with sensitivity to views and context of the historic structure.
- The Project will provide seismically safe buildings, designed to prevent disruptions in hospital service during or after a major earthquake.
- The SUMC Project’s energy conservation, water conservation and green building features will reflect the extraordinary commitment by the Hospitals, Stanford University, and the City of Palo Alto to promoting sustainable practices in building construction and operations.
- By providing the Caltrain Go Pass to existing and future Hospital workers, along with increased Marguerite shuttle service, the SUMC Project’s peak period trips will be reduced from approximately 750 trips in the morning and evening to about 250 trips during each period. After mitigation (including the Go Pass, signalization adjustments and improvements to four intersections), the SUMC Project will result in no significant impacts to intersection congestion in Palo Alto and nearby cities.
- The linkage improvements presented in the Village Concept Alternative will provide amenities to encourage walking, bicycling and transit use by SUMC employees, and the surrounding community. As part of a Development Agreement, the Project sponsors have offered to fund safe and attractive pathways through the Palo Alto Transit Center, along Quarry Road, and through the Stanford Barn area between the medical center and the Stanford Shopping Center.
- The Project design presented in the Tree Preservation Alternative will save all of the oaks that the City has identified as important biological and aesthetic tree resources within the SUMC Sites. Most biological and aesthetic tree resources will be preserved in place; three will be relocated to visually prominent sites. The Project sponsors support City approval of this alternative.

Overall, we believe the Draft EIR is well-drafted and informative. We present the following technical comments in order to provide clarifications and to ensure that the EIR identifies technically feasible mitigation to avoid or reduce adverse effects. The comments follow the order of the chapters of the Draft EIR.

Project Description

The project description provides accurate information regarding the proposed SUMC Project and the anticipated employee and patient population. We noticed a few minor discrepancies in the summary chapter, all of which are correctly presented in other text.

22.1 On page S-7, the size of the annexation acre should be described as 0.75 acres, as reflected elsewhere.

22.2 On page S-12, the text should state that the Development Agreement terms have been proposed by the Project sponsors, rather than by the City. The Supplemental Development Agreement terms are those proposed by City staff.
Transportation

On page 3.4-27, the Draft EIR states that a State law passed in 1995 prohibits public agencies from requiring mandatory transportation demand management. The Draft EIR then states that the City has concluded that, notwithstanding this State law, the City nonetheless can effectively require the applicant to include TDM measures in the SUMC Project.

While the SUMC Project sponsors remain committed to providing the Caltrain Go Pass to existing and future Hospital employees, as well as associated Marguerite shuttle service, through a Development Agreement, we disagree with the City's legal position that these or other TDM measures could be required absent the Project sponsors' agreement.

Section 40717.9 of the Health and Safety Code provides: “a district, congestion management agency, or any other public agency shall not require an employer to implement an employee trip reduction program unless the program is expressly required by federal law and the elimination of the program will result in the imposition of federal sanctions, including, but not limited to, the loss of federal funds for transportation purposes.” Federal law does not require an employee trip reduction program; therefore, State law prohibits the City from requiring the SUMC Project sponsors to implement TDM measures.

We have attached a memorandum from our legal counsel explaining our position. [Attachment 1] We also have reviewed the memorandum prepared by the City's outside counsel concluding that, because Palo Alto is a charter city, it need not comply with State law. The memorandum argues that reduction of traffic congestion is a municipal matter; therefore, State law addressing this topic does not apply to a charter city. While a charter city can avoid statewide regulation when the subject is purely municipal in nature, the Legislature adopted the relevant section of the Health and Safety Code to address cost concerns by businesses throughout the state, primarily in response to conditions imposed to address regional air quality. These statutory purposes are not limited to, the loss of federal funds for transportation purposes.” Federal law does not require an employee trip reduction program; therefore, State law prohibits the City from requiring the SUMC Project sponsors to implement TDM measures.

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stated in Condition of Approval 12: “Any modification of this permit will acknowledge that Stanford has voluntarily agreed to this supplemental employee trip reduction program and that state law currently prevents the City from imposing employee trip reduction programs without Stanford’s consent.”

Similarly, the City’s EIR for the Cancer Center stated on page 3.5-9: “Transportation demand management refers to actions that reduce work-related, drive-alone vehicle trips. Although a state law was passed in 1995 that prohibited agencies and cities from TDM Stanford University requiring mandatory TDM, the City of Palo Alto and Stanford still voluntarily provide TDM programs for their employees.”

A similar acknowledgment should be provided here. The Hospitals and School of Medicine are committed to maintaining robust TDM programs. As part of a Development Agreement, the Hospitals have offered to enhance their TDM program by providing Go Passes to existing and future employees at a cost of millions of dollars. This reflects the Hospitals’ commitment to sustainability, and recognizes the importance of reducing congestion on Palo Alto roadways.

In addition, the Project sponsors have the following comments on the Transportation chapter’s impact analysis and mitigation:

- On page 3.4-44, the Draft EIR identifies Mitigation Measure TR-1.6, which is intended to protect public roadways during construction. The measure requires the Project sponsors to survey road conditions before and after project construction, and to repair any structural damage. Given the duration of project construction, we are concerned that the measure does not provide adequate safeguards to ensure that damage revealed during post-construction surveys was actually due to SUMC Project construction and not ordinary wear and tear or other construction projects during this period. During the 12-year construction period, normal wear and tear on area roadways would be expected to lead to deterioration, and vehicles unrelated to project construction vehicles could cause additional damage.

- On pages 3.4-44 and 4.4-45, the Draft EIR identifies Mitigation Measure TR-1.9, which applies to diminished roadway capacity during special events. The only project component that might temporarily decrease roadway capacity during construction would be work in and along Welch Road. Welch Road is not used for access to athletic events or other special events that would attract a substantial number of visitors. This measure appears to be unwarranted.

- On pages 3.4-66 and 3.4-67, the Draft EIR identifies Mitigation Measure TR-2.1, which would require the SUMC Project sponsors to contribute to traffic adaptive signal timing in Palo Alto and Menlo Park. The Draft EIR (pp. 3.4-66 and 3.4-67) recognizes that the Citywide Traffic Impact Fee program provides funding for adaptive signal timing in Palo Alto. However, the Draft EIR (pp. 3.4-67 and 3.4-67) states that “an additional fee could be imposed by the City on the SUMC Project to mitigate the remaining share of the SUMC Project impacts.” The Final EIR should specify the additional fee, if any, that would be required and demonstrate that the fee is proportionate to SUMC Project impacts.

In addition, the Draft EIR (p. 3.4-67) identifies locations for installation of traffic adaptive signals in Menlo Park. We understand that traffic adaptive signals already have been installed at Sand Hill/Santa Cruz, Junipero Serra/Alpine, Sand Hill Road/Oak, and on El Camino Real from Encinal to Quarry Road (10 signals). The Final EIR should specify the SUMC Project’s fair-share contribution to traffic adaptive signals in Menlo Park.

- On page 3.4-67, the Draft EIR identifies Mitigation Measure TR-2.2, which would require the SUMC Project sponsors to contribute their fair share of the cost of construction of the Everett Avenue undercrossing in Palo Alto and the Middle Avenue undercrossing in Menlo Park. The Final EIR should specify the additional fee beyond the Citywide Traffic Impact Fee, if any, that would be required and demonstrate that the fee is proportionate to SUMC Project impacts.

- On pages 3.4-67 to 3.4-69, the Draft EIR identifies Mitigation Measure TR-2.3, which would require enhanced TDM programs. As explained above, any such requirements can be imposed only to the extent that the Hospitals voluntarily agree to them. The Project sponsors anticipate that the specifics of this measure will be the subject of Development Agreement negotiations.

- On page 3.4-69, the Draft EIR identifies Mitigation Measure TR-2.4, which would require the SUMC Project sponsors to implement intersection improvements at El Camino Real/ Page Mill Road-Oregon Expressway and at Arborcreek Road/ Galvez Street. However, on page 3.4-56, the Draft EIR states that, with implementation of traffic adaptive signal technology, the SUMC Project would not result in a significant impact to the El Camino Real/ Page Mill Road-Oregon Expressway intersection. A contribution to further improvements to this intersection does not appear to be warranted.

- On pages 3.4-69 and 3.4-70, the Draft EIR identifies Mitigation Measure TR-2.5, which would require the SUMC Project sponsors to implement additional intersection improvements if such improvements are determined to be feasible. However, on page 3.4-61, the Draft EIR states that after implementation of traffic signal adaptive technology, funding of a proportionate share of two undercrossings, and an enhanced TDM program, the SUMC Project would result in significant impacts to only four intersections. One of the intersections, Arborcreek Road/ Galvez Street is addressed under Mitigation Measure TR-2.4. Mitigation Measure TR-2.5 should be limited to the remaining three intersections: Middlefield Road/ Willow Road; Bayfront Expressway/ Willow Road; and University Avenue/ Bayfront Expressway. We understand that Menlo Park City staff has informed Palo Alto that improvements at each of these intersections are feasible. The Final EIR should specify the SUMC Project’s fair-share contribution to these intersection improvements in Menlo Park.

- Appendix K of the Traffic Impact Study identifies potential remote parking lots as an alternative to provision of enhanced TDM programs. Remote parking lots are a type of employee trip reduction program, which cannot be required absent the Project sponsors’ voluntary agreement. The SUMC Project sponsors have not agreed to provide remote parking lots. Such lots encourage travel by single-occupant vehicles for most of the commute trip, unlike provision of the Go Pass which encourages use of public transit. In addition, remote parking lots
create many issues related to recruitment and retention of employees in a competitive environment, capital and operational costs, spillover effects in adjacent neighborhoods, and personal and vehicle safety. Please see the attached information from Fehr & Peers discussing the critical issues associated with providing remote parking for Hospital workers, as well as a discussion of the feasibility of each of the potential remote parking lots. [Attachment 2]

On page 3.4-72, the Draft EIR evaluates impacts to local circulation. The Draft EIR identifies a potential impact due to the length of the proposed new road at Durand Way, and identifies Mitigation Measure TR-4.2, which would ensure that queues from the Durand Way/ Sand Hill Road intersection do not spill back onto the Durand Way/ Welch Road intersection. The mitigation measure for this identified impact appears to be feasible.

However, the Draft EIR (p. 3.4-72) also identifies a potential impact to safety on Welch Road, which does not appear to be warranted. According to the Draft EIR, the projected traffic volumes are “approaching the capacity” of the roadway. The Draft EIR states that the traffic volumes, combined with turning movements, pedestrian and bicycle travel could create a safety hazard on Welch Road. Fehr & Peers, the Project sponsors’ traffic consultants, presented simulations of localized traffic conditions. The simulations show that Welch Road would function within capacity. The Project will consolidate crosswalks on Welch Road, and add a traffic signal, which will improve pedestrian and bicycle safety compared with existing conditions.

The Draft EIR (p. 3.4-73) identifies Mitigation Measure TR-4.1, which would require the Project sponsors to fund another localized traffic study after project construction. The measure states: “If the independent traffic study demonstrates that the connection between Roth Way and Pasteur Drive as a public street would improve circulation, then the connection shall be designated as a public street for all vehicular, bicycle, pedestrian and transit traffic.” The Project sponsors have submitted a detailed traffic simulation study; a further post-construction study is not warranted. The Roth Way and Pasteur Drive connection is not intended to function as a public street. The connection, as designed, would provide pedestrian and bicycle linkages between the campus, Hospitals, and School of Medicine. In addition, the connection could be used for Marguerite shuttle service. Creating a roadway for general vehicle traffic would interfere with pedestrian and bicycle linkages, and place a barrier between the Hospitals and School of Medicine. This would be detrimental to the linkages and programmatic relationships within the SUMC. Further, requiring a change to the roadway after Project construction would entail additional construction work and expense to re-build the road. Moreover, the mitigation measure’s requirement to construct the road if “improvement would occur” is not tied to a determination in the future traffic study that a significant adverse effect has in fact occurred, nor is there any standard for measuring the effect or the degree to which conditions must be improved.

On page 3.4-73, the Draft EIR recognizes that the project vicinity is conducive to bicycle and pedestrian travel, and that an extensive bicycle and pedestrian network currently exists around the SUMC sites. The Draft EIR does not identify any Project component that would impede these existing pedestrian and bicycle facilities. Nor does the Draft EIR identify any Project component that would impede future, planned pedestrian and bicycle facilities. To the contrary, the Draft EIR recognizes that the Project includes future bicycle and pedestrian facilities throughout the Project sites. (See Draft EIR at Figure 3.4-10)

On page 3.4-76, the Draft EIR then states that an increase in bicycle and pedestrian travel, together with increased traffic volumes, “could result in increased traffic-related hazards to pedestrians and cyclists.” Such an impact does not appear to relate to the City’s significance standard, which evaluates whether a project will impede planned bicycle and pedestrian facilities. Generally, increasing use of bicycle and pedestrian modes of transportation is viewed as positive, and the Draft EIR shows that the Project sites and surrounding areas provide robust pedestrian and bicycle facilities. The impact on pedestrian and bicycle facilities does not appear to be warranted.

On pages 3.4-76 and 3.4-77, the Draft EIR identifies Mitigation Measure TR-6.1, which would require the SUMC Project sponsors to fund seven categories of pedestrian and bicycle improvements. The Project sponsors provide the following comments on the feasibility of the improvements:

- Measure TR 6.1 suggests that the Project sponsors provide an enhanced, 12-foot-wide pedestrian crossing at Quarry Road/ El Camino Real. Any improvements to El Camino Real would be subject to Caltrans approval. Further, on page 5-200, the Draft EIR analyzes changes to the pedestrian crossing at Quarry Road/ El Camino Real. According to the Draft EIR, if pedestrian crossing times were increased, a new significant impact would occur in the AM Peak Hour.

- Measure TR-6.1 suggests that the Project sponsors provide a connection between the Stanford Shopping Center and the SUMC. The Project sponsors have offered to fund such a connection, through the Stanford Barn area, as part of a Development Agreement.

- Measure TR-6.1 suggests that the Project sponsors provide a connection from the planned Everett Avenue bicycle and pedestrian undercrossing to the El Camino Real/ Quarry Road intersection. The Project sponsors have offered to fund such a connection, including landscaping and other amenities, as part of a Development Agreement.

- Measure TR-6.1 suggests that the Project sponsors provide a bicycle and pedestrian trail through the Arboretum as part of future campus planning in the SUMC area. The Arboretum is not located in Palo Alto, and the planned pathway is not subject to the City’s jurisdiction. Provision of the pathway is not necessitated by the SUMC Project and, if implemented, would be the subject of a separate County approval process. The Hospitals do not own or control the land in the Arboretum.

- Measure TR-6.1 suggests that the Project sponsors incorporate into the Quarry Road corridor continuous sidewalks according to the SUMC Project’s Design Guidelines. Continuous sidewalks already exist along Quarry Road. The Project sponsors have offered to fund enhancements to bus stops along Quarry Road as part of a Development Agreement.
22.26
Con't

Agreement.

* Measure TR-6.1 suggests that the Project sponsors enhance all signalized intersections in the Project vicinity to include 12-foot-wide pedestrian crosswalks and other improvements. Marked pedestrian crosswalks exist throughout the project vicinity. The Draft EIR does not provide sufficient information to assess whether these improvements would be feasible, or desirable.

* Measure TR-6.1 suggests that the Project sponsors install Class I and Class III bicycle parking spaces. The SUMC Project will include installation of bike parking spaces.

On pages 3.4-77 and 3.4-78, the Draft EIR evaluates effects on transit. The Draft EIR (p. 3.4-77) recognizes that the Project vicinity is served by Marguerite shuttles, Sam Trans, VTA, the U-Line and Palo Alto shuttles. The Draft EIR (p. 3.4-78) states that SUMC Project would increase transit ridership, and concludes this would result in a significant impact on transit. Increasing transit travel mode is considered to be a positive step in reducing traffic congestion, air pollution and greenhouse gases. The Draft EIR’s conclusion that such an increase results in a significant adverse impact does not appear to be warranted.

The Draft EIR (p. 3.4-78) states that provision of Caltrain Go Passes to Hospital employees would require increased Marguerite shuttle service. The SUMC Project sponsors have offered to provide increased Marguerite shuttle service as part of a Development Agreement.

The Draft EIR (p. 3.4-78) states that provision of parking spaces at an expanded Ardenwood Park-and-Ride lot would increase ridership on the U-Line such that ridership could be higher than a 1.0 load factor. Stanford provides funding toward operation of the U-Line and works with AC Transit to increase service as needed. In 2007, the University created two afternoon Ardenwood express buses that run between the campus and the Ardenwood Park-and-Ride lot in order to supplement the AC Transit U-Line operations.

The Draft EIR (p. 3.4-79) states that the increase in transit ridership resulting from issuance of Caltrain Go Passes could be a significant impact without facility improvements that accommodate several bus routes simultaneously and that also provide queuing areas for the passengers. Please see the attached response to the City’s data request regarding transit centers, which we provided on January 8, 2010. [Attachment 3] As explained in the attachment, traditional transit centers are commonly provided where there are multiple service providers and a need for vehicles to layover to accommodate transfers or schedule. These conditions do not occur at the SUMC. Stanford directly controls the vehicles using the bus stops in the SUMC and there are few transfers that occur at these bus stops. That, combined with the high frequency of service, minimizes the number of passengers queued at any stop. In addition, Stanford monitors shuttle operations and adjusts or adds service when demand exceeds capacity.

On page 3.4-80, the Draft EIR identifies Mitigation Measure TR-7.1, which would require the SUMC Project sponsors to incorporate “transit centers”, which must be off-street facilities that accommodate three to four buses simultaneously. The attached response to the City’s data request regarding transit centers explains why bus stops at the new Hospital and at the Hoover Pavilion would be designed as on-street stops, and also explains why three to four buses would not queue at the bus stops. Existing transit centers are located nearby at PAIS and Stanford’s Parking Structure 5 on Oak Road. In order to accommodate additional ridership in the SUMC, the proposed Project includes “enhanced bus stops,” providing riders with shelter, seating, lighting, signage, maps, bus lines served, bus schedules, and bike parking as necessary. The requirement for two “transit centers” as defined in this mitigation measure is not warranted.

On pages 3.4-80 and 3.4-81, the Draft EIR identifies Mitigation Measure TR-7.2, which would require the SUMC Project sponsors to make fair-share contributions to a variety of transit providers. The Project sponsors provide the following comments on the feasibility of these measures:

* Measure TR-7.2 suggests that the SUMC Project sponsors make a financial contribution to expand Marguerite shuttle service “into Palo Alto.” The Marguerite shuttle service links the campus, SUMC, and Palo Alto intermodal transit center in Palo Alto. The Project sponsor’s Development Agreement proposal to provide Caltrain Go Passes to Hospital employees includes an offer to expand Marguerite shuttle service between the SUMC and the Palo Alto intermodal transit center.

* Measure TR-7.2 suggests that the SUMC Project sponsors make a financial contribution toward the operation of the U-Line. Stanford already makes a financial contribution toward operation of the U-Line and works with AC Transit to ensure service is sufficient.

* Measure TR-7.2 suggests that the SUMC Project sponsors contribute the Project’s fair share of Palo Alto’s share of expanded VTA Community Bus Service. The mitigation measure does not reveal how the Project’s fair share could or would be calculated. Because the VTA Community Bus Service does not serve the SUMC, the SUMC Project would not result in any increase in ridership on this bus line.

* Measure TR-7.2 suggests that the SUMC Project sponsors pay into the Menlo Park shuttle fee. The SUMC Project sponsors will explore the amount and feasibility of such a payment with Menlo Park.

On pages 3.4-83 and 3.4-84, the Draft EIR identifies an impact related to emergency access. Mitigation Measure TR-9.1 would require the Project sponsors to pay a fair-share contribution to the City of Palo Alto for an Opticom system at all significantly impacted intersections. The Final EIR should clarify that this measure is only required to the extent intersections would be significantly affected after mitigation. As we understand it, no intersections in the City of Palo Alto would have significant effects after implementation of adaptive signal timing, fair-share payment toward undercrossings, and enhanced TDM measures.

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
Air Quality

The Draft EIR describes the significance threshold proposed for approval by the Bay Area Air Quality Management District. On June 2, 2010, the BAAQMD adopted significance thresholds for evaluating air quality impacts under CEQA. On its website, the BAAQMD states: “It is the Air District’s policy that the adopted thresholds apply to projects for which a Notice of Preparation is published, or environmental analysis begins, on or after the applicable effective date.” Thus, the new thresholds are not intended to apply to the SUMC Project.

On page 3.5-20, the Draft EIR concludes that provision of the Caltrain Go Pass to Hospital employees would not be sufficient to reduce emissions of criteria pollutants to less than significant levels. The Final EIR should clarify that provision of the Caltrain Go Pass would reduce emissions from employee vehicle trips by 44.5 percent. The significant impacts on air quality would be due to trips by patients and visitors, which the Draft EIR recognizes (p. 3.5-18) may occur somewhere in the Air Basin whether or not the Project is constructed. (Patients would be expected to seek medical care elsewhere if these hospitals were not expanded.)

The Draft EIR (p. 3.5-20) states that “the City shall consider the feasibility of Mitigation Measure PH-3.1,” as identified in the Population and Housing chapter. Please see our comments below regarding this mitigation measure. Provision of housing for Hospital employees would not reduce vehicle emissions from patient and visitor trips. Further, dedicating housing on the Stanford campus to Hospital workers rather than to the campus population would not substantially reduce vehicle miles traveled and associated vehicle emissions.

On page 3.5-26, the Draft EIR states that because the SUMC Sites are near East Palo Alto, where cancer risk has been found to be higher than average, cancer risk from the Project was considered cumulatively considerable even though the health risk that the Project poses on the local population is relatively small (10 in a million) in comparison to the background risk from toxic air contaminants of more than 700 in a million. Since publication of the Draft EIR, the BAAQMD has published a methodology for evaluating cumulative health risks. We ask that the City use the BAAQMD’s published methodology to provide an assessment of cumulative health risk given that the Draft EIR did not use a quantitative method to assess cumulative health risk.

Climate Change

Please see the attached memorandum from our legal counsel regarding the calculation of business-as-usual and SUMC Project emissions. We ask that the City’s consultants recalculate business-as-usual and Project greenhouse gas emissions as described in the attached memorandum. [Attachment 4]

On page 3.6-31, the Draft EIR recognizes that the SUMC Project sponsors would design the new Hospital buildings to use 35 percent less energy than typical hospitals, and would design the new School of Medicine to use 30 percent less energy than buildings constructed to 2004 Title 24 energy efficiency standards. These are extraordinary measures given the difficulty in conserving energy in buildings that are in operation 24 hours per day. The Project sponsors are leaders in sustainable construction and operation, and are designing the Project components to be as energy efficient as feasible.

Nevertheless, the Draft EIR states that these measures do not comply with the City Climate Protection Plan Policies because an audit would be necessary to verify compliance. While the Project sponsors do not object to a commissioning audit to verify that new buildings are operating as designed, the Draft EIR should clarify that the energy efficiency Project design features are consistent with the Climate Protection Plan policies and further the City’s goals.

On pages 3.6-32 and 3.6-54, the Draft EIR identifies Mitigation Measure CC-1.1, which would require new buildings to undergo commissioning of energy and HVAC systems during construction and on an annual basis during the first five years of operation. The industry standard practice is to conduct a commissioning audit one year after construction is complete. The audit is intended to determine whether the building’s energy and HVAC systems are operating as designed. Adjustments to the systems are then implemented based on the results of the commissioning audit. Commissioning is not performed during construction, nor is it necessary to repeat the commissioning process annually for five years. Once the building systems are operating as designed, they would continue to do so. Commissioning would cost several million dollars. We ask that the measure be revised to specify the commissioning would occur once, one year after each new building has been constructed.

On page 3.6-33, the Draft EIR identifies a City Climate Protection Plan Policy to expand use of renewable energy installed or purchased directly by customers. The City has a goal of reducing the carbon intensity of its energy supply. The Draft EIR states that the SUMC Project sponsors must participate in the Palo Alto Green Energy Program in order to be consistent with this policy. However, participation in the Palo Alto Green Energy Program is voluntary. Participation by an individual project applicant is not required by the City’s Climate Protection Plan.

Further, on page 3.6-55, the Draft EIR identifies Mitigation Measure CC-1.2, which would require the SUMC Project sponsors to participate in Palo Alto Green or otherwise provide renewable power such that a minimum of 54,640 MWh of electricity usage is offset annually. As explained in the attached memorandum, we believe the Draft EIR overstates Project energy usage. Further, this measure does not recognize the extraordinary steps that the Project sponsors are taking to reduce energy use at new buildings compared with a business-as-usual scenario.

On page 3.6-33, the Draft EIR explains that the City Climate Protection Plan has a policy to participate in and promote greenhouse gas emissions inventory tracking and reporting. The Draft EIR recognizes that the SUMC Project sponsors have prepared an inventory of existing and future greenhouse gas emissions. The Draft EIR states that an annual inventory of greenhouse gases is necessary for the Project to be consistent with the Climate Protection Plan. The Climate Protection Plan does not appear to require annual reporting by individual Project applicants in order to achieve consistency.

On page 3.6-35, the Draft EIR states that the City Climate Protection Plan includes a policy to offer additional public shuttles. This provision appears to apply to the City rather than to the
Community. In any event, Stanford provides an extensive public shuttle system and expands the system as needed to serve demand. The SUMC Project sponsors have offered as part of a Development Agreement to expand the Marguerite shuttle service to correspond to the increase in ridership generated by provision of Caltrain Go Passes to Hospital employees.

On page 3.6-45, the Draft EIR states that the City Climate Protection Plan includes a policy to expand implementation of Zero Waste programs. The Draft EIR recognizes that the SUMC Project includes extensive waste reduction programs. However, the Draft EIR states that an audit would be necessary to ensure compliance with this policy. The City Climate Protection Plan does not appear to require individual businesses to prepare and submit waste reduction audits.

On pages 3.6-45 and 3.6-55, the Draft EIR identifies Mitigation Measure CC-1.4, which would require the SUMC Project sponsors to conduct a waste reduction audit annually. Annual audits are unwarranted. The Hospitals and School of Medicine are leaders in waste reduction and recycling programs. While the Project sponsors do not object to a one-time audit once Project construction is complete, repeated audits on an annual basis would be unnecessarily costly.

On page 3.6-57, the Draft EIR states that Population and Housing Mitigation Measure PH-3.1 identifies further measures that would reduce vehicle miles traveled by improving the city jobs-to-employed-residents ratio. Please see our comments on this mitigation measure, below. Most of the greenhouse gas emissions associated with vehicle miles traveled are from patient and visitor trips. Such trips likely would occur whether or not the proposed Project is approved, and would not be reduced by providing housing in Palo Alto. Provision of the Caltrain Go Pass would reduce employee vehicle miles traveled by 44.5 percent. If housing were provided as suggested under the Village Concept Alternative, vehicle miles traveled and associated greenhouse gas emissions would decrease by less than one percent.

Biological Resources

Please see the attached spreadsheet and diagrams identifying Protected Trees and trees that the City has determined are biological and aesthetic tree resources. [Attachment 5]

We have worked closely with City staff to identify Protected Trees on the SUMC Project sites and to design a Tree Preservation Alternative to protect all of the trees identified by the City as important biological and aesthetic resources. The Project sponsors have a long track record of tree protection and preservation, as evidenced by the large number of mature trees on the Project sites and on the Stanford campus. Our comments on the Draft EIR’s tree protection process and mitigation measures are provided in the context of our mutual commitment to tree protection.

On page 3.9-25, the Draft EIR describes the components of the Hospital District zoning that City staff proposes in order to address protected trees. The new zoning district would create two categories of trees within the SUMC. As we understand it, a biological tree resource would be a tree that meets the existing tree ordinance’s definition of a Protected Tree. An aesthetic tree resource would be a tree that also has a substantial aesthetic value as determined by the City.

We suggest that the Final EIR identify the trees within the SUMC Project sites that the City has determined to be biological and aesthetic tree resources.

We understand that under the new zoning district, the SUMC Project sponsors would be allowed to relocate or remove a tree that is a biological tree resource, but not an aesthetic tree resource. If such a tree is removed, the new zoning would require replacement in conformance with the City’s Tree Technical Manual. Due to the constraints of the SUMC Sites, such replacement could be accomplished through payment into a Tree Fund.

On pages 3.9-26 to 3.9-29, the Draft EIR identifies Mitigation Measures BR-4.1 through BR-4.5, which would require preservation and replacement of Protected Trees. Please see the attached suggested revisions to these measures. [Attachment 6] We have suggested clarifications that would identify the process to be followed to obtain City approval of tree preservation plans, relocation, and removal. In each case, we suggest that the City Planning Director retain approval authority after consultation with the City Urban Forester.

On page 3.9-26, the Draft EIR identifies Mitigation Measure BR-4.1, which would require implementation of tree preservation measures for Protected Trees that will be retained on site. The Project sponsors will take all necessary steps to preserve Protected Trees. However, the measure includes the following sentence: “The SUMC Project shall be modified to address recommendations identified to reduce impacts to existing ordinance-regulated trees.” In the context of this measure, we understand that the potential modifications would be those pertaining to the method for conducting work in dripline areas and ensuring that landscaping does not adversely affect the health of preserved trees. Such measures are addressed elsewhere in the mitigation measure. Accordingly, we ask that the Final EIR omit the sentence quoted above.

On pages 3.9-26 and 3.9-27, the Draft EIR identifies Mitigation Measure BR-4.2, which would require the SUMC Project sponsors to prepare Solar Access Studies on Protected Oaks. We understand that this measure was intended to address trees that would be preserved in their existing locations, and which the City determines are biological and aesthetic tree resources. We have submitted Solar Access Studies for Tree 608 and the grove of trees near FM41. We had understood that the City Urban Forester considered the Solar Access Studies to be acceptable. Accordingly, we have suggested modifications to this measure to identify the applicable trees and to recognize that the content of the Solar Access Studies should be similar to the study prepared for Tree 608. We also have proposed revisions to the approval procedure, given the SUMC Project review process. Finally, we have proposed that if the Solar Access Study shows that a tree that is a biological and aesthetic tree resource is likely to be lost due to reduction in solar access, the Project sponsors will be required to relocate the tree.

On page 3.9-27, the Draft EIR identifies Mitigation Measure BR-4.3, which requires implementation of a tree relocation plan for Protected Trees that will be relocated. Based upon meetings with City staff, the Project sponsors have agreed to relocate Protected Trees that are much larger than the trees that Stanford normally relocates. Relocation of these trees will require specialized equipment, at a cost of approximately $100,000. The tree relocation specialist
recommended by the City has stated that he cannot guarantee that the relocated trees will survive; however, the tree relocation specialist will specify protective measures to increase the likelihood of success. The Project sponsors are willing to bear the cost estimated by the tree relocation specialist and take the steps recommended to protect the relocated trees. However, it is unreasonable to require that the Project sponsors expand extraordinary sums relocating Protected Trees, only to be required to spend large sums yet again should the tree fail to survive despite implementation of all recommended protective measures. We have suggested a revision to the measure to require that, should a relocated tree fail to survive despite implementation of all recommended measures, the Project sponsors must replace the tree with a 24" box tree of the same variety.

On page 3.9-27, the Draft EIR identifies Mitigation Measure BR-4.4, which would require a tree security deposit. Given the ongoing control that the City will have under the Project conditions of approval, as well as the fact that the Project sponsors will continue to operate the proposed Project after construction (as compared to a developer who may sell the project to others), we do not believe that the posting of a security bond is warranted. The City will be able to enforce the tree protection conditions and requirements through the Project conditions.

On page 3.9-27, the Draft EIR identifies Mitigation Measure BR-4.5, which would require replacement for the loss of publicly owned trees. We suggest that an additional measure be added in place of the tree security deposit, above, that would require replacement for the loss of any Protected Tree within the Project sites. We have included a proposed measure in our suggested revisions.

On page 3.9-28, the Draft EIR identifies Mitigation Measure BR-4.6, which would require design modifications to preserve trees that are biological and aesthetic resources. As drafted this measure is unclear. We have suggested revisions to clarify that it applies to trees that are biological and aesthetic tree resources near FIM 1 and Tree # 608. The Tree Preservation Alternative includes the necessary modifications, and also preserves trees on Kaplan Lawn.

On page 3.9-29, the Draft EIR states that the Santa Clara Valley HCP is the nearest adopted HCP/NCCP in the region. Please note that the Santa Clara Valley HCP has not yet been adopted.

Population and Housing

On page 3.13-15, the Draft EIR points out that an increase in the City’s jobs to employed residents ratio is not, itself, an environmental impact. While we agree with this general statement, we would like to clarify some of the statements in the Draft EIR text regarding the jobs to employed residents analysis.

The Draft EIR (p. 3.13-15) states that the SUMC Project would generate employment in excess of what is currently contemplated by the City. While it is correct that the Project would generate higher employment on the Project sites than might be anticipated under current zoning, facts in the record also support a conclusion that the Project would not generate higher citywide employment than is contemplated in the City’s Comprehensive Plan and the Association of Bay Area Governments employment projections for Palo Alto.

As explained on pages 3.2-6 and 3.2-7 of the Draft EIR, Comprehensive Plan Policy L-8 directs the City to maintain a limit of 3,257,900 square feet of new non-residential development based on a 1989 Transportation Study that analyzed employment growth throughout the City. The Draft EIR (p. 3.2-7) explains that non-residential development in the particular area in which the SUMC Project is located “has exceeded the anticipated growth by 6,966 square feet.”

However, the Draft EIR (pp. 3.2-6 and 3.2-7) states that “on a citywide basis, there is 2,367,442 square feet of development potential remaining under the Comprehensive Plan development cap . . .”

On page 3.13-6, the Draft EIR presents the Association of Bay Area Governments projections for employment growth in the City of Palo Alto sphere of influence. Based on the City’s Comprehensive Plan, ABAG’s Projections 2005 predicted 13,210 new jobs by 2025. The Draft EIR (p. 2-48) estimates that the SUMC Project would generate 2,242 new jobs by 2025.

In addition to quantifying job creation resulting from the proposed Project, the Draft EIR (p. 3.13-17) refers to a “0.01 threshold” for assessing an increase in jobs to employed residents. We ask that the Final EIR note that the City’s Comprehensive Plan does not contain a numeric goal for the City’s jobs to employed residents ratio. To our knowledge such a numeric threshold is not found in any formally adopted City of Palo Alto policy document. Further, to arrive at a conclusion that the SUMC Project increases the City’s jobs to employed residents ratio, the Draft EIR compares conditions in 2025 without the Project to conditions with the SUMC Project. If the comparison were to existing conditions, the jobs to employed residents ratio would decrease in 2025.

The Draft EIR (p. 3.13-15) states that if the City’s planning goals are not obtained, environmental impacts could result such as increased vehicle miles traveled, increased traffic congestion within interjurisdictional roadways, and increased vehicular air and noise emissions. We offer the following clarifications with regard to the specifics of the SUMC Project:

- Provision of the Caltrain Go Pass to both existing and future Hospital employees, along with associated expansion of the Marguerite shuttle, signal timing improvements, and intersection improvements at four intersections, will reduce traffic congestion at all interjurisdictional intersections to less-than-significant levels.

- The majority of vehicular air emissions resulting from the SUMC Project are from patient and visitor trips, rather than from employee trips. Provision of the Caltrain Go Pass will reduce employee trips and associated air emissions by 44.5% compared to Project conditions without the Go Pass.

\[\text{Based on its review of the legislative history of Comprehensive Plan Policy L-8, City planning staff has concluded the policy was not intended to limit growth at the SUMC.}\]
After taking the Go Pass into account, provision of housing for Hospital workers would decrease vehicle miles traveled by less than 1%. The SUMC Project does not result in significant noise impacts associated with workers commuting to and from the Project sites. The only significant noise impact from vehicular traffic is due to ambulance trips, which would not be addressed by providing housing.

We also point out that while jobs to employed residents may be one metric to assess effectiveness of smart growth principles, other factors also come into play. In this case, the Project sites are located near a Caltrain station, and the sites are served by an extensive free shuttle network, with shuttles timed to meet arriving and departing trains. The Hospitals provide a robust travel demand management program, which would be enhanced by provision of the Caltrain Go Pass. A large number of Hospital workers live in close proximity to transit. Increasing density at sites proximate to, and linked to transit, is consistent with smart growth principles.

The draft EIR identifies Mitigation Measure PH-3.1 for consideration as possible additional mitigation for impacts to air quality and climate change. The draft EIR (p. 3.13-19) recognizes that the mitigation "is not directly required in order to mitigate a significant environmental impact" of the SUMC Project. The Project sponsors offer the following comments on the feasibility of the mitigation measures:

- Measure PH-3.1 suggests the City could explore amending the Zoning Code to permit more residential uses, particularly multifamily residential use. We understand that the City is in the process of updating the Housing Element of its Comprehensive Plan. Zoning revisions generally would follow adoption of an updated Housing Element.
- Measure PH-3.1 suggests that the SUMC Project sponsors could ensure that a specified number of housing units in the County be dedicated to SUMC employees. The Hospitals, which are the only Project sponsors proposing Project components that would increase employment, do not own or control any sites within the County upon which housing units could be constructed or dedicated. Further, to the extent housing sites on the Stanford campus were dedicated to Hospital employees, an amendment to Stanford’s General Use Permit would be required. The General Use Permit does not authorize Stanford to house Hospital employees who are not Stanford students or staff on the Stanford campus. In addition, if housing on the Stanford campus were dedicated to Hospital employees rather than the University population, fewer housing units would be available under the General Use Permit for University faculty, staff, and students. As explained further, under the comments on the Village Concept Alternative, displacement of housing for the University population would not result in substantial environmental benefits. This measure also would not change the jobs to employed residents ratio in the City of Palo Alto.
- Measure PH-3.1 suggests that the City could amend the Zoning Code to remove the Hospital exemption from payment of the affordable housing fee. The existing exemption reflects a legislative policy determination that certain uses (churches, hospitals, convalescent facilities, and public facilities) provide community benefits that are on par with the provision of affordable housing. Such an exemption is consistent with policies in other jurisdictions. In this case, as part of a Development Agreement, the Hospitals have offered $23 million to the City for affordable housing, which would be the amount they would have to pay if they were subject to the City’s affordable housing fee.

The Comprehensive Plan establishes that the City’s process for addressing the housing needs that result from non-residential development projects is to make periodic legislative adjustments to its citywide housing impacts fee. The Comprehensive Plan does not call for extending the affordable housing fee to hospitals or imposing ad-hoc fees on individual projects.

The Comprehensive Plan recognizes that economic growth can bring many benefits to the community, including greater tax revenues, local job opportunities, increased diversity and physical improvements. Comprehensive Plan at p. B-6 (Goal B-3). With respect to providing local job opportunities, the Comprehensive Plan recognizes that not all new jobs bring new residents to Palo Alto (discussion under Impact PH-4, under heading “Jobs to Employed Residents Ratio”). The Comprehensive Plan also encourages regulations and operating procedures that provide certainty and predictability for development projects. Id. at p. B-8 (Goal B-4). With respect to effects on housing, consistent application of the City’s housing impacts fee creates the certainty and predictability envisioned by the Comprehensive Plan.

Further, under constitutional principles of equal protection, the City cannot impose on the SUMC Project any housing requirements that exceed the requirements that apply citywide to other developers under the City’s housing impacts ordinance. There is no rational basis for singling out the SUMC Project for more demanding treatment. To the contrary, the data in the June 2008 KMA Housing Needs Analysis demonstrate that, on a per square-footage basis, the affordable housing demands resulting from the SUMC Project do not exceed the City’s housing impacts fee.

We also point out that while jobs to employed residents may be one metric to assess effectiveness of smart growth principles, other factors also come into play. In this case, the Project sites are located near a Caltrain station, and the sites are served by an extensive free shuttle network, with shuttles timed to meet arriving and departing trains. The Hospitals provide a robust travel demand management program, which would be enhanced by provision of the Caltrain Go Pass. A large number of Hospital workers live in close proximity to transit. Increasing density at sites proximate to, and linked to transit, is consistent with smart growth principles.

The draft EIR identifies Mitigation Measure PH-3.1 for consideration as possible additional mitigation for impacts to air quality and climate change. The draft EIR (p. 3.13-19) recognizes that the mitigation "is not directly required in order to mitigate a significant environmental impact" of the SUMC Project. The Project sponsors offer the following comments on the feasibility of the mitigation measures:

- Measure PH-3.1 suggests the City could explore amending the Zoning Code to permit more residential uses, particularly multifamily residential use. We understand that the City is in the process of updating the Housing Element of its Comprehensive Plan. Zoning revisions generally would follow adoption of an updated Housing Element.
- Measure PH-3.1 suggests that the SUMC Project sponsors could ensure that a specified number of housing units in the County be dedicated to SUMC employees. The Hospitals, which are the only Project sponsors proposing Project components that would increase employment, do not own or control any sites within the County upon which housing units could be constructed or dedicated. Further, to the extent housing sites on the Stanford campus were dedicated to Hospital employees, an amendment to Stanford’s General Use Permit would be required. The General Use Permit does not authorize Stanford to house Hospital employees who are not Stanford students or staff on the Stanford campus. In addition, if housing on the Stanford campus were dedicated to Hospital employees rather than the University population, fewer housing units would be available under the General Use Permit for University faculty, staff, and students. As explained further, under the comments on the Village Concept Alternative, displacement of housing for the University population would not result in substantial environmental benefits. This measure also would not change the jobs to employed residents ratio in the City of Palo Alto.
- Measure PH-3.1 suggests that the City could amend the Zoning Code to remove the Hospital exemption from payment of the affordable housing fee. The existing exemption reflects a legislative policy determination that certain uses (churches, hospitals, convalescent facilities, and public facilities) provide community benefits that are on par with the provision of affordable housing. Such an exemption is consistent with policies in other jurisdictions. In this case, as part of a Development Agreement, the Hospitals have offered $23 million to the City for affordable housing, which would be the amount they would have to pay if they were subject to the City’s affordable housing fee.

The Comprehensive Plan establishes that the City’s process for addressing the housing needs that result from non-residential development projects is to make periodic legislative adjustments to its citywide housing impacts fee. The Comprehensive Plan does not call for extending the affordable housing fee to hospitals or imposing ad-hoc fees on individual projects.

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Further, under constitutional principles of equal protection, the City cannot impose on the SUMC Project any housing requirements that exceed the requirements that apply citywide to other developers under the City’s housing impacts ordinance. There is no rational basis for singling out the SUMC Project for more demanding treatment. To the contrary, the data in the June 2008 KMA Housing Needs Analysis demonstrate that, on a per square-footage basis, the affordable housing demands resulting from the SUMC
Project are substantially less than the affordable housing demands resulting from other developments citywide. The affordable housing demand citywide, as calculated in KMA’s 2001 Housing Linkage Update Analysis, would be 38 units per 100,000 square feet of new building area. Assuming eight percent of Hospital employees would choose to live in Palo Alto, the SUMC project would result in a need for 29 affordable housing units in Palo Alto. This equates to slightly more than two units per 100,000 square feet of new building area.

Finally, if the City were to impose an ad hoc housing fee on the SUMC Project, it would have to meet constitutional requirements for nexus and rough proportionality. The Draft EIR does not provide a factual record that establishes the amount of such a fee or its relationship to SUMC Project impacts. To the contrary, the SUMC Project sponsors’ offer to pay $25 million toward the provision of affordable housing appears to more than offset the anticipated Project-related demand of 29 affordable housing units in Palo Alto.

Alternatives

The Draft EIR has identified a range of alternatives that provide the information necessary to weigh the potential environmental benefits of Project alternatives against the extent to which an alternative may not fully accomplish the Project objectives. We agree with information provided by City staff that, because the alternatives bracket the range of potential environmental impacts and benefits, City decision makers could approve modifications to Project alternatives that mix and match components of the alternatives or that do not precisely match an alternative.

As explained in the Draft EIR, none of the No Project or Reduced Project Alternatives would fully accomplish the Project objectives. The City’s hospital peer reviewer confirmed that the SUMC Project has been sized appropriately to meet the community’s health care needs in facilities designed to meet state-of-the-art design standards for infection control and patient service. Reduction in the size of the Project would impair the Hospitals’ ability to provide high quality health care services, and the School of Medicine’s ability to perform life-saving research.

Our comments focus on the Tree Preservation Alternative, Historic Preservation Alternative, and Village Concept Alternative.

Tree Preservation Alternative. The City has identified Protected Trees on the SUMC Project Site that are most important from both a biological and aesthetic perspective. Under the Tree Preservation Alternative, no trees that are both biological and aesthetic tree resources would be removed. Most of the biological and aesthetic tree resources would be preserved in place. Three would be relocated. The SUMC Project sponsors support City Council approval of this alternative.

Historic Preservation Alternative. The SUMC Project includes demolition of the 856,178-square-foot building complex designed by Edward Durrell Stone and constructed in 1959. The Historic Preservation Alternative would retain the Stone building complex, which would be used as medical clinics and research facilities. The 429,000 square feet of new medical clinic space proposed by SHC and the 414,977 square feet of new Foundations in Medicine Buildings proposed by the School of Medicine would not be constructed. Thus, the Historic Preservation Alternative would result in similar square footage as the proposed SUMC Project.

On page 5-25, the Draft EIR states that under this alternative the underground parking structure proposed at the site of the new SHC clinics would have to be constructed elsewhere. The Draft EIR identifies expansion of the parking structure at Pasteur Drive as a potential location. However, expansion of that parking structure would require removal of Protected Trees that the City has identified as aesthetic and biological tree resources at Kaplan Lawn.

On page 5-45, the Draft EIR recognizes that the provision of state-of-the-art facilities to deliver high quality health care would be significantly compromised given the significant design inefficiencies that reuse of the Stone building complex would entail. The Draft EIR states “In

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addition, the Historic Preservation Alternative would not meet the SoM objectives of providing a state-of-the-art facility to support contemporary research and optimizing the SoM’s ability to translate medical research discoveries into treatments and cures.” On pages 5-45 to 5-48, the Draft EIR details the reasons this alternative would not adequately accomplish the Project objectives.

During public meetings on the Draft EIR, suggestions have been made that rather than reuse of the Stone building complex for clinics and research facilities, the buildings could be used as office space. The SUMC Project includes only a small amount of office space within medical office and clinic buildings. There is no programmatic need to fill the 856,178-square-foot Stone building complex with offices. As explained by the City’s hospital peer reviewer, the Hospitals already have moved most administrative functions offsite. The Project does not include facilities to bring administrative functions back to the SUMC Sites. Thus, use of the Stone building complex as office space would not address the Project’s programmatic needs for new clinic and research square footage. As a result, use of the Stone building complex for office space would necessitate construction of approximately 800,000 more net new square feet than has been proposed under the SUMC Project. Under such a conceptual alternative, the 429,000 square feet of new clinic facilities for SHC and the 414,977 square feet of new research facilities for the School of Medicine that are proposed to replace the Stone building complex would need to be constructed elsewhere. This would increase impacts to visual quality, impacts associated with impervious surfaces, energy use, and traffic due to additional trips by office workers.

The same reasoning applies to the suggestion that the Stone building complex could be used for community physicians. Under the proposed SUMC Project, community physicians occupying a 40,100-square-foot building at 1101 Welch Road would be offered space at the existing Hoover Pavilion. In addition, a new 60,000-square-foot building on the Hoover Pavilion site is proposed for use by community physicians and SHC clinics. Combined, these Project components would fill only 100,000 out of the 856,178-square-foot Stone building complex. If the new 60,000-square-foot building were used exclusively for clinics, there would still be a programmatic need for an additional 369,000 square feet of new SHC clinic space and 414,977 square feet of new research facilities. This would expand the Project by 783,977 square feet, resulting in the same increased impacts listed above.

Further, use of the Stone building complex for offices or for community physicians would be detrimental to the functional site relationships at the SUMC. The Stone building complex is centrally located, adjacent to the portion of the adult Hospital to be retained, as well as to the new adult hospital. To operate a functional hospital complex, that site should be used for outpatient clinics that rely on proximity to the Hospital. Research facilities also should be proximate to the Hospital in order to promote synergies between the researchers and physicians. The community physicians who would be located at the Hoover Pavilion site are those that do not need to be located directly adjacent to the Hospital. Administrative staff can be located even further away, as demonstrated by the current Hospital operations.

Village Concept Alternative. The Village Concept Alternative adds two components to the proposed SUMC Project--linkages between the SUMC and downtown Palo Alto, and housing for SUMC workers. The SUMC Project sponsors support the linkages component as part of a Development Agreement. The SUMC Project sponsors do not support the housing component. Instead, the SUMC Project sponsors have offered to provide $23 million to be used to provide affordable housing in Palo Alto.

On pages 5-30 and 5-32, the Draft EIR states that the Quarry Road/Arboretum Drive and Quarry Road/El Camino Real housing sites on the Stanford campus in unincorporated Santa Clara County are zoned A-1-20S, Academic Reserve and Open Space. This is incorrect. The Stanford Community Plan designates the sites “Academic Campus.” Under Stanford Community Plan Policy LU-1:

The Academic Campus designation applies to lands in current or intended academic use. Academic use includes both facilities used for teaching or research activities and the wide range of uses which support academic activity, such as administrative offices, athletic facilities, student housing, and student and administrative support services. This designation is meant to provide Stanford with the opportunity to locate these uses in relation to one another according to the University’s programmatic needs.

The sites are zoned A-1, which allows university uses pursuant to a use permit. Stanford’s General Use Permit places the sites in the Quarry Development District.

General Use Permit Condition F.1 allows construction of 200 housing units on the Quarry Road/Arboretum Drive and 150 housing units on the Quarry Road/El Camino Real site for postdoctoral fellows and medical residents. Under General Use Permit Condition F.4.b, the housing units on these sites can be increased by 20 percent so long as a commensurate reduction in units is made in another campus development district. An increase in units beyond 20 percent would require an environmental assessment, along with further reduction in units elsewhere on the campus.

The General Use Permit does not allow housing on the Stanford campus where at least one of the occupants is not a member of the University faculty, staff or student population. The Final EIR should clarify that these sites are designated for postdoctoral fellows and medical residents.

On page 5-32, the Draft EIR states that the housing site at Pasteur Drive/Sand Hill Road in the City of Palo Alto is zoned PF, Public Facilities. We understand that, as part of the Sand Hill Road Project, the City zoned this Site RM-40, allowing multiple family residential units at a residential density of 40 units per acre.

On page 5-34, the Draft EIR states that it is not expected that dedication of housing at the Quarry sites on the Stanford campus to SUMC employees would displace post-doctoral fellows and graduate students off campus. This is incorrect. General Use Permit Condition F.1 authorizes construction of 3,018 housing units on the Stanford campus and allocates those units to campus population types. General Use Permit Condition F.3 provides that the distribution of housing units by type or number may deviate from the allocation in Condition F.1, but absent further environmental review and Planning Commission approval, the total number of units cannot exceed the number specified by the General Use Permit. Thus, if the Quarry housing sites were
used for Hospital employees, fewer approved housing units would be available for use by the University population.

On page 5-34, the Draft EIR states that the 420 units at the Quarry Road sites would be within the 20 percent additional allowance. The meaning of this statement is unclear. The General Use Permit allows a 20 percent deviation in housing units in a campus development district as long as a corresponding reduction is taken in another development district. General Use Permit Condition F.8 also imposes a timing requirement such that specified numbers of new housing units are constructed in sync with specified amounts of academic square footage. This requirement ensures that housing and academic square footage are constructed at a similar pace. It does not mean that the University does not have a programmatic need for housing beyond the amount needed to fulfill the timing requirement. Based on its assessment of its programmatic needs, the University applied for and received approval for 3,018 housing units. All of those units are allocated to University populations under the General Use Permit.

On page 5-34, the Draft EIR recognizes that the Community Plan and General Use Permit EIR transportation analysis applied trip generation rates specific to campus residents, including rates for postdoctoral fellows. The Draft EIR states that the trip rate of SUMC employee occupants of the housing units would differ from the trip rate for the postdoctoral fellows. We understand that SUMC employees and other household members would generate more local trips than postdoctoral fellows and other household members.

On page 5-34, the Draft EIR states that the change in trip rate for the Quarry Road housing sites is addressed in the Draft EIR. We understand that is not the case. The traffic evaluation for the Village Concept Alternative treated the housing for SUMC employees at the Quarry Road housing sites as new housing, rather than identifying the incremental difference in trip generation between housing for the campus population and housing for Hospital employees. We also understand that the traffic evaluation for the Village Concept Alternative deducted trips by the Hospital employee member of the household who could walk or take a shuttle to work. The traffic evaluation should have added a corresponding trip by the postdoctoral fellows and medical residents who would be forced to commute to campus.

On page 5-34, the Draft EIR states that the corresponding vehicle miles traveled (VMT), and air quality and noise emissions are also captured. However, the Village Concept Alternative traffic analysis fails to recognize that if members of the University population were displaced, their VMT and associated emissions would increase compared with the assumptions in the General Use Permit. The benefit of housing Hospital employees rather than the campus population is limited to a slight reduction in VMT because, on average, Hospital employees commute a slightly longer distance than University employees. This benefit may be offset by the increased trip generation from housing dedicated to Hospital employees compared with housing dedicated to the University population.

On pages 5-35 to 5-38, the Draft EIR identifies the linkage components of the Village Concept Alternative. The Project sponsors provide the following comments regarding these components:

- The Village Concept Alternative includes a new Class I bicycle and pedestrian path extending from the planned Everett undercrossing to El Camino Real. The SUMC Project sponsors have offered to fund such improvements, including landscape, lighting and signage improvements, as part of a Development Agreement.

- The Village Concept Alternative includes crosswalk markings, painting of a bike route, new paving, an ADA-accessible median refuge, and potential signal timing changes at the El Camino Real and Quarry Road intersection. All of these improvements are subject to Caltrans jurisdiction and approval. On page 5-200, the Draft EIR shows that a change in signal timing at this intersection could result in a new significant impact in the AM Peak Hour.

- The Village Concept Alternative includes new pedestrian crossings at the Stanford Barn area. The SUMC Project sponsors have offered to fund such improvements, as well as new pedestrian and bicycle pathways through the Stanford Barn area, as part of a Development Agreement.

- The Village Concept Alternative includes new and improved shuttle stops at the SUMC Sites and in the project vicinity. The SUMC Project sponsors have offered to fund such improvements, including improved bus stops on Quarry Road, as part of a Development Agreement. Please note that the transit centers described under the Village Concept Alternative correct the descriptions found under Mitigation Measure TR 7.1.

On page 5-49, the Draft EIR states that the Village Concept Alternative would meet all of the objectives of the SUMC sponsors. The SUMC Project sponsors' objectives focus on safety and the provision of high quality health care and medical research facilities. The addition of the linkage component under a Development Agreement would furthe the Project sponsors' objectives to provide efficient access to the SUMC for healthcare providers and staff, and to enhance the pedestrian and bicycle connections between the SUMC, the Stanford Shopping Center, PAITS, and nearby open space areas. The addition of the Village Concept Alternative's housing component would not further any of the SUMC Project sponsors' objectives and would be inconsistent with the Project sponsors' cost objective.

On page 5-149, the Draft EIR identifies Mitigation Measure NO-1.1, which would require steps to reduce the effects of pile-driving noise. The SUMC Project sponsors are evaluating the feasibility of this measure and will provide further information to City staff.

On page 5-199, the Draft EIR states that under the Village Concept Alternative a greater number of SUMC employees would be within walking distance of the SUMC Sites. The Final EIR should also recognize that under this alternative, fewer University postdoctoral fellows and medical residents would be within walking distance of the campus as compared with the assumptions and analysis in the General Use Permit EIR.

On page 5-200, the Draft EIR states that vehicle trip generation under this alternative would be lower than for the SUMC Project. The Final EIR should recognize that a corresponding increase in vehicle trip generation by the campus population would occur. In addition, we understand that...
housing for SUMC employees would generate more trips by non-SUMC employees than housing for the campus population.

On page 5-203, the Draft EIR identifies Mitigation Measure TR-6.1 as mitigation for impacts of the Village Concept Alternative on pedestrian and bicycle facilities. However, Mitigation Measure TR-6.1 largely duplicates the components of the Village Concept Alternative. With the linkages component, the Village Concept Alternative would not result in significant adverse impacts to pedestrian and bicycle facilities.

On page 5-203, the Draft EIR states that the Village Concept Alternative would provide the same amount of parking on SUMC Sites as the proposed Project. The Final EIR should recognize that, by displacing members of the campus population, this alternative could result in the need for additional parking for campus commuters.

On page 5-206, the Draft EIR states that the “main difference between the SUMC Project and the Village Concept Alternative is the vehicle miles traveled associated with this alternative.” The first row of Table 5-13 on page 5-206 presents VMT from the SUMC Project as 306,098 because trips by non-employee household members have been added to the Project. The SUMC Project does not include housing, therefore the figure on this row should be 275,566. With the inclusion of non-employee household members, VMT from the Village Concept Alternative would be higher than VMT from the SUMC Project.

Table 5-13 on page 5-206 shows that, with provision of the Go Pass, the Village Concept Alternative reduces employee and patient trips by less than 1% compared with the proposed Project. Similarly, Table 5-15 shows that, with provision of the Go Pass, the Village Concept Alternative reduces greenhouse gas emissions by less than 1% compared with the proposed Project.

Table 5-16 on page 5-209 incorrectly applies trips by non-employee household members to the proposed SUMC Project. This table should be revised to show that SUMC Project VMT would be 275,566.

On page 5-222, the Draft EIR recognizes that dedication of campus housing to Hospital employees under the Village Concept Alternative would not address the City’s jobs to employed residents ratio. The housing sites are in unincorporated Santa Clara County, not in Palo Alto. The Draft EIR also states that the housing site at Pasteur Drive/Sand Hill Road already would have been included in the ABAG projections. Therefore, provision of housing at this site “would not affect the SUMC Project’s impact on the jobs to employed residents ratio.”

* * * *

We appreciate the opportunity to provide comments on the Draft EIR for the SUMC Project, and look forward to the City’s continued consideration of this important project.

Sincerely,

Michael J. Peterson
Vice President, Special Projects
Stanford Hospital & Clinics
22. Stanford University Medical Center, Michael J. Peterson (letter dated July 27, 2010)

22.1 The commenter requests that on page S-7, the size of the annexation parcel should be described as 0.75 acres. The following edit has been made to the fourth sentence of the second paragraph on page S-7 in the Summary section of the Draft EIR.

A half-0.75-acre area at the northwest corner of the Main SUMC Site, just west of Pasteur Drive, is located in unincorporated Santa Clara County, and falls within the A-1 district in the County of Santa Clara Zoning Code.

22.2 The commenter requests a text change on page S-12 to state that the Development Agreement terms were proposed by the SUMC Project sponsors. The following edit has been made to the first full paragraph under the subheader “Development Agreement” on page S-12 in the Summary Section of the Draft EIR. Please note that the terms that follow the below paragraph are those proposed by the SUMC Project sponsors; the City’s supplemental terms are provided separately.

Development Agreement. A Development Agreement would be approved as part of the SUMC Project if the terms of such an agreement could be mutually agreed upon. The terms proposed by the City, the SUMC Project sponsors and amended by the City to be included in the Development Agreement are as follows:

22.3 The commenter requests a revision to page S-23 to correct the size of the Emergency Department. Footnote 20 on page S-23 has been revised as follows:

20 The 36,192-square-foot increase in ED size includes 25,000 square feet of “right-sizing” or decompression space, which refers to expanded floor area to serve as treatment space. The right-sizing or decompression trend is typically seen in modernizing hospitals as modern treatment standards require increased floor area per bed or treatment space, compared to older hospital facilities. As such, only 5,600,1192 square feet of the ED expansion would be associated with an increased level of operations.

22.4 The commenter disagrees that the Hospital District would include an inclusionary housing element. Please refer to Master Response 7 for a discussion on inclusionary housing.

22.5 The commenter requests a text change to the amendment of Policy L-8 of the Comprehensive Plan. The City has proposed to modify Policy L-8 to allow for a greater amount of square footage development at the SUMC Project Sites. As outlined on page 3.2-29 of the Draft EIR, Land Use, the policy would be amended to state that the SUMC hospital uses would not be treated as “non-residential development.” It should be noted that the EIR analyzes the effects of the square footage proposed under the SUMC Project.
Therefore, the change to Policy L-8 would not result in impacts beyond that identified in the EIR.

Not only would the area devoted to urban development remain constant, but new non-residential growth from 1989 forward would be limited to just over 3.25 million square feet. The total non-residential development in the City in 1996 was in the range of 25 million square feet. This amount of growth was analyzed in the Citywide 1989 Land Use and Transportation Study and was largely implemented through commercial downzoning. This growth limit would be observed Citywide for the term of the Comprehensive Plan. Traffic will be monitored to ensure that the intent of the limit is being achieved, though it is recognized that traffic counts are affected by both residential and non-residential growth and also by auto use behavior. Any uses identified in Map L-6 as exempt from monitoring would not count towards the area specific or citywide caps.

The following edits have been made to the first paragraph on page 3.2-29 of Section 3.2, Land Use. Please note that the last sentence in the text below is already underlined in the Draft EIR and so the additional text here is bolded and double underlined.

In addition, the City has proposed to modify Policy L-8 as follows (underlined text would be added):

Maintain a limit of 3,257,900 square feet of new non-residential development for the nine planning areas evaluated in the 1989 Citywide Land Use and Transportation Study, with the understanding that the City Council may make modifications for specific properties that allow modest additional growth. Such additional growth will count towards the 3,257,900 maximum. Stanford University Medical Center hospital, clinic, and medical school uses are not intended to be treated as “non-residential development” for the purposes of this policy; thus, additional growth in areas zoned “Hospital District” is exempt from this policy.

22.6 The commentor states that it would not be feasible to screen all construction activities from view, as required by Mitigation Measure VQ-1.1 in Section 3.3, Visual Quality. As stated on page 3.3-27 of the Draft EIR under Mitigation Measure VQ-1.1, “The intent of the [Construction Visual Improvement] plan is to aesthetically improve portions of the project site that would remain unimproved for an extended period and screen the construction zone from view by passersby along the public streets and sidewalks.” As noted by the commentor, not all areas would be completely blocked from view; however, the SUMC Project sponsors are expected to install barriers, such as fencing materials, along public sidewalks and streets. These fences, along with the other visual improvements outlined in Mitigation Measure VQ-1.1, would screen direct street views of the SUMC Sites during construction. The specifics of the Construction Visual Improvements Plan would be developed and implemented by the SUMC Project contractor(s) and approved by the
Planning Director. The City believes that construction area screening is feasible; therefore, no changes to the text are warranted.

22.7 The commentor requests a text revision to Mitigation Measure VQ-2.1. As correctly stated by the commentor, recommendations from the Architectural Review Board (ARB) regarding the final building and site plans of the SUMC Project would be forwarded to City Council for consideration.

As a result of this comment, Mitigation Measure VQ-2.1 on Table S-4 on page S-28 of the Draft EIR, and on page 3.3-39 of the Draft EIR has been revised as follows:

VQ-2.1 Adhere to City’s Architectural Review Process and Recommendations. The SUMC Project sponsors shall submit final building and site plans to the ARB prior to issuance of any development permits. Architectural Review shall assess the appropriateness of proposed demolitions, proposed building heights and massing, siting of buildings and structures, architecture and façade treatments, landscaping, circulation plans, and parking. The ARB may require alterations to any of the above project features, or the ARB may suggest new features, such as new landscaping or public art, to improve the proposed SUMC Project design. Any recommendations made by the ARB conditions required by the City Council as a result of the Architectural Review Process with respect to the design of the SUMC Project shall be implemented by the SUMC Project sponsors.

22.8 The commentor states that the City cannot require the SUMC Project sponsors to implement transportation demand management (TDM) measures without the SUMC Project sponsors’ agreement. The comment is noted. As the Draft EIR acknowledges, there is legal uncertainty as to whether the City has the authority to directly require the SUMC Project sponsors to implement traffic demand management measures, given the apparent prohibition in Health and Safety Code Section 40717.9. Notwithstanding this apparent prohibition, the City’s legal counsel has determined that the City still retains such authority (see Appendix CC of this document). The City’s legal counsel reached this conclusion after reviewing and considering the February 24, 2009 memorandum from SUMC’s legal counsel.

This EIR cannot resolve this legal disagreement over whether the City has the authority to implement such TDM measures. Should the City choose to exercise such authority, it is

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1 Jarvis, Rick W., and Benjamin P. Fay, “Stanford University Medical Center Proposed Expansion – City Authority to Impose Employee Trip Reduction Programs,” Memo to Cara Silver, City of Palo Alto Senior Assistant City Attorney, July 2, 2010. See Appendix CC of this document for full memo.
possible that the SUMC Project sponsors could file a lawsuit challenging such exercise, and it would then be for a court to resolve this legal dispute. For the purposes of this EIR, it is adequate to acknowledge this legal uncertainty. In cases where SUMC Project sponsors object to the imposition of a particular proposed TDM requirement (such as the identified potential requirement for employee use of off-site remote parking lots), the City Council should take into account this legal uncertainty as one factor in assessing the overall feasibility of imposing such a requirement as a mitigation measure. However, in cases where SUMC affirmatively proposes or otherwise agrees to a particular TDM requirement (such as implementation of the GO Pass measure), the existence of this legal uncertainty is essentially irrelevant for the purposes of CEQA. The GO Pass measure is obviously a feasible mitigation measure given SUMC’s strong statements agreeing to such a measure, even if the City does not have the legal authority to impose it without the SUMC Project sponsors’ agreement.

The comment cites language in a prior condition of approval and a prior EIR for the Stanford Cancer Center (SCC), which suggested that the City did not have authority to impose TDM measures.² The comment suggests that the same language should be used in the present EIR. However, that earlier language predates the legal opinion from the City’s legal counsel that concludes that the City does have such authority.

22.9 The commentor expresses concerns about the requirement under Mitigation Measure TR-1.6 to survey roads and repair damage during the construction period. It is anticipated that the required survey of damages would identify those damages reasonably attributable to construction activities. Periodically during construction, at an interval determined by the City of Palo Alto, roadway surveying would be conducted, the amount of deterioration and damage that is attributable to the SUMC Project construction would be estimated, and repairs would need to be made by the SUMC Project.

22.10 The commentor contests Mitigation Measure TR-1.9, which addresses maintaining roadway capacity during special events. The types of special events and their location could change between now and the time that construction of the SUMC Project is completed. The mitigation measure should be maintained. If the proposed construction would not restrict roadways for accessing special events, then this measure would not be triggered. As a result of this comment, Draft EIR text on page S-33 and on page 3.4-44, Mitigation Measure TR-1.9, is revised as follows:

TR-1.9 Conduct Additional Measures During Special Events. During major athletic events or other special events which attract a substantial number of visitors to the campus, the SUMC Project sponsors shall implement a mechanism to prevent roadway

construction activities from reducing roadway capacity during major athletic events or other special events which attract a substantial number of visitors to the campus along those roadways that would be affected by the SUMC Project and that would provide access to the athletic or other special events. This measure may require a special supplemental permit to be approved by either Santa Clara County or the City of Palo Alto prior to hosting such events during significant construction phases.

22.11 The commentor requests clarification of the “additional fee” under Mitigation Measure TR-2.1, and indicates that traffic-adaptive signal technology is already installed at specified intersections. Please refer to Master Response 6 a discussion on SUMC Project’s fair share contribution. Please also see Staff-Initiated Change 2 for a corrected discussion of the traffic-adaptive signal technology requirement.

22.12 The commentor requests clarification of the fair share costs and fees required under Mitigation Measure TR-2.2. Please refer to Master Response 6 for a discussion on SUMC Project’s fair share contribution under Mitigation Measure TR-2.2.

22.13 The commentor questions Mitigation Measure TR-2.3 and states that the specifics of this measure would be the subject of the Development Agreement since it is a voluntary measure. Please refer to Response 22.8, above. The City and the SUMC Project sponsors are negotiating Development Agreement terms to implement and clarify this measure.

22.14 The commentor questions the list of required roadway improvements under Mitigation Measure TR-2.4. Please see Staff-Initiated Change 2 for a revised discussion of the roadway improvements. The Draft EIR and Staff-Initiated Change 2 also evaluate ways to mitigate SUMC Project impacts without making physical roadway improvements. The SUMC Project impact at the El Camino Real/Page Mill Road intersection can be mitigated through traffic-adaptive signal technology and, therefore, physical roadway improvements at this intersection would not be necessary or warranted.

22.15 The commentor questions the list of the roadway improvement required under Mitigation Measure TR-2.5. Please see Staff-Initiated Change 2 for a revised discussion of the roadway improvements and intersection LOS conclusions. Also, please refer to Master Response 6 for a discussion on the SUMC Project’s fair share contribution.

22.16 The commentor objects to the imposition of remote parking lots. The comment is noted. The Draft EIR does not propose the actual imposition of a mitigation measure which would require use of remote parking by employees, although Appendix K of the Draft EIR presents remote parking facilities as a potential alternative to the proposed GO Pass measure. The comment, including its attachments (as included in this section as Letter 22b), presents various arguments as to why a remote parking mitigation measure would not
be feasible. Such arguments would only need to be considered if the City Council considers imposing such a measure, which the EIR does not propose.

With respect to the commentor’s statement that the City does not have the legal authority to impose such a mitigation measure without the SUMC Project sponsors’ agreement, refer to Response 22.8 above. For the same reasons as is set forth in a memorandum from July 2, 2010, counsel for the City is of the opinion that the City has the legal authority to require use of remote parking lots as a form of TDM. Also, please refer to Master Response 2 for a discussion of remote parking.

22.17 The commentor supports Mitigation Measure TR-4.2, as presented on page 3.4-72 of Section 3.4, Transportation. The comment is noted and no further response is necessary.

22.18 The commentor contests the conclusion that the SUMC Project would result in a traffic hazard on Welch Road. Please refer to Master Response 5 for a detailed discussion of the connection between Pasteur Drive and Roth Way.

22.19 The commentor contests the requirement under Mitigation Measure TR-4.1 to conduct further studies for the connection between Pasteur Drive and Roth Way. Please refer to Master Response 5 for a detail discussion of Mitigation Measure TR-4.1.

22.20 The commentor states that the Draft EIR does not identify any SUMC Project component that would impede existing or planned bicycle and pedestrian facilities. As indicated on page 3.4-76 of the Draft EIR, the SUMC Project would result in increased bicycle and pedestrian activity in and around the SUMC Sites. In addition, the SUMC Project would generate 10,061 daily vehicular trips, before mitigation. An increase in bicycle and pedestrian travel, and traffic volumes, plus the associated intersection congestion caused by higher traffic levels, could result in increased traffic-related hazards to pedestrians and cyclists.

22.21 The commentor states that the Draft EIR on page 3.4-76, under Impact TR-6, does not relate to the City’s significance standard. The City’s standard on page 3.4-31 of the Draft EIR states that the SUMC Project would result in the significant impact if it would “result in increased traffic related hazards to pedestrians and bicyclists as a result of increased congestion.” As indicated on page 3.4-76 of the Draft EIR, the SUMC Project would result in increased bicycle and pedestrian activity in and around the SUMC Sites. In addition, the SUMC Project would generate 10,061 daily vehicular trips, before mitigation. An increase in bicycle and pedestrian travel, and traffic volumes, plus the associated intersection congestion caused by higher traffic levels, could result in increased traffic-related hazards to pedestrians and cyclists. As such, the conclusion is related to the significance standard.

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3 Jarvis, Rick W., and Benjamin P. Fay, “Stanford University Medical Center Proposed Expansion – City Authority to Impose Employee Trip Reduction Programs,” Memo to Cara Silver, City of Palo Alto Senior Assistant City Attorney, July 2, 2010. See Appendix CC of this document for full memo.
22.22 The commentor notes that aspects of Mitigation Measure TR-6.1 would be subject to Caltrans approval and would result in a new significant impact in the AM Peak Hour. Please refer to Master Response 6 for revisions to this measure.

22.23 The commentor states that the SUMC Project sponsors have offered to fund a bicycle and pedestrian connection between the SUMC Sites and Stanford Shopping Center. While the SUMC Project sponsors have offered to fund a bicycle and pedestrian connection between the SUMC Sites and Stanford Shopping Center, the City is nonetheless retaining this provision as a mitigation measure to ensure its implementation. Final Development Agreement terms have yet to be negotiated. Please refer to Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

22.24 The commentor states that the SUMC Project sponsors have offered to fund a connection from the planned Everett Avenue bicycle and pedestrian undercrossing to the El Camino Real/Quarry Road intersection. While the SUMC Project sponsors have offered to fund a connection from the planned Everett Avenue bicycle and pedestrian undercrossing to the El Camino Real/Quarry Road intersection, the City is nonetheless retaining this provision as a mitigation measure to ensure its implementation. Final Development Agreement terms have yet to be negotiated. Please refer to Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption as well as Master Response 6 for a discussion of fair share calculations to the cost of transportation-related mitigation measures.

22.25 The commentor points out that the requirement under Mitigation Measure TR-6.1 for a bicycle and pedestrian route through the Arboretum is beyond the City’s jurisdiction. Mitigation Measure TR-6.1 identifies measures to reduce the hazards from the SUMC Project’s impacts on bicyclists and pedestrians. These measures include installing a variety of improvements to the bicycle and pedestrian network in the immediate vicinity of the SUMC Sites. One identified improvement would be to provide a bicycle and pedestrian trail through the Arboretum Drive as part of future campus planning in the vicinity of the SUMC Sites. Upon further review, the City has determined that this measure would not be necessary to mitigate the SUMC Project’s impacts. Under existing conditions, there is already bicycle and pedestrian access through this portion of the campus, although not formally designated as such. It should be noted that Stanford’s bike plan does call for making similar improvements, and such improvements may make sense from a general planning perspective, but those improvements are not necessary to mitigate any impact of the SUMC Project. Given the above discussion, Draft EIR text has been revised, as shown in Master Response 6.

22.26 The commentor points out that continuous sidewalks exist along Quarry Road and that the SUMC Project sponsors have offered to fund enhancements to bus stops along Quarry Road. Please refer to Master Response 6 for changes to Mitigation Measure TR-6.1.
22.27 The commentor questions whether the 12-foot-wide crosswalks and other improvements under the second to last bullet under Mitigation Measure TR-6.1 are feasible or desirable. Mitigation Measure TR-6.1 requires that 12-foot-wide crosswalks be provided at El Camino Real/Quarry Road and other intersections along Vineyard Lane, Quarry Road, and Welch Road, along with color concrete or diagonal striping, pedestrian pushbuttons, and countdown pedestrian signals. All of these improvements are considered feasible and desirable to maximize pedestrian travel in and around the SUMC Project. Other improvements, such as median refuge areas and advance warning devices, are suggested to be installed on a case-by-case basis during the design process.

22.28 The commentor indicates that the SUMC Project sponsors will include installation of Class I and Class III bicycle parking spaces. While the SUMC Project sponsors have indicated that they will include installation of Class I and Class III bicycle parking spaces, the City is nonetheless retaining this measure as a mitigation measure to ensure its implementation.

22.29 The commentor questions the validity of the Draft EIR’s conclusion regarding transit. Please see Staff-Initiated Change 1 for discussion of the quantified transit analysis.

22.30 The commentor states that the SUMC Project sponsors have offered to provide increased Marguerite shuttle service as part of the Development Agreement. Refer to Master Response 1 for a discussion of the GO Pass mitigation measure and required steps in the event that mode splits are not accomplished. In addition, please refer to Master Response 12 for a description of the Development Agreement.

22.31 The commentor notes the Draft EIR on page 3.4-78 identifies the maximum load factor for the U-Line from Ardenwood to the Stanford campus at 1.0. The commentor indicates that Stanford provides funding for this service. The Draft EIR evaluates the existing U-Line service and finds the current load factor (comparison of the number of riders to the number of seats) to be 0.94. The attractiveness of transit for long trips, such as across the Bay to the Stanford campus, is partially based on every passenger having a seat. The use of U-Line service could be negatively impacted if the load factor were allowed to exceed 1.0.

22.32 The commentor indicates that conditions for transit centers do not occur at the SUMC. Please refer to Staff-Initiated Change 1 for a discussion of transit facilities.

22.33 The commentor disputes the requirement for transit centers as mitigation and points out that the SUMC Project would provide enhanced bus stops. Please refer to Staff-Initiated Change 1 for a revised discussion on transit facilities.

22.34 The commentor questions the requirement under Mitigation Measure TR-7.2 that would require a financial contribution to expand Marguerite shuttles into Palo Alto. It is essential that Marguerite shuttle service be expanded between SUMC and PAITS as part of the GO
Pass mitigation. Please refer to Staff-Initiated Change 1 for the discussion and revision of Mitigation Measure TR-7.2.

22.35 The commentor references Mitigation Measure TR-7.2, which suggests the SUMC Project sponsors make a financial contribution to the operation of the U-Line; however, Stanford currently funds the U-Line service and works with AC Transit to ensure adequate service. The Transportation Impact Analysis (Appendix C of the Draft EIR) suggests that the appropriate mitigation for the U-Line service would be to maintain a load factor of 1.0 or less. An additional financial contribution above and beyond what Stanford already contributes would only be necessary in the event that the U-Line load factors were consistently above 1.0.

22.36 The commentor indicates that the SUMC Project sponsors intend to pay the Citywide Traffic Impact Fee under Mitigation Measure TR-7-2. The comment is noted and no response is warranted.

22.37 The commentor indicates that the SUMC Project would not result in an increase in ridership on the VTA bus line and questions the fair share contribution as required under Mitigation Measure TR-7-2. Please refer to Staff-Initiated Change 1, which concludes that contribution to the VTA service and Crosstown Shuttle would not be warranted.

22.38 The commentor indicates that they will explore payment towards Menlo Park’s shuttle fee as required under Mitigation Measure TR-7-2. Please see Staff-Initiated Change 1 for revisions to Mitigation Measure 7.2.

22.39 The commentor indicates that Mitigation Measure TR-9.1 should be clarified to specify that contribution toward an Opticom system would only be required for intersections that would be significantly impacted after mitigation. Contrary to the comment, Mitigation Measure TR-9.1 would be required for all significantly impacted intersections prior to mitigation. There would be 11 intersections that would be significantly impacted prior to mitigation. Please refer to Master Response 6 for more discussions on the SUMC Project’s fair share contribution.

22.40 The commentor correctly notes that the recently adopted Bay Area Air Quality Management District (BAAQMD) significance thresholds would not apply to the SUMC Project since the Notice of Preparation for the SUMC Project was released prior to the adoption date for the new thresholds. The Draft EIR only provides a comparison of the SUMC Project’s emissions to these new thresholds for informational purposes, and the conclusions in the EIR are based on the previously adopted BAAQMD CEQA Guidelines with the exception of cumulative impacts from TACs and fine particulate matter.

22.41 The commentor correctly notes that the provision of a Caltrain GO Pass for SUMC employees would not reduce SUMC Project emissions to a less-than-significant level, as
described on page 3.5-19 of the Draft EIR. The commentor also correctly notes that the reduction in trips associated with this measure would only apply to SUMC employee trips and not trips by patients or visitors. Patient and visitor trips are estimated to be approximately 60 percent of the SUMC Project trips. The commentor also correctly notes that these patient and visitor trips would likely occur with or without the SUMC Project, as those in need of medical treatment likely would seek treatment elsewhere in the Bay Area if the SUMC facilities were not expanded.

22.42 The commentor disputes the efficacy of Mitigation Measure PH-3.1. Please see Master Response 7 regarding the feasibility of Mitigation Measure PH-3.1. Also, as shown in Table 3.5-7 of the Draft EIR, mobile source emissions of NOX and PM10 would be significant and unavoidable. That is, with mitigation, SUMC Project trips would emit 95.69 pounds per day or 16.30 tons per year of NOx and 407.91 pounds per day or 74.44 tons per year of PM10. These emissions would exceed the applicable BAAQMD thresholds of 80 pounds per day or 15 tons per year. As such, an alternative to reduce or avoid the significant and unavoidable mobile source emissions from the SUMC Project has been evaluated. The Village Concept Alternative provides an alternative development scenario that involves nearby employee housing, which was evaluated to determine whether it could reduce the SUMC Project’s mobile-source emissions of NOX and PM10. However, as shown in the Staff Initiated Change 4, the Village Concept Alternative would result in an increase in emissions over the SUMC Project and therefore would not reduce impacts with respect to greenhouse gas emissions or NOx and PM10.

22.43 The commentor requests that a cumulative analysis of the potential health risks associated with the SUMC Project using the BAAQMD’s published methodology for cumulative health risks. Please refer to Staff-Initiated Change 3 and Appendix U of this document for a discussion of the cumulative health risks associated with the SUMC Project.

22.44 The commentor has requested that the calculations of business-as-usual (BAU) and SUMC Project emissions be revised as described in an attachment, included as Letter 22d of this section. Revisions have been made to the emission inventories as described in Staff-Initiated Change 4.

22.45 The commentor disagrees with the conclusion that the SUMC Project energy-consuming features are inconsistent with the Climate Protection Plan policies with respect to energy efficiency. Table 3.6-5 on page 3.6-31 of the Draft EIR outlines the energy efficiency measures that would be incorporated as design features under the SUMC Project. The Draft EIR concludes that an audit is necessary to verify the reductions obtained. The text in Table 3.6-5 on pages 3.6-31 and 3.6-32 has been revised as indicated in Staff-Initiated Change 4. In addition, Mitigation Measure CC-1.1 on page 3.6-54 of the Draft EIR has been revised as indicated in Staff-Initiated Change 4.
22.46 The commentor requests that Mitigation Measure CC-1.1 be revised to specify that the commissioning would occur once for each new building, the year following its construction. The purpose of Mitigation Measure CC-1.1 is to ensure that the buildings are operating at the intended design efficiency. This can be accomplished through an initial commissioning and then subsequent annual reports and does not require repeated commissioning. Therefore, Mitigation Measure CC-1.1 has been revised as indicated in Staff-Initiated Change 4.

22.47 The commentor states that the City’s Climate Protection Plan indicates that participation in the Palo Alto Green Energy Program is voluntary and not, as indicated in the Draft EIR, a requirement for the SUMC Project. Mitigation Measure CC-1.2 on page 3.6-55 of the Draft EIR, which required participation by the SUMC Project in the Palo Alto Green Energy Program, has been revised as indicated in Staff-Initiated Change 4. Under the revised Mitigation Measure CC-1.2, the SUMC Project sponsors would be required to participate in a renewable energy program, but not necessarily the City’s Palo Alto Green renewable energy program.

22.48 The commentor states that the Draft EIR overestimates the SUMC Project energy usage, and further states that the Draft EIR does not adequately recognize the efforts that the SUMC Project sponsors are taking to reduce energy use. As discussed in more detail in Staff-Initiated Change 4, the electricity usage and emissions estimates for the SUMC Project have been revised. See Staff-Initiated Change 4 for complete details. Due to these revisions, there is a reduction in estimated electrical usage for the SUMC Project from 54,640 MWh to 32,147 MWh annually.

While the Draft EIR acknowledges the energy efficiency measures applied to the SUMC Project, the SUMC Project must be compliant with each of the City’s Climate Protection Plan individual policies in order to result in less-than-significant impacts. Mitigation Measure CC-1.2, on page 3.6-55 of the Draft EIR, has been revised to require that the SUMC Project participate in a renewable energy program, but not necessarily the City’s Palo Alto Green renewable energy program, as indicated in Staff-Initiated Change 4.

22.49 The commentor indicates that the City’s Climate Protection Plan promotes inventorying and reporting of greenhouse gas emissions and does not make reporting mandatory. The Climate Protection Plan does not mandate that individual businesses inventory or report greenhouse gas emissions. However, the City has indicated that annual greenhouse gas emissions inventories for the Hospitals should be included as mitigation in order to enable the City to more accurately monitor the Citywide emissions and the effects of the Climate Protection Plan policies.
22.50 The commentor indicates that the City’s Climate Protection Plan’s policy for offering additional public shuttles appears to apply to the City rather than the community. The additional public shuttle mitigation in the City’s Climate Protection Plan applies to the City. However, the SUMC Project sponsors currently provide an extensive public shuttle system that is expanded as demand increases. Further, the SUMC Project sponsors have offered to expand the Marguerite shuttle service where increased demand would result from the implementation of the Caltrain GO Pass. Because of the SUMC Project’s potential expansion of the Marguerite shuttle service, the Draft EIR includes this policy to further demonstrate the SUMC Project’s compliance with the goals of the City’s Climate Protection Plan.

22.51 The commentor indicates that the City’s Climate Protection Plan does not appear to require individual businesses to prepare and submit waste reduction audits, while the mitigation implemented in the Draft EIR requires annual waste reduction audits. The City’s Climate Protection Plan does not require that individual businesses prepare or submit waste reduction audits. With the City’s commitment to minimizing waste generation with the ultimate goal of Zero Waste, the inclusion of the mitigation requiring an initial audit is to show that the waste reduction due to SUMC Project efficiencies is warranted. As waste reduction audits are not mandated by the City’s Climate Protection Plan, Table 3.6-5 on page 3.6-45 of the Draft EIR has been revised such that compliance with the plan is indicated; however mitigation is proposed to ensure that an audit is performed to verify the anticipated reductions are met, as shown in Staff- Initiated Change 4.

22.52 The commentor objects to the SUMC Project sponsors requirements to conduct annual waste reduction audits. Mitigation Measure CC-1.4 has been revised to remove the annual waste reduction audits, as shown in Staff-Initiated Change 4.

22.53 The commentor states that vehicle miles traveled would not be substantially reduced by providing housing in Palo Alto. Please see Master Response 7 regarding Mitigation Measure PH-3.1. Please see Staff-Initiated Change 4 for revisions to the calculation of greenhouse gas emissions and conclusions in the climate change analysis. As indicated, the SUMC Project’s greenhouse gas emissions would be more than the 30 percent below BAU, and as such, the SUMC Project would have a less than cumulatively considerable contribution to global climate change due to quantified greenhouse gas emissions. As shown in the Staff-Initiated Change 4, the Village Concept Alternative would result in an increase in emissions over the SUMC Project and therefore would not reduce impacts with respect to greenhouse gas emissions. However, both the SUMC Project and the Village Concept Alternative would have less than cumulatively considerable contributions to global climate change with mitigation. In making its decision on the SUMC Project and its alternatives, the City Council will take into consideration the benefits of the Village Concept Alternative, including the level to which this alternative would or would not reduce mobile source emissions (see Master Response 8).
22.54 The commentor states that the SUMC Project sponsors have a long track record of tree protection and preservation. The comment is noted and acknowledged by the City. Please refer to Staff-Initiated Change 6 for a description of the corrected Protected Tree numbers.

22.55 The commentor suggests that the Final EIR identify the trees within the SUMC Project Sites that the City has determined to be biological and aesthetic tree resources. Figure 5-1 in the Draft EIR has been replaced with new figures (Figures 5-1a through 5-1d), as indicated in Staff-Initiated Change 6. These figures depict the aesthetic tree resources that would be removed, retained, and relocated. Figures 5-1a through 5-1d in Staff-Initiated Change 6 compares tree removal, retention, and relocation under the Tree Preservation Alternative with the SUMC Project. Please refer to Staff-Initiated Change 6 for corrected aesthetic tree resource numbers.

22.56 The commentor summarizes their understanding of the tree replacement requirements. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.57 The commentor requests edits to Mitigation Measures BR-4.1 through BR-4.5 on pages 3.9-26 through 3.9-29 of the Draft EIR. Edits have been made to these mitigation measures, with the exception of Mitigation Measure BR-4.5. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.58 The commentor requests edits to Mitigation Measure BR-4.1, as presented on page 3.9-26 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.1. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.59 The commentor requests edits to Mitigation Measure BR-4.2, as presented on pages 3.9-26 through 3.9-27 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.2. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.60 The commentor requests edits to Mitigation Measure BR-4.3, as presented on page 3.9-27 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.3. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.61 The commentor requests the deletion of Mitigation Measure BR-4.4 as presented in the Draft EIR on pages 3.9-27 through 3.9-28. Although the City has decided not to delete the mitigation measure in its entirety, edits have been made to Mitigation Measure BR-4.4 (now Mitigation Measure BR-4.4A). Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.62 The commentor suggests an additional mitigation measure, which would require the replacement for the loss of any Protected Trees within the SUMC Sites. This mitigation measure has been added as Mitigation Measure BR-4.4B. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.
22.63 The commentor requests edits to Mitigation Measure BR-4.6, as presented on page 3.9-28 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.6. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22.64 The commentor requests a revision to the Draft EIR to reflect that the Santa Clara Valley Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) has not yet been adopted. According to the Santa Clara County, the Draft EIR/EIS for the Draft Habitat Plan was released on December 17, 2010 and the certification of the Environmental Review and the completion of the Final HCP/NCCP is expected to occur in 2011.\textsuperscript{4} Therefore, the following text edit has been made to fifth sentence of the discussion under Impact BR-5 on page 3.9-29 of Section 3.9, Biological Resources:

In September 2006, Stanford University initiated the development of the Stanford University HCP with USFWS and NOAA Fisheries. However, because the Stanford University HCP is currently out for public review and has not been adopted, it is not a currently applicable Habitat Conservation Plan or Natural Community Conservation Plan (NCCP). Until such time that the HCP is adopted, there is no requirement to comply with its provisions. In addition, the Santa Clara Valley HCP/NCCP is the nearest adopted HCP/NCCP in the region but is also in development and has not yet been adopted. Nonetheless, the SUMC Sites are not included within its boundaries of the Santa Clara Valley HCP/NCCP and it would not apply to the SUMC Project. Because no applicable adopted HCP or NCCP currently exists for the SUMC Sites, and no habitat for special-status plant or wildlife species occurs in the SUMC Sites, the SUMC Project would have no impact on any applicable HCP or NCCP.

22.65 The commentor questions whether the SUMC Project would increase jobs compared to the City’s projections. Please see Master Response 7 for a discussion of the analysis of the SUMC Project’s contribution to the City’s jobs to employed residents ratio.

22.66 The commentor questions whether the project would increase the City’s jobs to employed residents ratio. The SUMC Project can only increase the jobs to employed residents ratio because the SUMC Project does not propose to increase housing stock and the SUMC Project does not propose to increase the City’s projected employed residents. The SUMC Project only proposes to increase the “jobs” portion of the ratio. The methodology of comparing increased employment against a future scenario is appropriate under CEQA; it is comparable to the methodology in Section 3.4, Transportation, which applies a future year scenario both with and without the SUMC Project for more accurately determining impacts.

22.67 The commentor offers clarifications regarding specifics of the SUMC Project. The clarifications pointed out by the commentor are correct. Please see Master Response 7, which explains that Mitigation Measure PH-3.1 is presented in the Draft EIR for informational purposes as an alternative mitigation measure to those identified in Section 3.4, Transportation, and Section 3.5, Air Quality.

22.68 The commentor discusses the feasibility of mitigation measures. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

22.69 The commentor discusses the feasibility of mitigation measures. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

22.70 The commentor discusses the feasibility of mitigation measures. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

22.71 The commentor discusses the feasibility of mitigation measures. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

22.72 The commentor discusses the feasibility of mitigation measures. Please see Master Response 7 for a discussion of Mitigation Measure PH-3.1.

22.73 The commentor states that the amount of City open spaces outlined in the Draft EIR does not correctly add to the total. According to the City of Palo Alto Comprehensive Plan, there is a total of 16,627 acres of land in the City, approximately 40 percent of which is dedicated as parks and open space preserves. The open space preserves that are owned and operated by the City are the Baylands Nature Preserve, Esther Clark Nature Preserve, Foothills Park, and the Pearson-Arastradero Preserve. In addition, the open space preserves that are within City lands, but are operated by the Mid-Peninsula Open Space District, include Montebello Open Space Preserve and Montebello Open Space Preserve. Although the Draft EIR correctly identified the open space areas, the total acreages and percentages did not add to the correct sum, as noted by the commentor. As such, the third full paragraph on page 3.14-10, which continues to the beginning of page 3.14-11, has been revised, as shown below. These changes do not affect the analysis or the impact conclusions regarding park and open space facilities.

Approximately 30-38 percent (4,763 6,372 acres) of the City’s land area consists of open space preserves. Open space preserves provide opportunities for hiking, biking, fishing, picnicking, camping, nature study, and non-motorized boating. They also have significant ecological and aesthetic value, providing important habitat for wildlife and scenic areas. These major foothill open spaces that are owned and

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operated by the City include: the 1,940-acre John Fletcher Byxbee Recreational Area, the 1,400-acre Foothills Park; the 622-acre Pearson-Arastradero Preserve; and the 22-acre Esther Clark Park Nature Preserve. 58,59 The 12.4-acre Timothy Hopkins Creekside Park. In addition, the open space preserves that are within City lands, but are operated by the Mid-Peninsula Open Space District, include the 2,200 acres of Montebello Open Space Preserve; and the 200-acre Los Trancos Open Space Preserve.60 The Byxbee, Foothill, Arastradero, Clark, and Hopkins Parks are owned and operated by the City, while Montebello and Los Trancos are operated by the Mid-Peninsula Open Space District. 56

54  Greg Betts, Director of Community Services, City of Palo Alto Community Service, Electronic communication, October 25, 2007. 6,372 acres of open space preserves/16,627 acres of land within the City of Palo Alto = 38.3 percent = ~ 38 percent
56  Greg Betts, Director of Community Services, City of Palo Alto Community Service, Electronic communication, October 25, 2007.

22.74 The commenter agrees with the impact conclusions and analysis of the impacts related to fire protection due to the implementation of the SUMC Project, but disagrees with the suggested improvement measures. Under CEQA, the need for additional equipment and/or staff to support a public service is not considered a significant impact unless new facilities would need to be constructed to house them, resulting in physical impacts. For example, if a project would require an increase in the level of staffing at the fire department, and the existing fire house would not be not large enough to support this increase, a new, larger fire facility would have to be constructed. This new construction would result in potentially significant environmental impacts. However, the SUMC Project would not increase the need for fire services to the extent that new fire facilities would need to be constructed, therefore resulting in a less-than-significant impact.

Nonetheless, the SUMC Project would require additional fire services, just not to the degree that would result in the construction of new buildings. These additional services would have an impact on the Palo Alto Fire Department (PAFD) itself; however, under CEQA, this is not considered a physical environmental impact. As stated on page 3.14-13, the impacts to the PAFD include the need for a new ladder to serve the increased building heights at the SUMC Sites and the need for three additional full time employees.
Improvement measures are identified in the Draft EIR as a potential way to reduce the less-than-significant impacts to the PA FD, as presented on page 3.14-14. Since the impacts are not large enough to trigger the construction of new facilities, the construction of which could result in a significant impact, mitigation measures would not be warranted under CEQA. However, the City could encourage the SUMC Project sponsors to implement these improvement measures or consider imposing them as Conditions of Approval. Consideration over whether to include the improvement measures as Conditions of Approval would occur during the entitlement process rather than the environmental review process. Therefore, for the purposes of CEQA review in the Draft EIR, the improvement measures are provided as supplemental information and are not mandated, but encouraged.

One of the improvement measures, as outlined on page 3.14-14 of the Draft EIR, includes providing the PA FD with a 100-foot ladder to replace the existing 75-foot ladder. The 130-foot SHC Hospital towers would be significantly taller than the existing buildings at the SUMC Sites. Therefore, in order for the PA FD to reach the upper floors of the buildings in the event of an emergency, the PA FD has indicated that a new ladder would need to be purchased. Although more space would be needed at the fire station to house a 100-ladder truck, the PA FD has looked at the apparatus-housing capabilities at the fire stations and has determined that the current facilities are capable of handling any new equipment.8

The other improvement measure would increase the 12-hour Medical unit to a 24-hour unit and add three full time employees. The commentor questions the need for these additional medical unit employees. The calculations to determine how many new PA FD employees would be needed are based on the existing call volumes from the SUMC and square footages. The PA FD received 64 calls per year from the SUMC Sites in 2007 (the baseline condition). Based on the increase of square footage, the calls would increase to 99 calls per year. Although it is expected that many emergencies would be treated by hospital staff rather than the PA FD Medical unit, there is still a current demand for the PA FD (64 calls) and an increase in square footage, which would result in an increase of patients, employees, and visitors, is expected to result in a higher demand for PA FD staff. Therefore, as stated on page 3.14-13 of the Draft EIR, Dan Firth, former Fire Marshal of the PA FD, confirmed that three new full time employees would need to be hired.9 Although additional staff would be needed as a result of the SUMC Project, the PA FD acknowledges that the existing fire stations are capable of handling the increase in employment.10 Therefore, the need for new fire facilities would not be triggered and a less-than-significant physical environmental impact would occur.

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8 Gordon Simpkinson, Acting Fire Marshal, Palo Alto Fire Department, Planning and Transportation Commission Hearing, June 2, 2010.
9 Dan Firth, Fire Marshal, Palo Alto Fire Department, electronic communication May 9, 2008.
22.75 The commentor acknowledges that City decision-makers could approve modifications to the SUMC Project alternatives that combine components of certain alternatives. The Palo Alto City Council must ultimately certify that it has reviewed and considered the information in the EIR and that the EIR has been completed in conformity with CEQA. Following certification, it is at the discretion of the City Council whether to approve the SUMC Project as proposed, or portions of the proposed SUMC Project alternatives that would mitigate or avoid significant environmental impacts, while rejecting the alternatives that are deemed to be infeasible. Nonetheless, if it is determined that any impacts would be significant and unavoidable, a Statement of Overriding Considerations would be prepared. Refer to Master Response 8 for a description of the alternatives and variations to the proposed alternatives. Also refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review.

22.76 The commentor does not support the No Project or Reduced Project Alternatives. Per CEQA Guidelines Section 15126.6, an EIR must include a range of feasible alternatives that obtain most of the project objectives and reduce the significant and unavoidable impacts of the proposed project. In addition, CEQA Guidelines Section 15126.6(e) requires the inclusion of a “no project” alternative in order to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. Therefore, the SUMC Project Draft EIR analyzes seven alternatives, including two No Project and two Reduced Intensity Alternatives. This comment concerns the merits and feasibility of the SUMC Project alternatives and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

22.77 The commentor states that no trees that are both biological and aesthetic tree resources would be removed under the Tree Preservation Alternative. Please see Staff-Initiated Change 6 for corrected numbers under the SUMC Project and Tree Preservation Alternative. The Tree Preservation Alternative would result in the relocation of three aesthetic tree resources (while retaining 15 of these trees). No Protected Trees that are aesthetic tree resources would be removed under this alternative. Up to 59 Protected Trees (which are not aesthetic tree resources) would be removed, which is less than the 74 Protected Trees removed under the SUMC Project.

In addition, the commentor expresses support for the Tree Preservation Alternative. It is acknowledged that the Tree Preservation Alternative is the SUMC Project sponsors’ preferred alternative. Nonetheless, this comment concerns the merits of the SUMC Project alternatives and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.
The commentor states that extending the parking garage below Kaplan Lawn under the Historic Preservation Alternative would impact aesthetic tree resources Protected Trees. As stated on page 5-25 in Section 5 of the Draft EIR, Alternatives, the Historic Preservation Alternative would need to relocate the underground parking lot proposed at the site of the new SHC clinics (under the SUMC Project) to a different location. This parking could potentially be accommodated by expanding the existing Pasteur Drive garage and/or increasing the size of the proposed SHC parking structure at the corner of Welch Road and Pasteur Drive.

Since the exact site plans for the Historic Preservation Alternative are unknown at this time, it is too speculative to determine the exact location of the parking garage. As stated by the commentor, expanding the existing Pasteur Drive garage would require the removal of the Protected Trees in Kaplan Lawn. Although this would result in a further significant and unavoidable impact to Protected Trees, it would more importantly, for the purposes of the Historic Preservation Alternative, affect the historic integrity of the area. This would result in a significant, and potentially unavoidable, impact to the Stone Building complex and its surroundings. Therefore, the efforts of the Historic Preservation Alternative would not succeed in retaining the historic integrity of the building.

As explained on page 5-178 of the Draft EIR, the Pasteur Drive configuration and landscaping were an important part of E.D Stone’s original Master Plan. The construction of the subterranean parking structure below the Pasteur Mall would likely require dismantling and reconstruction of the fountain in the western forecourt, which has been identified as a character-defining feature. In addition, the parking garage would require the removal of the biological and aesthetic tree resources in Kaplan Lawn. The vehicular and pedestrian approach to the Stone Building complex along Pasteur Drive contributes to the overall feel and integrity of the area. Therefore, removal of the fountain and the Kaplan Lawn trees would significantly compromise E.D. Stone’s Master Plan layout, existing open spaces, landscape features, and the immediate setting of the Stone Building complex.\(^\text{11}\)

Due to the potentially significant and unavoidable cultural and biological resource impacts, the following edit has been made to the last sentence of the last bullet on page 5-25:

The parking lots proposed under the SUMC Project that would be constructed under the Historic Preservation Alternative would include the SHC parking structure as proposed under the Tree Preservation Alternative (with three levels underground and four levels aboveground) at the corner of Welch Road and Pasteur Drive, the underground LPCH parking structure at the corner of Welch Road and Quarry Road, and the Hoover Pavilion parking structure. However, the underground parking lot proposed at the site of the new SHC clinics would have to be constructed elsewhere.

since it would be located under the 1959 Hospital Building complex. This parking would instead be accommodated elsewhere at the Main SUMC Site, including potentially expanding the existing Pasteur Drive garage and/or increasing the size of the proposed SHC parking structure at the Welch Road/Pasteur Drive intersection.

22.79  
*The commentor argues that reusing the Stone Building complex as office space, instead of clinics and research facilities as proposed in the Draft EIR, is not feasible.* This statement pertains to a comment submitted at a public hearing. Please Refer to Master Response 8 for the range of alternatives analyzed and variations to the proposed alternatives.

22.80  
*The commentor argues that reusing the Stone Building complex for community physicians, instead of clinics and research facilities as proposed in the Draft EIR, is not feasible.* This statement pertains to a comment submitted at a public hearing. Please Refer to Master Response 8 for the range of alternatives analyzed and variations to the proposed alternatives.

22.81  
*The commentor supports the pedestrian linkages under the Village Concept Alternative but does not support the housing component.* This comment concerns the merits of the Village Concept Alternative and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

The commentor also states that the SUMC Project sponsors have offered to provide $23 million to be used towards affordable housing in the City of Palo Alto. As explained on page 2-27 of the Draft EIR, Project Description, a Development Agreement would be approved as part of the SUMC Project if the terms of such an agreement could be mutually agreed upon. One term proposed by the SUMC Project sponsors to be included in the Development Agreement is the payment of housing in-lieu fees in the amount of $23.1 million, which is equivalent to what a commercial project would pay. The Village Concept Alternative was included in the Draft EIR as an alternative to paying this in-lieu fee. See Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

22.82  
*The commentor corrects the land use designation for the Village Concept Housing Sites, as outlined in Section 5 of the Draft EIR, Alternatives.* On pages 5-30 and 5-32, the Draft EIR states that the Quarry Road/Arboretum Drive and the Quarry Road/El Camino Real housing sites are zoned A1-20S. According to the 2007 Santa Clara Zoning Atlas, these sites are zoned A1-20S, A1 with Combining District. However, the Land Use Designation for these sites, as outlined in the Stanford University 2000 Community Plan and General Use Permit (CP/GUP), is Academic Campus. The Academic Campus designation applies to lands in current or intended academic use and allows for the

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12 County of Santa Clara, Santa Clara County Zoning Atlas, Map 16, August 2007.
construction of student housing. Although the zoning was included in the Draft EIR, the Land Use Designation for the sites were not stated or explained. Therefore, the following text has been revised in the fourth paragraph on page 5-30:

The Quarry Road/Arboretum Drive site is zoned as A1-20S, 10 Academic Reserve and Open Space A1 with Combining District, per the approved Stanford Community Plan/General Use Permit Santa Clara County Zoning Atlas. Zone A1-20S is defined as lands outside of the core campus area that currently have an open space character or use, or low intensity academic use a slope density combining district with the same allowed uses as the A1 Zoning District, General Use. These lands are identified as important for their scenic beauty, visual relief, grazing, and wildlife values, as well as their academic potential. Permitted uses in the A1 Zoning District include, but are not limited to, agricultural uses, single-family residences, parks and playgrounds, home occupations, and accessory buildings to permitted uses. University uses are conditionally permitted uses. The 20S refers to the 20S Slope-Density Combining District, which regulates density of development through provisions that determine the maximum number of lots and dwelling units permitted through subdivision based on the average slope of the lot.11 This site is within unincorporated Santa Clara County, and any changes to the previously approved housing therein would require County approval.

In addition to the zoning, the Stanford Community Plan/General Use Permit has assigned the Quarry Road/Arboretum Drive Site with the land use designation of “Academic Campus.” According to Policy LU-1 of the Stanford Community Plan, “the Academic Campus designation applies to lands in current or intended academic use.” These academic uses support the academic activity of the University, including, but not limited to, student housing and administrative offices.12 In addition, the Stanford General Use Permit places the sites in the Quarry Development District.13

10 County of Santa Clara, Santa Clara County Zoning Atlas, Map 16, August 2007.
11 County of Santa Clara, Stanford University Draft Community Plan and General Use Permit Application, Final Environmental Impact Report, Certified by the Santa Clara County Board of Supervisors, December 2000.
12 Santa Clara County Planning Office, Stanford University Community Plan, adopted by the Santa Clara County Board of Supervisors December 12, 2000.

In addition, the following text has been revised in the first sentence on page 5-32 of the Draft EIR:

The Quarry Road/El Camino Real site is also zoned as A1-20S, 10 Academic Reserve and Open Space A1 with Combining District, per the approved Stanford Community Plan/General Use Permit Santa Clara County Zoning Atlas.
Plan/General Use Permit Santa Clara County Zoning Atlas\textsuperscript{14} and has a land use designation of Academic Campus per the Community Plan.\textsuperscript{1415}

\textsuperscript{14} County of Santa Clara, Santa Clara County Zoning Atlas, Map 16, August 2007.

\textsuperscript{1415} County of Santa Clara, Stanford University Draft Community Plan and General Use Permit Application, Final Environmental Impact Report, Certified by the Santa Clara County Board of Supervisors, December 2000. County of Santa Clara, Stanford University Community Plan, approved December 12, 2000.

22.83 The commentor describes housing units allowed under General Use Permit Condition F.1. The comment is noted. Please see Response 22.86, below.

22.84 The comment requests clarification on allowance of housing on the Stanford campus. In response to Comment 22.84, the following sentence is added as the last sentence to the first bullet on page 5-33 of the Draft EIR:

These two sites were approved in December 2000\textsuperscript{16} to provide a total of 420 units (350 units plus a 20 percent overage of 70 units\textsuperscript{17}) for postgraduates and/or hospital residents. More specifically, these sites are designated for postdoctoral fellows and medical residents.

22.85 The commentor states that the Pasteur Drive/Sand Hill Road housing site under the Village Concept Alternative is zoned RM-40, rather than PF (Public Facilities), as stated in the Draft EIR. The revisions suggested by the commentor are correct. As such, the second paragraph under the bullet titled “Pasteur Drive/Sand Hill Road Site” on page 5-32 of the Draft EIR has been revised as follows:

This site consists of 2.5 acres and is located on the southeast corner of Pasteur Drive and Sand Hill Road. The site is just north of the Main SUMC Site, and Sand Hill Fields is located across Pasteur Drive, to the east of the site. Currently, this site is open space and no buildings are located on the property. This site is within City of Palo Alto jurisdiction and is zoned PF, Public Facilities. A zone change to RM-40,\textsuperscript{12} which allows multiple-family residential units at a maximum residential density of 40 dwelling units/acre\textsuperscript{13} would be required for this site.

22.86 The comment discusses the CP/GUP as it relates to on-campus housing. The CP/GUP allows up to 3,018 units, but only requires that 2,420 of those units be constructed as a condition to full academic build out. As there is no regulatory requirement to build 598 units, up to 598 CP/GUP units have been identified by the City as excess units that could be the subject of a housing agreement if mutually agreed upon. Stanford asserts that the units have been “programmed” for other uses, but the CP/GUP does permit the units to be used for postdoctoral fellows and medical residents.
While the CP/GUP provides strict limits on non-residential development, including a specific development cap, it provides greater latitude for residential development. The Framework section of the CP/GUP clarifies that additional housing is exempt from the development cap. The Housing section of the CP/GUP also expressly provides that upon approval of the Santa Clara County Planning Commission and subject to further environmental assessment, additional housing beyond 3,018 units may be constructed. Read together, if the parties mutually agree, the housing can be used for hospital housing.

As stated on pages 5-34 through 5-35 of the Draft EIR, recommendations to dedicate the housing to SUMC employees would have some implications on the analysis in the CP/GUP EIR. Specifically, the CP/GUP EIR transportation analysis applied trip generation rates specific to campus residents, including graduate students and post doctoral fellows. However, the trip rate of SUMC employee occupants of the housing, as proposed under the Village Concept Alternative, would differ from the trip generation rate for graduate students and post doctoral fellows. The change in the trip rate and the corresponding vehicle miles traveled (VMT), air quality, climate change, and noise emissions are also analyzed on pages 5-198 through 5-210 of the Draft EIR.

In light of Stanford’s assertion that the units have been “programmed” for other uses, the trip generation and LOS analysis of the Village Concept Alternative has been revised since the publication of the Draft EIR. For the revisions to the analysis, refer to Staff-Initiated Change 8, which assumes displacement of the campus population could occur if GUP housing were allocated to SUMC employees. In addition, the associated changes to the climate change analysis due to adjustments of VMT have also been applied to this EIR under Staff-Initiated Change 4.

22.87 The commentor contests the approach for analyzing trip generation and intersection impacts under the Village Concept Alternative. Please refer to Staff-Initiated Change 8 for a revised trip generation analysis under the Village Concept Alternative.

22.88 The commentor states that vehicle miles traveled may increase under the Village Concept Alternative. Please see Staff-Initiated Change 4.

22.89 The commentor states that the SUMC Project sponsors have offered as part of the Development Agreement to fund a new Class I bicycle and pedestrian path extending from the planned Everett undercrossing to El Camino Real. The City is nonetheless retaining this feature as part of the Village Concept Alternative for the Council’s consideration. See Master Response 8, which discusses how the City may opt to approve components of various project alternatives in its final decision on the SUMC Project. Final Development Agreement terms have yet to be negotiated. In addition, see Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.
22.90 The comment describes Caltrans approval of roadway improvements. As indicated on page 5-35, colored bike lanes [along El Camino Real] would require Caltrans approval. The following sentence is added as the last sentence of the third paragraph on page 5-35 of the Draft EIR:

Figures 5-4 and 5-5 show the sequence of public spaces and connections. All modifications within the El Camino Real right-of-way would require Caltrans approval.

Also, the following text is added to the last sentence to the last bullet on page 5-35 of the Draft EIR:

- Evaluate of the adequacy of bicycle and pedestrian signal crossing times, and if deficient (greater than 4 feet per second crossing speed), increase time (decrease walking speed to 3.5 to 4 feet per second) and evaluate impact on peak hour intersection LOS and vehicle delay. Changes in crossing times within the El Camino Real right-of-way would require Caltrans approval.

Please refer to Master Response 6 for changes to the El Camino Real/ Quarry Road intersection component.

22.91 The commentor states that the SUMC Project sponsors have offered to include new pedestrian crossings at the Stanford Barn area as part of the Development Agreement. The City is nonetheless retaining this feature as part of the Village Concept Alternative for the Council’s consideration. See Master Response 8, which discusses how the City may opt to approve components of various project alternatives in its final decision on the SUMC Project. Final Development Agreement terms have yet to be negotiated. See Master Response 12 for further discussion of the purpose of the Development Agreement and the process for its adoption.

22.92 The commentor indicates that the SUMC Project sponsors plan to fund improved bus stops on Quarry Road, which are part of the components of the Village Concept Alternative. The commentor also points out that the transit centers described under the Village Concept Alternative correct the descriptions found under Mitigation Measure TR-7.1. Please refer to Staff-Initiated Change 1 for revisions to the requirement regarding transit centers. Please refer to Master Response 6 for revisions to the Quarry Road linkage component.

22.93 The commentor provides information regarding consistency of the SUMC Project sponsors objectives relative to the Village Concept Alternative. As such, the following revisions have been made to the first paragraph on page 5-49 of the Draft EIR:

**Project Sponsors Objectives.** The Village Concept Alternative would meet all most of the objectives of the SUMC Project sponsors because this alternative would include the SUMC Project as proposed. Development of the Village Concept Alternative would construct new hospital and medical office buildings, allowing each hospital to meet SB 1953’s criteria and to maintain its position as a leading provider of health
care. Under this alternative, SHC and LPCH would provide sufficient beds and other facilities to meet projected future growth in demand. All regional needs for emergency and disaster preparedness would be met through maintenance of SHC and LPCH. In addition, the existing SoM buildings would be replaced by the new FIM buildings; therefore, this alternative would achieve the objective of replacing outmoded research facilities with state-of-the-art research facilities to support contemporary translational research. The Village Concept Alternative also would provide sufficient faculty offices, research laboratories, and administrative support space to meet the SoM’s projected needs would maintain the opportunity to provide responsible and sustainable design for the SoM’s operating systems, water systems, and use of physical materials. In addition, The alternative could allow sufficient design and entitlement flexibility to be able to adapt to changes in medical research needs and changes in technology. In addition to meeting the objectives at the SHC, LPCH, and SoM, the Village Concept Alternative would also include pedestrian linkages, which would enhance the bicycle and pedestrian connections between the SUMC Sites, the Stanford Shopping Center, PAITS, and nearby open space areas. These linkages would further the SUMC Project sponsors’ objectives of providing efficient access to the SUMC Sites for healthcare providers and staff. As such, the Village Concept Alternative would attain all of the SUMC Project sponsors objectives.

However, the Village Concept Alternative would not meet the SUMC Project sponsors’ cost objective. Due to the housing unit component of this alternative, the cost of construction would be higher than proposed under the SUMC Project. The Village Concept Alternative would meet the majority of the SUMC Project sponsors’ objectives, but would not minimize the initial cost to the greatest extent feasible.

22.94 The commentor indicates that the SUMC Project sponsors are evaluating the feasibility of identified mitigation measures for pile driving noise under the Tree Preservation Alternative. The SUMC Project sponsors have indicated that if the Tree Preservation Alternative was selected and pile driving is used, the identified mitigation measures for pile driving are generally feasible. The SUMC Project sponsors provided suggestions for text modification to subsection (a), which are acceptable. Therefore, the additional mitigation measure for pile driving under the Tree Preservation Alternative has been revised as follows:

Draft EIR text on page 5-149, second bullet, subsection (a), has been revised as follows:

a. Require construction contractors to use noise-reducing pile driving techniques, including pre-drilling pile holes (if feasible, based on soils) to the maximum feasible depth, installing verify that manufacturer-provided intake and exhaust mufflers on pile driving equipment are present, vibrating piles into place when feasible, and installing shrouds around the pile driving hammer where feasible.
22.95 The commentor indicates that under the Village Concept Alternative, fewer University postdoctoral fellows and medical residents would be within walking distance of the campus compared to development under the CP/GUP. Please see Response 22.86. Please also see Staff-Initiated Change 8, which considers displacement of postdoctoral fellows and medical residents off campus under the Village Concept Alternative.

22.96 The commentor indicates that housing for SUMC employees would generate more trips than housing for non-SUMC employees. Please see Staff-Initiated Change 8 for a revised analysis of the Village Concept Alternative.

22.97 The commentor notes that Mitigation Measure TR-6.1 largely duplicates the components of the Village Concept Alternative. Several elements of Mitigation Measure TR-6.1 are also components of the Village Concept Alternative; however, Mitigation Measure TR-6.1 and the pedestrian linkages under the Village Concept Alternative differ slightly and have their own unique characteristics. The Village Concept Alternative would not have significant impacts to bicycle and pedestrian facilities. Please refer to CC2.26 in Section 5 of this document for a comparison of the requirements of Mitigation Measure TR-6.1 and the bicycle and pedestrian connections proposed under the Village Concept Alternative.

22.98 The commentor indicates that the Village Concept Alternative could result in the need for additional parking for campus commuters by displacing members of the campus population. The Village Concept Alternative would eliminate the need for some SUMC Project parking because hospital employees would be housed near the SUMC Sites. The savings would be approximately 250 spaces (490 x 64.9 percent x 0.8, where 64.9 percent is the SUMC’s drive alone population, and 0.8 is the weekday factor). Likewise, displacing a portion of the campus population would result in an increase in the need for on-campus parking. The increase would be approximately 230 spaces (420 x 54.4 percent, where 54.4 percent is the University’s drive-alone population).

22.99 The commentor states that the vehicle miles traveled (VMT) associated with the SUMC Project without the traffic demand measures should be 275,566 annually, and would be less than the Village Concept Alternative because the SUMC Project does not include a residential component. The VMT associated with the SUMC Project and the Village Concept Alternative has been revised. Please refer to Staff Initiated Changes 4 and 8 for changes in the VMT analysis for the Village Concept Alternative.

22.100 The commentor states that Table 5-13 and Table 5-15 of the Draft EIR (pages 5-206 and 5-209 respectively) show that with the GO Pass implementation, greenhouse gas emissions of the Village Concept Alternative are reduced by less than 1 percent from the emissions of the SUMC Project. The VMT associated with the Village Concept Alternative has been revised. Please refer to Staff Initiated Changes 4 and 8 for changes in the VMT analysis for the Village Concept Alternative.
22.101 The commentor states that Table 5-16 on page 5-209 incorrectly applies trips by non-employee household members to the proposed SUMC Project. Please refer to Staff Initiated Changes 4 and 8 for changes in the VMT analysis for the Village Concept Alternative.

22.102 The comment reiterates some points made in the Draft EIR. No response is necessary.
Attachment 1

Memorandum

DATE: February 24, 2009
TO: Ms. Cara Silver, Senior Assistant City Attorney
Mr. Rick Jarvis, Jarvis, Fay, Doporto & Gibson, LLP
FROM: Barbara J. Schussman
RE: Prohibition Against Cities and Counties Requiring Employee Trip Reduction Programs.

I. SUMMARY
State law prohibits all public agencies, including cities and counties, from requiring programs for the reduction of employee trips as mitigation without the employer's assent. Because the prohibition arises out of matters of statewide concern, and because the prohibition is reasonably related to its objective and also narrowly tailored, it applies to charter cities.

Accordingly, measures that require the SUMC Project sponsors to reduce employee trips may not be required as mitigation measures in the SUMC Project EIR.

II. ALL PUBLIC AGENCIES ARE PROHIBITED FROM REQUIRING EMPLOYERS TO ADOPT EMPLOYEE TRIP REDUCTION PROGRAMS

In 1995, the State Legislature passed S.B. 437, which severely limited the ability of public agencies to require employee trip reduction programs. Section 40717.9 of the Health and Safety Code provides:

a district, congestion management agency, …, or any other public agency shall not require an employer to implement an employee trip reduction program unless the program is expressly required by federal law and the elimination of the program will result in the imposition
of federal sanctions, including, but not limited to, the loss of federal funds for transportation purposes.

Health and Safety Code § 40717.9 (emphasis supplied).1

Under this statute, the only time that an agency could require trip reduction would be in circumstances when such a program is expressly required by federal law. That exception does not apply.

When S.B. 437 was passed federal law required employee trip reduction programs for some jurisdictions, but the EPA had adopted a policy of non-enforcement of the requirement. See generally Cal. EPA Enrolled Bill Report, Sept. 18, 1995 (recommending the Governor’s signature on S.B. 437). Shortly after the passage of S.B. 437, Congress enacted H.R. 325, which made the implementation of employee trip reduction plans a discretionary component of federal Clean Air Act compliance. See 42 U.S.C. § 7511a(d)(1)(B); H.R. 325, Pub.L.No. 104-70 (Dec. 23 1995). Accordingly, trip reduction programs are not required by federal law.

A. The Term “Employee Trip Reduction Program”

Transportation Demand Management measures that are designed to reduce employee trips fall within the scope of requirements that cannot be imposed on employers pursuant to section 40717.9. The author and original proponent of S.B. 437, Senator John Lewis, stated the following in a letter entered in the Senate Journal on September 15, 1995:

In response to inquiries our office has received, I would like to clarify the intended scope of SB 437. The term “employee trip reduction program” is to be interpreted in its broadest sense to include any mandated measure to reduce employee vehicle trips to the workplace for the purpose of increasing vehicle occupancy, improving air quality, and/or reducing vehicle congestion. This bill would relieve employers from any state or local mandate to prepare a trip reduction program."...
drafted, this measure effectively precludes such powers from being exercised as project mitigation under California Environmental Quality Act or under mechanisms such as developer agreements. The sponsor has indicated that this was not his intent. As such, language in the bill should be modified to reflect the sponsor's intent.

Assembly Floor Analysis of Senate 3d Reading of S.B. No. 437 (Sept. 5, 1995), at 3; see also Assembly Committee on Natural Resource Analysis (July 10, 1995), at 3 (making the same legal observation and the same un-adopted recommendation). An amendment in line with the League of Cities' proposal was proposed by Assembly Member Knox on September 14, 1995, Leg. Hist., part 1 at 17 & 213, but was tabled and was not adopted. In sum, the Legislature's decision to apply the prohibition to cities and counties, including in the CEQA context, was anything but inadvertent.

III. CHARTER CITIES ARE NOT EXEMPT FROM THE PROHIBITION

The prohibition applies to "any" public agency. Health and Safety Code § 40717.9. Nothing in the Health and Safety Code indicates any intent to exempt charter cities. Indeed, the legislative history reveals that several charter cities -- San Francisco, Stockton, and Berkeley -- recognized that they would be subject to the prohibition and publically opposed it. Furthermore, the Legislature clearly intended that all public agencies be subject to the same prohibition. S.B. 437 was amended on May 10, 1995 to exempt the "bay district" (i.e. BAAQMD) from the prohibition, but this amendment was subsequently stricken after Bay Area businesses raised objections to their disparate treatment.

The Legislature's intent to create a uniform prohibition is clear. The question thus becomes whether the prohibition can be applied to charter cities as a matter of California constitutional law notwithstanding the Legislature's intent. See Baron v. City of Los Angeles, 2 Cal.3d 535, 539 (1970) (in a charter city, "ordinances relating to matters which are purely 'municipal affairs' are not invalid because they are in conflict with general state laws or because state laws have been enacted to cover the same subject.").

A. The "Municipal Affairs" Doctrine for Charter Cities

Article XI, Section 5 of the California Constitution provides that charter cities "may make and enforce all ordinances and regulations in respect to municipal affairs, subject only to restrictions and limitations provided in their several

charts and in respect to other matters they shall be subject to general laws." The provision articulates the principle that charter cities are entitled to "home rule"; they have exclusive power over purely "municipal affairs." See generally 8 Witkin, Summary of Cal. Law (10th ed. 2005), Constitutional Law § 993. In other words, charter cities may enact provisions that contradict state law so long as those provisions address purely municipal affairs.

Section 5 enumerates a non-exclusive list of "four 'core' categories that are, by definition 'municipal affairs':" (1) regulation of the police force, (2) "subgovernment in all or part of a city," (3) conduct of city elections, and (4) "the manner in which … municipal officers [are] elected." Cal. Const. art XI, § 5; Johnson v. Bradley, 4 Cal.4th 389, 398 (1992). Beyond these four core categories, it is up to the courts to determine whether an enactment concerns a municipal affair or a matter of "statewide concern.") Johnson, 4 Cal.4th at 399.

It should be noted at the outset that the California Supreme Court has recently (and somewhat colorfully) described the distinction between "municipal affairs" and "statewide concerns" as uncertain and difficult. See Cal. Fed., 54 Cal. 3d 1, 14, 16, 25 (1991) ("Cal. Fed.") (stating that the distinction is "dialectical" rather than "static and compartmentalized"; and that the court has an "ineluctable duty under the 'municipal affairs' clause to allocate political supremacy between the Legislature and the charter cities (without the benefit of guidance from history, constitutional tradition, or sharply delineated principle") (some internal quotation marks omitted).

In place of a clear rule for parsing the jurisdictions of the Legislature and the charter cities, the Supreme Court has outlined a three-step process:

1. First, a court will inquire into whether there is an actual conflict between state law and an enactment of a charter city. Johnson, 4 Cal.4th at 399.
2. Second, a court will evaluate whether there is a matter of statewide concern. Id. at 400.
3. Third, if the subject matter of the state statute involves a matter of statewide concern, the next inquiry is whether the state enactment is "(i) reasonably related to the resolution of that concern, and (ii) 'narrowly tailored' to limit incursion into legitimate municipal interests." Id. at 404.
1. A Municipal Action in Contravention of the Prohibition Creates an Actual Conflict

Although the California Supreme Court has required courts to seriously consider whether there is an actual conflict, and many cases have been resolved with a finding of no actual conflict, the court has never said that this requirement amounts to a canon of interpretation to avoid conflicts where possible; it has certainly not stated that there is a canon of interpretation that would destroy conflicts where they clearly exist. See Sherwin-Williams Co. v. City of Los Angeles, 54 Cal. 3d at 24. The Legislature’s determination that an issue is a matter of statewide concern is entitled to “great weight.” Baggett v. State Department of Health Services, 133 Cal.App.4th 875, 886 (6th Dist. 2005).

Here, there can be no real dispute that a “public agency” that “require[d] an employer to implement an employee trip reduction program” would be acting in conflict with state law. See Health and Safety Code § 40717.9.

2. The Prohibition Addresses Matters of Statewide Concern

A court reviewing the matter would then inquire whether the state law addresses a matter that is “extramunicipal” in nature – meaning not one that is purely a matter of local law and concern. CalFed., 54 Cal. 3d at 17. “[T]he hinge of the decision is the identification of a convincing basis for legislative action originating in extramunicipal concerns, one justifying legislative supersession based on sensible, pragmatic considerations.” Id. at 18. The fact that a matter is, in part, a municipal affair or traditionally one left solely to municipal legislation, does not mean that the state cannot preempt local regulation, even if the local agency is a charter city. CalFed., 54 Cal. 3d at 13.

A court evaluating an alleged incursion into purely municipal affairs will exercise its independent judgment. CalFed., 54 Cal. 3d at 24 n.21. “[T]he fact, standing alone, that the legislature has attempted to deal with a particular subject on a statewide basis is not determinative of the issue as between state and municipal affairs . . .; stated otherwise, the legislature is empowered neither to determine what constitutes a municipal affair nor to change such an affair into a matter of statewide concern.” Johnson, 4 Cal.4th at 405 (internal quotation marks omitted).
There are few who will disagree that employer trip reduction rules are costly, although cost estimates do vary widely. Given the costs of employer trip reduction programs and the negative response from many employees, it is obvious that changes are necessary.

There is no question that the Legislature is entitled to enact provisions to reduce and regulate statewide economic impacts. See Cal. Fed., 54 Cal.3d at 24. It is also self-evident that the potential economic impact of employee trip reduction requirements imposed by a municipality would generally be felt beyond the confines of that municipality. The Legislature’s judgment that a uniform rule is required to eliminate the possibility of unfair regional disadvantages carries with it a judgment that the economic issues raised by a local prohibition cannot be considered purely local concerns. This judgment is entitled to deference. See Cal. Fed., 54 Cal.3d at 24 (“we defer to legislative estimates regarding the significance of a given problem and the responsive measures that should be taken towards its resolution”).

At core, the rationale behind S.B. 437 is an economic judgment that trip reduction programs are inefficient. That said, the statewide interest is not simply a generic need for deregulation, but rather a need for effective regulation to reduce air pollution. The matter of statewide concern addressed by the provision thus is, in general terms, the transportation policy tools available to public agencies in addressing air pollution.

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1 S.B. 437 also enacted Health and Safety Code section 40717.9(b), which states “Nothing in this section shall preclude a public agency from regulating indirect sources in any manner that is not specifically prohibited by this section, where otherwise authorized by law.”

2 The prohibition is set out in Division 26 of the Health and Safety Code addressing air resources. Specifically, the provision is found in Division 26, Part 3, Chapter 6 of the Health and Safety Code, outlining the “general powers and duties” of air control districts.
3. The Enactment is Reasonably Related to Resolution of the Statewide Concern and Narrowly Tailored to Address that Concern

With respect to the reasonable relationship test, a court would not find that the Legislature’s prohibition on imposing trip reduction measures is unrelated to its objective of eliminating costly burdens on business. In determining whether a matter is one of statewide concern as opposed to a municipal affair, the courts do not entertain arguments as to whether the statewide legislation is prudent public policy, advisable or effective. Cal Fed., 54 Cal. 3d at 23.

With respect to tailoring, courts have deferred to the Legislature’s judgment as to the scope of the measure required to accomplish the Legislature’s objective. See Cobb v. O’Connell, 134 Cal.App.4th 91, 98 (1st Dist. 2005) (review denied Feb. 1, 2006) (state’s emergency take-over of school district for two years was narrowly tailored; court is “unable to second-guess the Legislature’s judgment” with respect to proposed alternative measures that would allegedly be effective and less intrusive). Further, “in articulating the [tailoring] test for preemption the Supreme Court was concerned with ensuring that a state law does not infringe legitimate municipal interests other than that which the state law purports to regulate as a statewide interest.” City of Watsonville v. State Department of Health Services, 133 Cal.App.4th 875, 889 (6th Dist. 2005) (modification and emphasis supplied). For example, an argument that S.B. 437 is overbroad in terms of precluding the mitigation of traffic and air impacts would likely be categorically irrelevant insofar as these matters are also matters of statewide concern. See id.

In the final analysis, where a particular type of regulatory burden is deemed an inefficient economic burden on the state’s businesses, eliminating that burden is a “narrowly tailored” remedy.

IV. TREATMENT OF TRANSPORTATION DEMAND MANAGEMENT MEASURES IN PRIOR STANFORD ENVIRONMENTAL IMPACT REPORTS IN PALO ALTO

The analysis presented above demonstrates that Palo Alto cannot require trip reduction as mitigation. For this reason, the City historically has recognized that the Legislature’s prohibition on imposition of traffic reduction measures on employers applies to Palo Alto. The 2000 DEIR for the SUMC Center for Cancer Treatment and Prevention states:

Transportation demand management refers to actions that reduce work-related, drive-alone vehicle trips. Although a state law was passed in 1993 that prohibited agencies and cities from requiring mandatory TDM, the City of Palo Alto and Stanford University still voluntarily provide TDM programs for their employees. DEIR 3.5-9.
22a. Stanford University Medical Center, Barbara Schussman (letter dated February 24, 2009)

22a.1 The commentor disagrees with the statement on page 3.4-27 of the Draft EIR that the City can effectively require the applicant to include TDM measures in the SUMC Project. Please see Response 22.8.
Attachment 2

MANDATORY REMOTE SUMC EMPLOYEE PARKING

Stanford University and the Hospitals currently participate in voluntary remote employee parking through the Stanford/AC Transit U-Line. This service is provided as one of the choices employees have within the Parking and Transportation Services (P&TS) transportation demand management program.

The implementation of a mandatory remote parking program for a portion of the Hospitals employees raises several critical issues related to employee recruitment/retention, operation of the remote lots, feasibility, and environmental sustainability. These are discussed below:

• **Competitive Workforce Environment** - Mandatory remote parking (located several miles from the facility) is not used at the other hospitals located on the peninsula and in the south bay region. In the highly competitive healthcare employment environment, mandatory remote parking would create serious recruitment and retention challenges. Many employees correctly perceive remote parking as inconvenient because it increases commute time for employees who drive to work. Employees also could have concerns about their personal safety and the safety of their vehicles.

• **Employee Personal & Vehicle Safety** - Safety of employees, as well as the security of unattended vehicles in remote and distant parking lots are critical concerns. The Hospitals would need to provide security measures at a remote lot if employees were not parking there voluntarily. The cost to provide personal and vehicle security at the locations identified by the City would be high. Some of the locations are not in heavily traveled areas, so there would be no one to see or report suspicious behavior or actual crime, especially if lots have been sited to reduce visual impacts.

• **Designation of parking as Stanford parking** - Any parking provided as mandatory parking would need to be available for SUMC hospital employees. Therefore, other parkers would need to be excluded from the lots, which would require development of separate facilities that could be gated. This would be particularly true for any lots that were developed adjacent to other park-and-ride lots.

• **Employee Assignment** - Maintaining equitable and fair employment practices would be problematic when requiring and assigning remote parking for one group of employees and allowing others to park at, or closer to, the Medical Center. Even under the current parking situation, parking accessibility and cost have been major negotiating points with the unions that represent hospital employees. Mandatory remote parking would make union negotiation much more contentious.

• **Capital & Operation Costs** - Costs associated with construction and operation of the remote lots would be substantial. Capital costs include acquisition of the property (purchase or lease), design and permitting of the lots, construction (and demolition) costs, and purchase of additional shuttle buses. The closer remote lots would require one bus each to provide approximately 30-minute headways, or two buses each for 15-minute headways. Shuttle bus requirements would double for a farther distance.
DISCUSSION OF CITY’S PROPOSED REMOTE PARKING LOCATIONS

Ardwenwood Farms (for employees approaching from East Bay via Dumbarton Bridge)

Distance from SUMC: Approximately 10.5 miles

The existing park-and-ride lot at Ardenwood Farms was recently expanded to 350 parking spaces. This lot is used by visitors to the Ardenwood Farms as well as Transbay transit riders during the weekdays. The Stanford/AC Transit U Line is currently served by this park and ride lot and Stanford currently spends about $140,000 per year to subsidize the route.

SUMC does not have specific traffic data on the operation of the SR84/Ardenwood Boulevard interchange or the signalized intersection that provides access to Ardenwood Farms.

Stanford and the Hospitals do not own or control land at this location.

Page Mill/I-280 Interchange (for employees approaching on I-280 from the South)

Distance from SUMC: Approximately 4.5 miles

The City’s proposal is to increase the size of the existing Caltrans rideshare parking lot at the corner on Page Mill Road and Arastradero Road. The existing lot accommodates approximately 50 vehicles. Under the City’s initial draft mitigation plan for the SUMC Project, over 200 spaces would be located in the I-280 corridor. It is not known how many of these 200+ spaces would be in the Page Mill area. It is fair to assume that the existing capacity of this lot would need to at least double.

Increasing the capacity of this site would add traffic at the Southbound I-280 off-ramp intersection. This stop sign controlled intersection is currently experiencing poor operation during the AM peak period due to the high volume of southbound off-ramp traffic (>2,000 vehicles in the peak hour). Also, the southbound off-ramp traffic, which must pass through this intersection, backs up onto I-280 during the morning peak period. Trips destined to the City’s proposed remote parking area would conflict with, and add to, this off-ramp traffic and exacerbate the existing operational problems. Shuttle buses would also have to pass through the intersection to carry SUMC employees to the Medical Center.

The existing parking area is adjacent to several large, single-family homes. There appears to be an area that is within the Caltrans right-of-way to the east of the existing parking area. However, this area is sloped and would require extensive grading to be used as parking. This vacant area also backs up to more large homes. It is anticipated that any expansion of this lot would be controversial with adjacent residential neighbors.

This site would be partially visible from I-280, which is a State Scenic Corridor.

Stanford and the Hospitals do not own or control land at this site.

Remote Parking Promotes Use of Personal Vehicles - Use of mandatory remote parking is based on commuters driving personal vehicles for much of their commute, rather than using alternative transportation modes. The Hospitals believe that expenditures related to traffic reduction should be focused on reducing the number of single-occupancy vehicle trips, rather than redistributing trips made by solo drivers.

Further, in order to compensate for the increased travel times experienced by employees, it is likely that parking permits for remote lots would have to be low- or no-cost permits, as compared to the current permit pricing at SUMC. This is in direct conflict with the Stanford and SUMC practice of providing incentives not to drive cars at all, rather than to drive most of the distance and then park off site.

Carbon Footprint – The type of remote parking program proposed by the City is not effective in minimizing criteria pollutants and greenhouse gas emissions. Employees drive their single occupant vehicles to and from remote lots. Shuttles between the lots and the SUMC would have to operate throughout the day, making two-way trips each time whether empty or full. While there might be some small overall emissions reduction from shuttling employees for a part of their commute, a much larger emissions reduction can be achieved by taking employees out of their cars altogether.

Spillover Effect in adjacent neighborhoods - While the City’s suggested mandatory remote parking program could prevent an employee from acquiring a SUMC parking permit on-site and “require” employees to use certain remote parking lots, the reality is that people will seek more convenient parking solutions. It is highly likely that employees would park on public streets in nearby neighborhoods, for example, Downtown North or Allied Arts, rather than park in their assigned remote lot. This spillover effect would likely result in the neighborhood demand for residential parking permit programs in areas adjacent to SUMC. Based on recent experience with College Terrace, nearby neighbors would strongly oppose a City imposed condition that knowingly “underparks” the SUMC campus and creates local spillover impacts.
SLAC – I-280/Sand Hill Road Interchange (for employees approaching from north on I-280)

Distance from SUMC: Approximately 3.25 miles

Two locations have been suggested by the City for a “SLAC” remote lot which would be located near the I-280/Sand Hill Road interchange: One location is along and accessed from Lawler Ranch Road and the other location is on the former Christmas Tree Farm site along Sand Hill Road, west of I-280.

Construction and operation of remote lots on either of these sites would require approvals from San Mateo County.

From a practical standpoint, the use of these sites for remote lots would be opposed by environmental organizations and/or local residents on a variety of issues related to potential traffic, visual and environmental impacts. Phillips Brooks’ proposal for a school site at the end of Lawler Ranch Road was stymied and eventually withdrawn due, in part, to traffic and visual concerns. Stanford’s recent proposal at the former Christmas Tree Farm area to dispose dirt on the site temporarily and then restore the area to a condition better than exists today was withdrawn due to neighborhood and environmental group opposition based on traffic and visual effects. These two sites could be visible from I-280, which is a State Scenic Corridor, depending where the site were located.

Stanford may or may not own the site along Lawler Ranch Road, depending on the specific location. The Hospitals do not own or control land at either location.

Embarcadero Road (for employees approaching from south on US 101)

Distance from SUMC: Approximately 4.0 miles

The City’s proposed site on Embarcadero Road is an existing office complex which is currently vacant. It is assumed that the building would have to be razed and the entire parcel would be used for parking. If we have the correct building, the site is approximately 200 feet by 200 feet (40,000 sq. ft.), which would support a surface parking lot of approximately 120-130 parking spaces.

This site would add traffic to the intersection of Embarcadero Road and Bayshore Road. This intersection already operates very poorly due to the traffic volumes and roadway geometry. If the site were converted from an office use to a remote lot, it would likely generate more peak hour trips. Therefore, there would be a potential secondary impact at the intersection of Embarcadero Road and Bayshore Road during the peak hours.

Stanford and the Hospitals do not own or control this site.

Stanford in Redwood City (for employees approaching from north on US 101)

Distance from SUMC: Approximately 4.5 miles

The City’s proposal would be to add parking to the Stanford in Redwood City project and operate shuttles between the site and the SUMC campus in Palo Alto. It should be noted that any additional parking added to the Stanford in Redwood City project would be structured parking because there isn’t land available for additional surface parking. This addition of parking to the site would require approvals by the City of Redwood City.

From a traffic perspective, this remote lot would place more vehicle traffic on Woodside Road and at the Woodside Road/US 101 interchange. This corridor and interchange have been a problem for the City of Redwood City and Caltrans for over two decades. The operation of the intersections within, and adjacent to, the US 101/Woodside Road interchange area currently operate at Level of Service E or F during the AM and PM peak periods. Substantial study has gone into finding solutions to the corridor’s operational problems, but they are yet to be resolved. Creating a remote lot at the Stanford in Redwood City site would add significantly to these affected intersections in Redwood City. It is highly unlikely that Redwood City would approve such a use.

Remote parking at this location also would be very inconvenient for employees destined for Palo Alto due to distance between the site and the freeway, and impeded access due to the already congested intersections and interchange. In addition, shuttle service between Redwood City and Palo Alto would be relatively slow because shuttles would most likely not utilize US 101 due to distance, congestion, and increased insurance costs to run shuttles on freeways. Instead, shuttles would likely use El Camino Real where there are numerous traffic signals and congested intersections. Menlo Park has already expressed concern about Stanford traffic between Palo Alto and Redwood City – it is anticipated they would also have concerns about additional shuttle trips due to this remote lot.
Figure 1 – Remote Parking Locations Proposed by City of Palo Alto

Figure 2 – Sand Hill Road / I-280 Locations
Figure 3 – Page Mill Road / I-280 Location

Figure 4 – Embarcadero Road Location (across from Palo Alto Golf Course / Airport)
Figure 5 – Ardenwood Parking (Existing Park and Ride Lot)

Figure 6 – Redwood City Mid-Point Technology Center Location
22b. Stanford University Medical Center, Michael J. Peterson (letter dated July 27, 2010)

22b.1 The commentor points out the disadvantages of implementing a mandatory remote parking program. Please refer to Master Response 2 for a discussion on remote parking.

22b.2 The commentor provides background information on the Ardenwood park-and-ride lot. The information provided by the commentor is correct. If remote parking were implemented using the Ardenwood park-and-ride lot, the SUMC Project sponsors would need to lease the appropriate number of spaces from AC Transit, the operator of the park-and-ride lot. In addition, additional environmental review would be required if the lot were expanded beyond its current size. Please refer to Master Response 2 for more discussion on remote parking.

22b.3 The commentor provides background information on the parking lot at Page Mill Road/I-280 interchange. Please refer to Master Response 2 for a discussion of remote parking.

22b.4 The commentor provides background information on the parking lot at I-280/Sand Hill Road interchange. Please refer to Master Response 2 for a discussion of remote parking.

22b.5 The commentor provides background information on the parking lot along Embarcadero Road. Please refer to Master Response 2 for a discussion of remote parking.

22b.6 The commentor provides background information on the parking lot in Redwood City. Please refer to Master Response 2 for a discussion of remote parking.
Stanford Hospital Transit Center Data Request (request shown in red)

City comments provided on December 2, 2009 are addressed at end of document (City comments in blue). Responses to the original Data Request have been modified slightly to address City comments.

The following information is needed to prepare a conceptual design of a transit center at Stanford Hospital.

The Marguerite is a well-established bus/shuttle transit system at the University and SUMC, and the information below describes some of the key operational features of the system pertaining to bus stops, including "enhanced" bus stops that are proposed at selected locations within the SUMC area. These enhanced bus stops are locations where we anticipate a high-volume of employee and/or patient ridership during peak times. At these enhanced locations we will provide shelters, benches, and other amenities to encourage transit use and improve the experience for passengers when waiting for the Marguerite.

We note that these enhanced bus stops do not function like traditional transit centers such as the Palo Alto Transit Center. Features of a traditional transit center commonly include the following characteristics:

- Multiple service providers and/or modes of transit
- "Cross-platform" transfers between different providers and modes
- Need for vehicles to layover to accommodate transfers or schedule
- Amenities (restrooms, vending machines, etc.) for passengers who are waiting long periods or related to the operation of the transit vehicles

With the exception of the bus stops located in front of Hoover Pavilion, the bus stops within the SUMC area are only used by vehicles operated by or for Stanford, including the Marguerite and the Line U (which is an AC Transit express bus partially subsidized by Stanford, with service from the East Bay and limited stops at the University and SUMC). Therefore, Stanford directly controls how these vehicles use the bus stops. Since most of the trips are commuter work trips, with SUMC as the destination, there are few transfers that occur at these bus stops. That, combined with the high frequency of service, minimizes the number of passengers queued at any stop. Stanford regularly monitors boarding patterns and will continue to add shuttle service at locations where demand exceeds capacity.

Figure 1 shows the location of the anticipated future Marguerite routes and stops (for A-line, B-line, and MC (Medical Center loop) routes) within the SUMC. These routes are essentially the same as the existing Marguerite routes, with slight modifications to adjust for the proposed project. Figure 1 includes stops in the SUMC that are shared with the Line U. It should also be noted that the route and bus stop locations would be the same under the Tree Preservation Alternative.

January 9, 2010
The criteria for locating Marguerite shuttle stops are as follows:

- Avoid locating bus stops closer than intervals of ¼ mile.
- Where possible, locate stops on the far side of intersections to minimize conflicts with off-loading pedestrians.

Currently, the Line U and the Marguerite system share stops at numerous locations at Stanford. Each shared stop has both Marguerite and AC Transit Line U signs to inform riders of the service at these stops (a standard practice with transit agencies that share stops). With this arrangement, there is no need to have separate stops for each service provider.

2) Alternative Sites. Where in Stanford’s opinion are two or three locations for the transit center?

Response: Figure 1 shows the locations of the proposed enhanced bus stops in the SUMC area at Hoover Pavilion, Quarry Road, and Pasteur Drive. These locations were selected as the optimal loading locations for SUMC employees. However, the enhanced bus stops would also be used by patients and visitors, and signage will be provided to direct such riders to the front doors of the hospitals and Hoover facilities.

3) Base Aerial. Is aerial photography available that is better than Google?

Response: Yes, provided in original transmittal on November 11, 2009.

4) Amenities. What amenities should be included, both for the public (benches, bus schedule information, shelters, etc) and for operators (restrooms, layover facilities)?

Response: Enhanced bus stops will provide riders with shelter, seating, lighting, signage, maps, bus lines served, bus schedule, and bike parking as necessary. No other passenger facilities are needed due to the high frequency of Marguerite service.

Marguerite operators do not take breaks in the middle of the route so no services will be provided in the SUMC. Services for operators (e.g., restroom, break room) are available at the ends of the routes at the Palo Alto Transit Center and Stanford’s Parking Structure 5 on Oak Road.

5) Ridership. Estimates of ridership demand to size the waiting areas.

Response: Ridership is not used to size the waiting areas. The Marguerite system is planned with a physical capacity of up to 100 feet of curb to accommodate up to one full-size bus and a smaller bus at the same time. Then, as the sole operator of these routes, Stanford adjusts for additional demand by adding buses to decrease the headways and
increase capacity. The schedule prevents the potential conflict of more than two buses at a stop at a given time.

Comment: The Menlo Park midday shuttle also serves the hospital and Blake Wilbur Clinic. It has a 7 minute layover. http://www.menlopark.org/departments/trn/shuttle.pdf

The Menlo Park Midday Shuttle route is depicted in Figure 2. The hospitals have not approved the use of a layover at Blake Wilbur Clinic and will require that the shuttle operator modify the layover as needed to ensure it does not delay other shuttle services or result in congestion.

Are there other non-Stanford shuttles that would need to be accommodated at the enhanced bus stops? Do buses/shuttles from senior housing facilities in the area use the current bus stop with or without layovers?

The revised Figure 2 provides information on other transit services in the area. The enhanced stop at Stanford Shopping Center along Quarry Road is the only enhanced bus stop that would need to accommodate non-Stanford services (i.e., SamTrans and VTA).

Nearby senior facilities (Classic Residence by Hyatt, The Sequoias – Portola Valley, Channing House) provide resident shuttle service to and from the medical center. Residents are dropped off for their appointments and later call when they are ready to be picked up. Drop-offs are at front doors, rather than at shuttle stops (which are not designed to provide front door services). There is no layover requirement.

It would be helpful if there are projected numbers of shuttle users, and the peak demand for U-line transit to the hospital.

The Line U, operated by AC Transit, provides transit service between Stanford and the East Bay. If AC Transit cannot accommodate all of the future demand for this connection to the East Bay (anticipated to be an additional 15 to 20 riders), the demand can be accommodated by the Dunnorton Express, which provides many more trip options than the Line U and connects with the Marguerite shuttle at the Palo Alto Intermodal Transit Station. See trip/connection summary at http://transportation.stanford.edu/images/EastBay-Stanford_transit_guide.pdf.

Table 1 presents the estimated Marguerite riders in the peak hour resulting from increased uses of Caltrain and other transit. This future train and other transit ridership would be 380 peak hour riders if the Go Pass triples the existing Caltrain ridership and 588 peak hour riders if the Go Pass achieves the University level of Caltrain ridership. Stanford’s June 2009 proposal letter to the City offered to provide the GO Pass to SHC and LPCH existing and future employees and to fund the additional Marguerite shuttles necessary to serve the future increase in Caltrain riders resulting from institution of the GO Pass. Stanford University’s Director of Parking & Transportation Services has been actively involved with the planning surrounding the supply of additional Marguerite shuttles and is confident that the additional riders can be served through provision of these additional shuttles.

In addition, Table 1 indicates that there would be approximately 264 employees in the peak hour that would park at the Hoover Pavilion. Some of these employees would walk to the Main Medical Center and the others would require a Marguerite shuttle. This additional demand could be served through capacity on the Marguerite A and B lines or through dedicated shuttles and from the parking structure and the SUMC (as occurs today on the MC line to and from Parking Structure 5).

While confident of its ability to provide bus stops that can accommodate the additional Marguerite shuttles on its property, Stanford recognizes that there will likely be a need for staging additional buses in the vicinity of the existing Transit Center. Stanford and the City will work cooperatively with VTA and others to provide staging solutions.

Comment: Please provide information on which Marguerite shuttles will use each stop. Do the routes change with the construction of the new hospital buildings? Bill Phillips should recall what we did for the SHR projects. Something similar would be helpful in reviewing this transit stop proposal.

Figure 1 has been revised to indicate which Marguerite routes utilize each stop. The routes will not change as a result of the project. Routes will need to be maintained during construction to provide access to the existing SUMC buildings. At this time, before a construction manager has been hired, it has not been determined whether access on Welch Road would be constrained for transit vehicles during the Welch Road construction activities that will occur early in the project. If Welch Road construction requires temporary blockage, alternative transit routes would be established using Sand Hill Road and/or Quarry Road (east of the SUMC). Route determination would likely involve an assessment of traffic volumes and route schedule impacts related to these alternative routes.

Prior to commencement of any construction phase which impacts transit access or movement, a Construction Traffic Management Plan will be provided to the City of Palo Alto for review and approval.

Comment: Will this [100-foot length] suffice for the peak periods of bus activity?

Yes. As mentioned above, based on Stanford’s experience operating the bus/shuttle service, the 100-foot length is sufficient to support two buses at the same time. Stanford manages the system to address higher demand with reduced headways and more frequent buses, rather than running additional buses at the same time.

Comment: There are bike lanes along Pasteur. It would be best to have a duck out at this enhanced bus stop. The design used for the bus stops (without layover around the shopping center (on Quarry and Sand Hill) or with layover stops (on Arboretum) could be considered.
The guidelines for the use of duck-outs are provided above in Response #1. The existing duck-outs located in SUMC along Quarry Road are identified in Figure 1.

The proposed project removes curb-side parking along Pasteur Drive, creating enough width for two lanes of traffic and a bike lane. Following the guidelines above, the SUMC Project sponsors do not plan to provide a duck-out at the enhanced bus stop along Pasteur Drive.

The enhanced bus stop on Quarry west of Welch should also have duck outs similar to those provided on Quarry by the shopping center.

Following its guidelines, the SUMC Project sponsors do not plan to provide a duck-out at the enhanced bus stop on Quarry south of Welch Road because there are two lanes of traffic and a bike lane at this location.

Comment: Why is the main stop for the LPCH on Quarry and not on Welch? I do not see a bus stop on Welch for LPCH. The distance between the Psych Clinic shuttle stop and first shuttle stop on Welch is quite long.

As mentioned in Response #2 above, Marguerite stops are located optimally for the employees, who are the primary commuters. The enhanced bus stop for LPCH is located on Quarry rather than Welch because a LPCH staff entrance will be located along Quarry (as it is today). Visitors and patients coming to LPCH can also utilize this stop, which connects to a short path through the garden to the front public entrance.

The area in front of LPCH and 730 Welch is very busy with automobiles, bicycles, and the pedestrian crossings. The SUMC Project sponsors do not have the room to create a bus duck-out on the LPCH side of Welch Road due to the parking structure and entry areas.

It should be noted that, following the guidelines described above in Response #1, duck-outs will be added to the existing Welch Road bus stops at approximately 1101 Welch Road and 801 Welch Road (see Figure 1).
### Table 1. Estimated additional Marguerite ridership with Go-Pass participation levels

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<th>Existing Ridership</th>
<th>Future Ridership</th>
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<tr>
<td></td>
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<td>Existing Level</td>
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<tr>
<td>Caltrain (1)</td>
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<td>Bus</td>
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<tr>
<td>Marguerite (no transfers)</td>
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<tr>
<td>Total Ridership</td>
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<td>Weekday Trips (2)</td>
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<tr>
<td>Peak Period Trips</td>
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<tr>
<td>Peak Hour Trips</td>
<td>55%</td>
<td>55%</td>
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</tbody>
</table>

**Notes:**
- (1) Current Caltrain shuttle ridership is calculated as the absolute increase in ridership due to the increase number of employees plus implementation of the Go-Pass.
- (2) Weekday, Peak Period and Peak Hour Factors taken from Go pass memo.

**Other Transit Routes & Stops at SIUC:**

- Pain Alto Boundary
- Markle Park Midway Shuttle Shop
- Midway Park Midway Shuttle Shop (existing)
- Caltrain, inbound 280 & 281
- Caltrain, outbound 280 & 281
- 39th Ave., Mail Truck 23

**Figure 2.**
22c. Stanford University Medical Center (letter dated January 9, 2010)

22c.1 The commentor provides information to prepare a conceptual design of enhanced bus stops at Stanford Hospital and at the Hoover Pavilion. Please refer to Staff-Initiated Change 1 for more discussion of provision of on-site enhanced bus stops.
Attachment 4

Memorandum

DATE: July 27, 2010

TO: City of Palo Alto
FROM: Barbara Schussman
RE: Greenhouse Gas Evaluation Methodology

The SUMC DEIR uses a significance threshold for greenhouse gas emissions that is tied to "business as usual" projections. Specifically, the DEIR evaluates whether project emissions would "reach a 30 percent reduction of 2020 BAU emissions." To properly apply this threshold it is important to understand how the 30 percent figure is derived.

AB 32 requires the State to reduce greenhouse gas emissions to 1990 levels by 2020. To implement AB 32, the California Air Resources Board set a numeric emissions target equal to greenhouse gas emissions in 1990. CARB also calculated the future emissions in 2020 assuming anticipated population and economic growth occurred and no regulatory changes were implemented. This projected future level of emissions in 2020 is called the "business-as-usual" scenario. CARB's AB 32 Scoping Plan states that "[r]educing greenhouse gas emissions to 1990 levels means cutting approximately 30 percent from business-as-usual emission levels projected for 2020, or about 15 percent from today's [2008] levels."

Note that if the 30 percent significance threshold were divorced from CARB's concept of "business as usual," then it would be arbitrary. As regulatory changes are made and implemented, the reduction in anticipated future emissions is expected to decrease over time.

2 AB 32 requires CARB to "determine what the statewide greenhouse gas emissions level was in 1990, and approve in a public hearing, a statewide greenhouse gas emissions limit that is equivalent to that level, to be achieved by 2020." Health & Safety Code § 38550.
Moreover, Title 24 energy efficiency requirements do not apply to hospitals. OSHPD does not require compliance with the California Energy Code (which is codified at Title 24, Part 6, of the California Code of Regulations). Because hospitals are not subject to the energy efficiency requirements of Title 24, it would be inappropriate to treat Title 24 energy efficiency requirements as part of business-as-usual for hospital buildings.

The SUMC DEIR quantifies energy consumption rates for the new Hospital buildings (without the proposed energy conservation measures) based on the information provided by Mazzetti & Associates in the Project Application. The DEIR treats those calculations as its business-as-usual scenario. The calculations provided by Mazzetti & Associates do not apply Title 24 energy efficiency standards to hospital buildings. Thus, the DEIR appropriately calculates business-as-usual energy consumption rates for the proposed hospital buildings.

However, in the text, the SUMC EIR states that current Title 24 energy efficiency standards are treated as part of the business-as-usual for calculating energy consumption for hospital buildings. (DEIR p. 3.6-52) This statement should be corrected in the FEIR.

Future Energy Consumption For Hospital Buildings Should Be 30 percent Lower Than Business-as-Usual

The SUMC EIR assumes that, due to the energy efficiency measures included in the SUMC Project, electrical energy consumption at the new hospital buildings would be 20 percent lower than business-as-usual emissions. It appears that the 20 percent estimate is based upon the incorrect assumption that Title 24 standards already are included in the business-as-usual projections. The project description states that new hospital buildings would be designed to use 20 percent less energy than buildings designed to meet ASHRAE 90.1 standards. The reduction from business-as-usual should be linked to the project design goal that the hospital buildings would use 35 percent less energy than typical hospitals. To be conservative, in the technical report dated December 9, 2008, Mazzetti & Associates estimated that greenhouse gas emissions associated with energy consumption at the hospital buildings would be reduced by 30 percent compared to estimates that did not take into account the energy conservation features.

In addition, the SUMC EIR should reduce emissions associated with production of steam and chilled water at the Central Energy Facility due to the SUMC Project’s energy efficiency measures in both the hospital and School of Medicine buildings. The SUMC EIR does not explain why emissions associated with production of steam and chilled water were not reduced as a result of the energy conservation features included in the project description for the hospitals. The hospitals will use chilled water for its cooling system and steam (or hot water) for heating and sterilization. The hospitals’ energy efficiency features will reduce the consumption rates for the new hospital buildings (without the proposed energy conservation measures) based on the information provided by Mazzetti & Associates in the Project Application. The DEIR treats those calculations as its business-as-usual scenario. The calculations provided by Mazzetti & Associates do not apply Title 24 energy efficiency standards to hospital buildings. Thus, the DEIR appropriately calculates business-as-usual energy consumption rates for the proposed hospital buildings.

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In addition, the SUMC EIR should reduce emissions associated with production of steam and chilled water at the Central Energy Facility due to the SUMC Project’s energy efficiency measures in both the hospital and School of Medicine buildings. The SUMC EIR does not explain why emissions associated with production of steam and chilled water were not reduced as a result of the energy conservation features included in the project description for the hospitals. The hospitals will use chilled water for its cooling system and steam (or hot water) for heating and sterilization. The hospitals’ energy efficiency features will reduce the
need for steam and chilled water. With regard to the School of Medicine buildings, the SUMC EIR states that natural gas consumed within the SoM buildings is from consumption by the boilers/steam plant and would not be affected by the energy efficiency of the building. (DEIR p. 3.6-52) This statement seems to confuse emissions from the offsite Central Energy Facility, which are tied to steam and chilled water production, with use of natural gas inside the SUMC project buildings. Consumption of steam and chilled water from the Central Energy Facility would be reduced due to energy efficiency measures. Natural gas used inside the buildings is not linked to the Central Energy Facility or its emissions. Accordingly, the Final EIR should show that, with the SUMC Project’s conservation features, project emissions associated with production of steam and chilled water would be reduced by 30 percent.

II. Vehicular Emissions

State Regulatory Initiatives Under the Scoping Plan are Not Part of Business As Usual

The SUMC EIR states that it uses URBEMIS 2007 for its estimates of emissions from non-fleet vehicles (cars and light trucks transporting employees, patients and visitors). (DEIR p. 3.6-30) We understand that the emissions assumptions in URBEMIS 2007 are consistent with the assumptions CARB used in estimating BAU emissions from cars and light trucks. Therefore, the DEIR methodology for calculating BAU emissions associated with non-fleet vehicles is appropriate.

Adopted State Laws Should Be Incorporated Into The Calculation of 2020 Project Emissions

Non-BAU projections should take into account state-level actions to reduce greenhouse gas emissions that have been adopted since 2002-2004. In its recent technical guidance on calculating project-level GHG emissions, the Bay Area Air Quality Management District notes that: “Several measures included in the AB 32 Scoping Plan will impact local GHG emissions and may be taken into account in the GHG emission projection. Of particular importance are the Renewable Portfolio Standard and the Pavley I and II regulations.”

Accordingly, the FEIR should be revised to account for emissions reductions associated with Pavley and the Low Carbon Fuel Standard in calculating non-BAU vehicular emissions.

Inclusion of Patient/Visitors Trips in GHG Calculations

The DEIR separately quantifies Vehicle Miles Traveled for employee trips and for trips by patients and visitors. We ask that the City and its consultants consider whether it is appropriate to attribute greenhouse gases from patient and visitor trips to the proposed project for purposes of performing a BAU comparison. As the DEIR recognizes, a substantial portion of emissions from patient and visitor trips could occur whether or not the SUMC Project is approved. “This is because people are likely to seek the type of medical services provided by the SHC and LPCH whether those services are offered at SHC or LPCH or at some other hospital.” (DEIR p. 3.6-29) While we agree that it was appropriate to include such trips in the overall GHG inventory, it is not clear to us that it is appropriate to include them when performing a BAU comparison. At a minimum, we suggest that the FEIR separately present emissions associated with employee trips, and indicate that the Go Pass would reduce employee VMT (and associated greenhouse gas emissions) by 44.5 percent.

Stanford University Medical Center, Barbara Schussman (letter dated July 27, 2010)

The commentor states that the California Air Resources Board’s (CARB) adopted Scoping Plan anticipates that in order to reduce emissions by 30 percent compared to business-as-usual (BAU) emissions in 2020, much of the reductions will come from Statewide regulations. Accordingly, when using a BAU methodology, the effect of Statewide regulations adopted since 2003 should be included in the calculations of non-BAU emissions, but not BAU emissions. The calculation of non-BAU emissions of the SUMC Project has been revised to include the State-adopted regulations when estimating project-specific emissions. Revisions to the greenhouse gas inventory based on Statewide standards are discussed in detail in the Staff-Initiated Change 4 (State Adopted AB 32 Scoping Plan Measures).

The commentor states that the Draft EIR incorrectly adds current Title 24 efficiency standards to the assumptions for BAU emissions quantifications on page 3.6-52; however the emissions are accurately calculated without the incorporation of the current Title 24 efficiency standards. In order to address this comment, the second sentence of the first paragraph on page 3.6-52 of the Draft EIR has been revised to clearly define the assumptions used in the BAU calculations with respect to energy efficiency, as shown in Staff-Initiated Change 4.

The commentor states that the future energy consumption for the SUMC Project hospital buildings should be 30 percent lower than BAU and that the production of steam and chilled water from the Central Energy Facility should also be reduced due to the increased energy efficiency of the hospital buildings. The calculations of greenhouse gas emissions from future energy consumption of the hospital buildings and the reduction of steam and chilled water from the Central Energy Facility have been revised to more accurately portray the energy efficiencies of the SUMC Project. The revisions to the greenhouse gas inventory based on changes to the energy efficiencies from those presented in the Draft EIR are discussed in detail in the Staff-Initiated Change 4.

The commentor agrees that the methodology for the BAU emissions associated with non-fleet vehicle emissions is appropriate. However, the commentor states that the adopted State laws should be incorporated into the calculation of 2020 SUMC Project emissions. The adopted State laws, such as Paveley and the Low Carbon Fuel Standard are now incorporated into the non-BAU vehicular emissions. This assumption, and the resulting revisions to the Draft EIR, is discussed in detail in the Staff-Initiated Change 4.

The commentor asks that the City consider whether it is appropriate to attribute greenhouse gases from patient and visitor trips to the SUMC Project for purposes of performing a BAU
comparison. See Staff-Initiated Change 4 (Patient and Visitor Trips) for a full discussion of patient and visitor trips with respect to the revised greenhouse gas analysis.
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**SUBTOTAL** | 50 | 31 | 19 | 8 |
TRMP shall be inclusive of the following minimum information: appropriate irrigation, monitoring inspections, post relocation tree maintenance, and for an annual arborist report of the condition of the relocated trees. If a tree is dispersed, learning with supports needed, in decline with a dead top or dbh of more than 25 percent, the tree shall be considered a total loss and replaced as described above.

22e.3

22e.4

Suggested Revisions to Tree Mitigation Measures

22e.1

An updated tree survey and tree preservation report (TPR) prepared by a certified arborist shall be submitted for review and approved by the Director of Planning and Community Environment in consultation with the City Urban Forester. If reference data, the tree survey shall include (list and field tags) all existing trees within the SUMC Sites, including adjacent trees occupying the SUMC Sites. The approved TPR shall be implemented in full, including mandatory inspections and monthly reporting to City Urban Forester. The TPR shall be based on latest SUMC plans and amended as needed to address activity within the dripline area of any existing existing protected tree to be preserved, including incidental work (utilities trenching, street work, lighting installation, etc.) that may affect the health of a preserved protected tree. The TPR shall be consistent with the criteria set forth in the Tree Preservation Ordinance, Palo Alto Municipal Code Section 8.10.30, and the City Tree Technical Manual, Section 3.00. 5.00 and 6.30. To avoid improvements that may be detrimental to the health of protected trees, the Director of Planning and Community Environment in consultation with the City Urban Forester, shall review the SUMC Project sponsor’s landscape plan to ensure the new landscape is consistent with Technical Tree Manual, Section 5.45 and Appendix L, Vegetative Under New Oaks.

22e.2

The TPR shall be implemented in full, including mandatory inspections and monthly reporting to City Urban Forester. The TPR shall be based on latest SUMC plans and amended as needed to address activity within the dripline area of any existing protected tree to be preserved, including incidental work (utilities trenching, street work, lighting installation, etc.) that may affect the health of a preserved protected tree. The TPR shall be consistent with the criteria set forth in the Tree Preservation Ordinance, Palo Alto Municipal Code Section 8.10.30, and the City Tree Technical Manual, Section 3.00. 5.00 and 6.30. To avoid improvements that may be detrimental to the health of protected trees, the Director of Planning and Community Environment in consultation with the City Urban Forester, shall review the SUMC Project sponsor’s landscape plan to ensure the new landscape is consistent with Technical Tree Manual, Section 5.45 and Appendix L, Vegetative Under New Oaks.

22e.3

The TPR shall be the subject of specific discussion at all planning, design, and construction phases of the project. Feasibility shall consider current site and tree conditions, a tree's ability to tolerate moving, relocation measures, optimum needs for the new location, aftercare, irrigation, and other long-term needs.

The tree relocation permit shall specify that the relocated trees do not survive after a period of five years, the relocated tree shall be replaced at the same site with a tree of the same variety. The tree relocation permit shall specify that the relocated trees do not survive after a period of five years, the relocated tree shall be replaced at the same site with a tree of the same variety. The tree relocation permit shall specify that the relocated trees do not survive after a period of five years, the relocated tree shall be replaced at the same site with a tree of the same variety. The tree relocation permit shall specify that the relocated trees do not survive after a period of five years, the relocated tree shall be replaced at the same site with a tree of the same variety.
BR-4.6 Implement Minor Site Modifications to Preserve Biologically and Aesthetically Significant Protected Trees. The SUMC Project sponsors shall design and implement modifications to building design, hardscape, and landscape to incorporate the below and above ground area needed to preserve the following trees that are both biological and aesthetic tree resources. List applicable trees at EIM 1 and Text 007.

Deleted: as many biologically and aesthetically significant Protected Trees as possible.
22e. Stanford University Medical Center (letter dated July 20, 2010)

22e.1 The commentor requests edits to Mitigation Measure BR-4.1, as presented on page 3.9-26 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.1. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22e.2 The commentor requests edits to Mitigation Measure BR-4.2, as presented on pages 3.9-26 through 3.9-27 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.2. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22e.3 The commentor requests edits to Mitigation Measure BR-4.3, as presented on page 3.9-27 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.3. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22e.4 The commentor requests the deletion of Mitigation Measure BR-4.4 as presented in the Draft EIR on pages 3.9-27 through 3.9-28, and suggests a replacement mitigation measure. Although the City has decided not to delete the mitigation measure in its entirety, edits have been made to Mitigation Measure BR-4.4 (now Mitigation Measure BR-4.4A). In addition, the City has included the commentor’s suggested mitigation measure as Mitigation Measure BR-4.4B. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.

22e.5 The commentor requests edits to Mitigation Measure BR-4.6, as presented on page 3.9-28 of the Draft EIR. Edits have been made to Mitigation Measure BR-4.6. Please refer to Staff-Initiated Change 6 for edits to the Protected Tree mitigation measures.
To: City Council members & City Review Board members,

23.1 As the Stanford Hospital continues its review for development, representatives of the city must now put its ill conceived financial hurdles away and address this review without ‘incentives’ being part of the approval conditions. Both Council & Board members can determine the difference between ‘costs due to development’ and ‘costs due to the city’s fiscal operations’. Do not use this review process as a way of balancing the city’s budgetary failures.

23.2 We support the Stanford University Medical Center Renewal Project and ask the city to bring this project forward by supporting and approving the DEIR.

23.3 The Stanford Hospital and the Lucile Packard Children’s Hospital will bring 21st century facilities to its patients and make this available to all patients and families in Palo Alto while providing care to all those who seek medical care from outside the local community.

Please focus on the benefits that these two hospitals bring as the reason why we must not use this review process for any outside issues that the city needs to address independently.

23.4 The quality of this review process will be reflective as to who we are as a community when asked to perform as a professional and unbiased review body.

Brian & Susan Anuskewicz
Palo Alto

23.1 The commentor is concerned that the City is using the SUMC Project as a way to balance the City’s budget. A Fiscal Impact Analysis was prepared by CBRE Consulting, Inc. in February 2009 to determine the potential tax and fee revenues that would be generated by the SUMC Project. These fees would be required to sufficiently fund the anticipated costs of providing municipal services to the SUMC Project. The analysis used a time horizon of thirty years (2010-2040), consistent with the proposed Development Agreement, which is outlined on pages 2-27 through 2-28 of the Draft EIR. For the monetary impacts of the SUMC Project and the required fees to be paid by the SUMC Project sponsors, please refer to the Fiscal Impact Analysis, which is available at the City’s website.¹

23.2 The commentor expresses support for the SUMC Project. The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Accordingly, no further response is necessary. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

23.3 The commentor questions the review process of the EIR. This comment pertains to the review process and the SUMC Project in general and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review.

Letter 24

To: Mayor Pat Burt and Honorable Members of the Palo Alto City Council

From: Dorothy Bender

Date: July 23, 2010

Subject: Comments on the Stanford University Medical Center Facilities Renewal and Replacement DEIR

ITEM 1: The DEIR should insure that any of the mitigations proposed in Stanford’s Developers Agreement are not redundant with the mitigations proposed in the DEIR.

Discussion:
In the June 15, 2009 memo to City Manager James Keene from Michael J. Peterson, Vice President, Special Projects, Stanford Hospital & Clinics (see page 6), Additional Offered Community Benefits lists the following linkages to encourage use of Caltrain, bus and other transit services, and to enhance bicycle connections between the hospitals and downtown Palo Alto:

- $2.25 million for improvements to enhance the pedestrian and bicycle connection from the Palo Alto Intermodal Transit Center to the existing intersection at El Camino Real and Quarry Road. (It is stated that “the City will be responsible for constructing these improvements.”)

- $400,000 for improvements to the public right-of-way to enhance the pedestrian and bicycle connection from El Camino Real to Welch Road along Quarry Road. (It is stated that “the City will be responsible for constructing these improvements.”)

- Up to $700,000 for improvements to enhance the pedestrian connection between the Medical Center and the Stanford Shopping Center.

The DEIR also lists mitigation measures to manage the significant impacts to intersections during Peak Hour conditions. (See TR-2 of Table S-4 pages S-34 – S40.)

See:

TR-1. Construction Impacts. Construction activity associated with the SUMC Project could result in significant traffic impacts and its Mitigation Measures.

TR-2. Intersection Level of Service. Implementation of the SUMC Project would result in significant impacts to intersections during Peak Hour conditions and its Mitigation Measures.

TR-4. Local Circulation Impacts. The SUMC Project could result in significant traffic impact to the local circulation network in the immediate vicinity of the SUMC Sites and its Mitigation Measures.

The City of Palo Alto should insure that the proposed linkages in the Development Agreement and mitigation measures in the EIR are not redundant.

ITEM 2: The Map in Figure 3.4-10 of the DEIR Showing Future Bicycle and Pedestrian Facilities Is Inadequate since it does not include ALL the mitigations.

Discussion:

See:

TR-6. Bicycle and Pedestrian Impacts. The SUMC Project could impede the development or function of planned bicycle or pedestrian facilities, and result in significant impact and its mitigation measures:

TR-6.1 Bicycle and Pedestrian Infrastructure Improvements. The SUMC Project sponsors shall fund the expansion and improvement of the bicycle and pedestrian network in the immediate vicinity of the SUMC Project. (See page 3.4-76)

The DEIR should add new pages as necessary to the map in Figure 3.4-10 of the DEIR to show all mitigations proposed in TR-6.1 on pages 3.4-76-3.4-77.

Respectfully Submitted,

Dorothy Bender
591 Military Way
Palo Alto, CA
tbender@gmail.com

Comments on Stanford University Medical Center Facilities Renewal and Replacement
Draft EIR July 23, 2010 Page 1 of 2

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
24. Dorothy Bender (letter dated July 23, 2010)

24.1 The commentor requests that the City ensure that the bicycle and pedestrian linkages included in the Development Agreement and the mitigation measures presented in the Draft EIR are not redundant. The Development Agreement is not yet finalized and the City and the SUMC Project sponsors are still in the negotiation process. All comments submitted during the EIR review process, including this comment, will be considered by the City during the finalization of the Development Agreement. Please refer to Master Response 12 for a description of the Development Agreement process and terms.

24.2 The commentor cites Figure 3.4-10 of the Draft EIR concerning bicycle and pedestrian improvements in the immediate vicinity of the SUMC Project and suggests that all mitigation measures suggested by Mitigation Measure TR-6.1 be added to that graphic. The bicycle and pedestrian mitigation measures required by TR-6.1 are described in detail on Draft EIR pages 3.4-76 to 3.4-77. This detailed description adequately conveys the requirements of this mitigation measure.
2010 July 27
To: Palo Alto City Council
C/O: Steven Turner, Planning Dept.
Re: Proposed Stanford Hospital Expansion

We object to the magnitude of the proposed Stanford Hospital Expansion. We do favor improvements to make facilities earthquake safe and to modernize, but the enormous nature of what is planned is too too much. We are sure Stanford and the community will benefit from changes and additions much smaller than those being funded.

Thank you for taking our view into account.

Sincerely,

Melvin & Robin Bernstein
726 Loma Verde Ave.
Palo Alto 94303,

25.1 *The commentor expresses opposition to the SUMC Project.* The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

*The commentor also states that the building program proposed for the SUMC Project is too large.* As explained on page 2-22 in Section 2 of the Draft EIR, Project Description, the SUMC Project requires additional floor area due to existing spatial constraints and the growing demand for outpatient services. Current spatial constraints at the SHC and LPCH facilities restrict the SUMC’s ability to serve new patients; therefore, expansions are necessary to provide the optimal level of care for new and existing patients. At both hospitals, the number of patients turned away will increase unless additional patient beds are provided. In addition, hospital expansion is necessary because the American Academy of Healthcare Architects recommends that all beds be in private rooms, which require ‘right-sizing’ under the SUMC Project. With regards to outpatient services, in order to accommodate the growing demand, the hospitals propose to construct new and replacement clinics on the Main SUMC Site, as well as renovate the existing Hoover Pavilion building and construct a new building for use as clinics and medical office space.

Several SUMC Project alternatives are discussed and analyzed in Section 5 of the Draft EIR, Alternatives, that seek to reduce the size of the SUMC Project. No Project Alternative A, No Project Alternative B, Reduced Intensity Alternative A, and Reduced Intensity Alternative B, all propose to reduce the building floor area and construction of the SUMC Project. Please refer to Master Response 8 for an explanation of alternatives to the SUMC Project.
To: Steven Turner, Dept. Planning  
24 July 2010  
250 Hamilton Ave. 5th Floor  
Palo Alto, CA 94301  

From: Charlie Bourne, 1619 Santa Cruz Ave., Menlo Park, CA 94025  

Re: Comments for Stanford Medical Center Draft EIR  

The following comments should be added to the City’s response to Stanford/Palo Alto SUMC Draft EIR.  

1. Insufficient attention given to traffic impact on Menlo Park streets and intersections  

Insufficient attention is given to roadway segments in Menlo Park that funnel traffic from, through, or around Menlo Park to the Stanford Medical Center (SUMC) complex. We can expect a significant impact from some of the expected incremental work force, Clinic patients/visitors, and others. Examples of such road segments would include the following:  

- **Oak Ave.** The recent EIR for Oak Knoll School identified this segment as a very busy choke point that funnels traffic between Sand Hill Rd. and West Menlo. This location has been the subject of several studies and attempts by the City’s Transportation Dept. to improve a dangerous traffic situation there. The recent Oak Knoll School EIR noted that this segment was already at a critical level of service; consequently, the extra SUMC traffic would only make this an impossible situation for this residential neighborhood. This new traffic adds to an already dangerous situation with many elementary school children and parents with small children walking on this street. And because Oak subsequently splits into other streets, those tributaries should also be examined. All of these streets should be examined.  

- **Valparaiso Ave. and others.** Incremental traffic southbound on 101 headed for SUMC is likely to turn off at Marsh Rd., continue left on Middlefield, turn right to get to Valparaiso Ave., and then continue to the Alameda, or take a choice of cut-through streets at Elder, Hillview, Orange, or others to get to Sand Hill. All of the streets associated with a round-about route to SUMC should be examined.  

- **Willow Rd. and others.** Some incremental southbound traffic on 101 may turn off at Willow Rd., an already choked road with a low level of service for most of its intersections west of 101, and on the street itself. The recent report for the C/CAG Peninsula Gateway Corridor 2020 Project showed existing problems with that street and its intersections. The intersection of Willow and Newbridge was identified as already having an F-level of service at peak hours, even without considering the Bohannon or SUMC projects or future growth. This intersection wasn’t even mentioned in the SUMC presentations.  

2. No consideration given to cumulative impact from other projects. This DEIR did not consider several other relevant projects, including:  

- **Bohannon Gateway project.** If this project is approved by Menlo Park voters in November, this will then become a real project that must be considered in the SUMC EIR.  

- **Downtown Menlo Park and El Camino Vision Project.** Major traffic issues have already been identified as potential impacts as a result of the changes proposed by new zoning and development for this part of Menlo Park.  

- **Stanford Shopping Center expansion.** The expansion proposed some time ago, and then withdrawn, would have an extremely damaging effect on Menlo Park traffic, noise, and other quality of life considerations. Stanford noted when that proposal was withdrawn, that they wanted to concentrate on the hospital first, and bring the shopping center back later. We thus face the possibility that after the current proposal is approved, the Shopping Center proposal will be brought forward. Given that admitted planning, Stanford should be required to include the Shopping Center project in this EIR.  

3. Traffic mitigations.  

- As another traffic mitigation, plans should be made for building parking areas or structures off-campus, with frequent bus service from the parking locations to the SUMC and campus. A location on Stanford property adjacent to the 280/Sand Hill interchange is a prime candidate for such a location. Another location is the new Stanford medical campus in Redwood City. The Marguerite bus service already goes to both locations.  

- Much of the traffic mitigation depends upon the significant increase in the use of Caltrain. But with its current financial difficulties, there is a real possibility that Caltrain may not be around at
some point during the course of this project build-out. What is the backup plan for that possibility?

- Open Sand Hill at ECR for thru traffic from Sand Hill to continue across ECR into Palo Alto. This would remove some of the Menlo Park ECR traffic that turns left from Sand Hill and then makes a U-turn at the first signal light in Menlo Park to return back to that S.H./ECR intersection where a left turn from ECR into Palo Alto is permitted.

- Change the signal at Sand Hill to prevent left turns from east-bound Sand Hill traffic into Oak.

26.1 The commentor states that insufficient attention is given to roadway segments in Menlo Park that funnel traffic to and from the SUMC Project. Daily traffic volumes were collected on Oak Avenue in September 2010. Using City of Palo Alto criteria, a significant impact would result if the TIRE index for a local or collector residential street increased by 0.1 or more. The existing TIRE Index for Oak Avenue is 3.4, the 2025 Future Without Project TIRE Index is 3.4, and the 2025 Future With Project TIRE Index would also be 3.4. An increase of 650 daily vehicles is needed to trigger an increase in the TIRE Index. Before the implementation of mitigation, the SUMC Project is expected to contribute no more than 100 daily trips. As such, the SUMC Project traffic would not cause a change in the TIRE Index and, therefore, does not constitute a significant impact according to the City of Palo Alto standards of significance. The SUMC Project would not negatively impact Oak Avenue.

Using City of Menlo Park criteria, an increase of 25 trips or more per day would be a significant impact. However, with implementation of enhanced transportation demand management (TDM) measures, the SUMC Project would add fewer than 25 trips per day in this location. Therefore, both the City of Palo Alto and Menlo Park’s significance criteria indicate that the SUMC Project would have a less than significant impact to Oak Avenue. As such, the amount of project trips along the “tributaries” of Oak Ave is not expected to cause a significant impact as well.

26.2 The commentor states that SUMC Project traffic traveling southbound on US 101 is likely to exit on Marsh Road, and use various side streets to get to Sand Hill Road. The Transportation Impact Analysis (Appendix C of the Draft EIR) evaluated SUMC Project traffic that exited US 101 at Marsh Road and travelled various routes through Menlo Park. Specifically in West Menlo Park, the Transportation Impact Analysis evaluated Santa Cruz Avenue, Sharon Road, Stanford Avenue, Leland Avenue, and Vine Street. SUMC Project-specific traffic impacts were not found to occur for any of these streets. Therefore, other adjacent streets would not experience a significant SUMC Project impact.

26.3 The commentor states that there may be an increase in southbound traffic exiting US 101 at Willow Road, which could impact the intersection of Willow Road/Newbridge Street. The analysis of impacts to the Willow Road/Newbridge Street intersection has been included in Staff-Initiated Change 2 (see intersection #70).

26.4 The commentor states that the Willow Road/Bayfront Expressway intersection already operates at LOS F, but the SUMC Project sponsor’s presentation was not adequate to reflect the seriousness of the situation. The Transportation Impact Analysis found that the Willow Road/Bayfront Expressway intersection currently operates at LOS E. The analysis also found that the SUMC Project would have a significant impact at this intersection. The
SUMC Project would be required to contribute a fair share financial contribution to this intersection to implement the improvements noted in the City of Menlo Park’s Traffic Impact Fee program. See Staff-Initiated Change 2.

26.5 The commentor states that the recent EIR for the Bohannon Menlo Gateway project estimated it would decrease the service levels in the Willow Road region. Furthermore, the impacts from that project have not been included in the SUMC Draft EIR. Please refer to Master Response 3 for a discussion on background growth.

26.6 The commentor notes that the new Stanford Medical Campus in Redwood City was recently developed and expanded and, as such, there would be traffic traveling between the Redwood City campus and SUMC. The basis of the Transportation Impact Analysis for trip generation was the existing SUMC facility. Traffic counts were collected at the existing facility. As discussed on page 3.4-45 of the Draft EIR, trip generation rates were developed from those counts and the existing facility size. These rates were then used to determine the additional traffic generated by the expanded SUMC facility. The clinics that were relocated to Redwood City are self-contained. Patients do not travel between Redwood City and Palo Alto for treatment. Some faculty members or researchers may travel between the two sites on some days, but this is not expected to be frequent. The faculty tends to have clinic days and teaching days so they normally go to one facility or the other. The number of inter-campus trips would likely be relatively small on a given day.

26.7 The commentor states that future development plans for several acres of Stanford property on El Camino Real have not been disclosed and they should be included in the SUMC Draft EIR as a cumulative impact. There are currently no plans for the Stanford land located in Menlo Park. The City of Menlo Park is considering a Specific Plan that would govern these lands, but the City has not completed its EIR for the Specific Plan and the plan has not been approved. Please refer to Master Response 3 for a discussion on background growth.

26.8 The commentor notes that the Draft EIR does not consider several other relevant projects in the cumulative analysis, including projects in Menlo Park and the Stanford Shopping Center Project. Please refer to Master Response 3 for a discussion on background growth and cumulative impacts pertaining to traffic impacts. Per CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. According to CEQA Guidelines Section 15130(b)(3), “Lead agencies should define the geographic scope [or context] of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.” The geographic context is typically tailored to the nature of the environmental issue/impact and resource or population being affected. Each discussion of cumulative impacts in Sections 3.2 through
3.15 of the Draft EIR includes an explanation of the relevant geographic context. Depending on the topic, the geographic context could be localized or regional. For example, the cumulative context for air quality would include the larger regional air basin.

As stated on page 3.1-2 of the Draft EIR, CEQA Guidelines Section 15130(b) requires that an EIR’s analysis of cumulative impacts should be based on either a list of past, present, and probable future projects producing related impacts or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document. The cumulative projects analyzed in the Draft EIR rely on both a list of projects within Palo Alto and regional growth projections. The list of foreseeable projects within the City of Palo Alto was provided by City staff and included in the analysis (see Appendix B to the Draft EIR). Growth projections applied to the cumulative analysis in the Draft EIR include forecasted growth in adjacent cities other than Palo Alto. Growth projections also include growth allowed under the Stanford University 2000 CP/GUP, the Association of Bay Area Governments (ABAG) Projections 2005, the Bay Area Air Quality Management District’s (BAAQMD) air quality projections, the City of Palo Alto’s Travel Demand Forecasting Model, and projections of various public service and utility providers for the SUMC Project. See pages 3.1-2 through 3.1-6 for a discussion of the cumulative scenario.

In regards to the Shopping Center Project, the commentor states that when Stanford withdrew the application for the Stanford Shopping Center expansion, Stanford affirmed that it wanted to consider the Shopping Center Project at a later date. However, this is incorrect. As explained on pages 3.1-3 to 3.1-4 in Section 3.1, Environmental Analysis, the Stanford Shopping Center expansion is not considered a reasonably foreseeable project in the City and is, therefore, not included in the cumulative project list assumed in the Draft EIR. As described in the Draft EIR, the Simon Property Group submitted an application in 2007 to expand the Stanford Shopping Center and construct a boutique hotel. However, this application was withdrawn in April 2009. Given Stanford University’s statement that it intends to focus its development efforts on the SUMC Project, and due to the current economic downturn and changing retail trends, the scope of any future development at the Stanford Shopping Center is too speculative to analyze at this point. As stated by Stanford, the Shopping Center expansion is no longer before the City for its consideration and there are no foreseeable plans, proposals, or programs in place that would bring the Shopping Center expansion back to the City for approval at a later time. Therefore, the Stanford Shopping Center expansion is not considered a probable future project for the purposes of the cumulative impact discussion, per CEQA Guidelines

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2 Barbara Schussman, Bingham McCutchen LLP, Letter to Cara Silver, Senior Assistant City Attorney, April 16, 2009.
Section 15130. Nevertheless, some background growth at the Stanford Shopping Center is included in the City’s regional traffic model.

26.9 The commentor states that traffic mitigation for the SUMC Project should include parking areas near I-280 and Sand Hill Road and the new Stanford Medical Campus in Redwood City with shuttle buses carrying passengers between the remote parking areas and the SUMC site. Please refer to Master Response 2 for a discussion on remote parking.

26.10 The commentor states that the traffic mitigation for the SUMC Project relies heavily on the expanded use of Caltrain. However, the commentor states that Caltrain is having financial difficulties and may not be able to provide the service anticipated. Please refer to Master Response 1 for a more detailed discussion on the viability of the GO Pass mitigation measure.

26.11 The commentor requests that the Sand Hill Road/El Camino Real intersection be modified to allow traffic to travel east/west across this intersection. The intersection geometrics and permitted movements at the Sand Hill Road/El Camino Real/Alma Street intersection have been established by the City of Palo Alto. Modifications of these geometrics would not change the impacts associated with the SUMC Project. Changing the travel patterns through this intersection is not an improvement that is tied to the SUMC Project.

26.12 The commentor requests that the traffic signal at the Sand Hill Road/Oak Avenue intersection be modified to eliminate the eastbound left turn from Sand Hill Road onto Oak Avenue. The eastbound left turn from Sand Hill Road to Oak Avenue is not a traffic movement that would be used by traffic traveling to and from the SUMC Project site. The modification of this intersection as suggested in the comment is not part of the SUMC Project and would need to be addressed through a separate transportation and environmental analysis.
Dear Commissioner/Council Member:

The traffic impact at key intersections, including Middlefield/Willow, will seriously impact the Palo Alto North neighborhood streets Everett and Hawthorne. These two streets currently have the highest cut-through traffic in the city, based on traffic counts prior to the 'barrier' uproar in 2004, and has increased considerably since then. A 2004 traffic survey indicated Stanford as the destination for much of this traffic. These streets have become extremely hazardous to cyclists and pedestrians, and the additional car trips to Stanford Hospital will become disastrous for the neighborhood's safety.

Lyton Avenue's traffic lights and turn lanes were improved as a result of the Downtown North study and the avenue was repaved, but drivers still prefer to avoid stoplights by using Everett and Hawthorne on their way to Stanford and other destinations. Have you considered the situation in North Palo and if so, how would you plan on mitigating the effects of this traffic?

Respectfully,

Irv Brenner
250 Byron Street
Palo Alto
327-3981
27. Irv Brenner (letter dated July 21, 2010)

27.1 The commentor states that the traffic impact at key intersections such as at Willow Road/Middlefield Road will impact the Palo Alto North neighborhood streets such as Everett Avenue and Hawthorne Avenue. Turn restrictions at Middlefield Road and at Alma Street (southbound Middlefield Road has right-turn restrictions at Hawthorne Avenue and Everett Avenue from 7:00 to 10:00 a.m.; southbound Alma Street has left-turn restrictions at Hawthorne Avenue and Everett Avenue from 7:00 to 10:00 a.m. and 3:00 to 6:00 p.m.) reduce the use of these streets as cut-through routes. However, once on Lytton Avenue, traffic can divert over to Everett Avenue and Hawthorne Avenue. Both Everett Avenue and Hawthorne Avenue were included in the Transportation Impact Analysis. The City uses the TIRE Index to determine if a residential street is impacted by a project. A 0.1 change in the TIRE Index constitutes a significant impact. As noted in Draft EIR Table 3.4-20, on page 3.4-71, the SUMC Project did not constitute a 0.1 change in the TIRE Index. Although the SUMC Project is expected to add traffic to Everett Avenue and Hawthorne Avenue, the added traffic is not projected to be large enough to constitute a significant impact.

27.2 The commentor notes that the Lytton Avenue traffic signals and turn lanes were improved as part of the Downtown North study, but drivers continue to use Everett Avenue and Hawthorne Avenue on their way to Stanford and is concerned how this traffic would be mitigated. Cut-through traffic through North Palo Alto has been an on-going issue. Turn restrictions have been implemented at both the Middlefield Road end and the Alma Street end to help control traffic. However, drivers continue to use both Everett Avenue and Hawthorne Avenue to travel to and from the Stanford area, either by ignoring the turn restrictions or by initially turning onto Lytton Avenue and then back to Everett Avenue and Hawthorne Avenue. The Draft EIR considered the effect of the SUMC Project expansion on North Palo Alto streets. Draft EIR Table 3.4-20 on page 3.4-71 shows the results of the TIRE analysis. While the SUMC Project may add approximately 125 vehicle trips per day to these two streets, it would not result in a significant impact according to City of Palo Alto standards of significance.
Letter 28

To: Palo Alto City Council

7/32/2010

From: Beth Bunnemeyer

Re: Response to Draft EIR Stanford University Medical Center Plans: Hoover Pavilion and the 1959 Stanford Hospital designed by Edward Durell Stone (Cultural Resource)

The City of Palo Alto has accepted the Secretary of Interior Standards as the standard for reviewing historic properties and proposed changes.

1. Plans for the Hoover Pavilion (1938-39) appear appropriate with perhaps a little more definition of the treatment of the entry façade, where the new windows replace the recessed stairs. Preservation of all the original windows in the building is a more desirable preservation alternative. The original zigzag Art Deco style is well maintained in the submitted plans.

2. Plans for the 1959 Stanford Hospital designed by Edward Durell Stone, call for its demolition. Please refer to the Architectural Resources Board peer review of September 2009 for full assessment of this project with reviews of Federal and state CEQA standards. ARG finds the Stone designed hospital appears eligible for listing on the California Register of Historic Resources under criteria:

A. Event - the first heart transplant in the United States in 1968 was a milestone in medicine.

B. Person - Dr. Norman Shumway for his outstanding research and body of work in the field of heart transplants.
7/23/2010

7/23/2010

Att: Draft EIR Stanford Medical

Please keep me informed about the project.

✓ I have the following comments: The 1897 E. D. Stone Main Hospital building has been evaluated by ARB as being historic. CEQA rules apply. This building is the work of an internationally known architect and the first heart transplant was done in this building. It should not be demolished. The preservation alternative from ARB provides solutions to retrofit the 1897 building for reuse as medical offices.

Name: Beth Brennberg

Address: 2851 Ramona, Palo Alto, CA 94301

Phone

Email

28.1 The commentor expresses support for the renovation of Hoover Pavilion as proposed under the SUMC Project, but requests more definition of the treatment of the entry façade. In response to this request, the Architectural Resources Group (ARG) has provided a further analysis of the Hoover Pavilion renovation. Please refer to Staff-Initiated Change 5 for more details regarding the Hoover Pavilion renovation.

28.2 The commentor believes that the demolition of the Stone Building complex would result in significant and unavoidable impacts and refers to ARG’s peer review. This statement is consistent with the findings in the Draft EIR under Impact CR-1 on pages 3.8-18 through 3.8-23. As noted on page 3.8-21 of the Draft EIR, implementation of Mitigation Measures CR-1.2 through CR-1.4 would reduce the impacts from the loss of the Stone Building complex; however, the impact would remain significant and unavoidable due to the demolition of the buildings. The analysis in the Cultural Resources section, Section 3.8 of the Draft EIR, considers the findings from ARG’s peer review in reaching this significance conclusion. Because the City has concluded the Stone Building complex is eligible for listing on the California Register of Historic Resources (CRHR), the Stone Building complex is considered an historic resource for the purposes of the Draft EIR.

28.3 The commentor requests consideration of the cumulative impacts of demolishing an E.D. Stone building within Palo Alto. As described on page 3.8-27 of the Draft EIR, Cultural Resources, E.D. Stone constructed three other buildings within the City in addition to the Stone Building complex. However, according to an evaluation by ARG, only one of these buildings, the Palo Alto Main Library, has been determined eligible for the National Register of Historic Places. The library is planned to undergo renovation and expansion, which could impact its historical integrity. In combination with the SUMC Project, development at the Main Library and other historic buildings in the City would have cumulatively significant impacts on historic resources. As stated on page 3.8-27 of the Draft EIR, the demolition of the Stone Building complex would have a cumulatively considerable significant and unavoidable impact due to the small body of E.D. Stone’s work present in the City that retains sufficient integrity to be eligible as historical resources. Therefore, the conclusions in the Draft EIR are consistent with the commentor’s remarks.

28.4 The commentor expresses support for the Historic Preservation Alternative and supports using the Stone Building complex for medical office space. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process, along with an analysis of the variation on the Historic Preservation Alternative suggested by the commentor.
28.5 The commentor states that the Stone Building complex has been evaluated by ARG as being historic. Please refer to Response 28.2, above.

28.6 The commentor expresses support for the Historic Preservation Alternative. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives. In addition, please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.
I attended the City Council meeting on Monday, June 7, 2010 but was unable to stay late enough to present my comments concerning the hospitals renewal project so I am sending them to you via email.

My name is Diane Churchill, I am a resident of Midtown and I am here to show support for the hospitals' renewal plan. I have two comments.

For the last several years I have watched in dismay as the application and approval process has dragged on. It seems to me that the city council would not want to delay in getting the project moving since this is not Stanford's hospital that is being debated - it is the city's community hospital - it is the over crowded emergency room you would go to in a medical emergency and the out of date hospital your family will use for serious health care. It is in your best interest and the best interest of the Palo Alto community to move forward without delay so we have a seismically safe, modern, community hospital.

Secondly, I'd like to speak to the public service and generosity of Stanford Hospital. I am the director of the Stanford Hospital Lifeline program - an emergency in-home response system that saves lives and helps people live at home safely. Each year, Stanford Hospital contributes more than $30,000 to the community by subsidizing those in our community who cannot afford the cost of this service - anyone who needs the Lifeline service will have it thanks to the generosity of Stanford Hospital. I believe it is with the same generosity that the hospital has responded to the mitigation issues.

I urge you to move forward without further delays to a timely approval of the renewal plan.

Diane Churchill, Lifeline Director
Stanford Hospital & Clinics, Aging Adult Services
1101 Welch Road, C-1, Palo Alto, CA 94304
P: 650.723.6906, F: 650.738.7186
dchurchill@stanfordmed.org
www.geriatric.stanfordhospital.com

6/10/2010

29.1 The commentor supports the SUMC Project and requests no further delays in the SUMC Project approval process. Reasons for the publication delay of the Draft EIR include site plan modifications and application updates by the SUMC Project sponsors in order to meet Office of Statewide Health and Planning Development (OSHPD) requirements; the withdrawal of the Stanford Shopping Center Project from the analysis of the Draft EIR; and changes in the City’s Traffic Model. The comment concerns the EIR process and does not relate to the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the SUMC Project and EIR review process.

29.2 The commentor expresses support for the SUMC Project. The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
Dear Steven Turner,

My husband and I heartily agree with Ken Hake in his recent letter to you regarding his concern for traffic in North Palo Alto. We live on Hawthorne Avenue between Cowper and Webster and have four young boys who are always playing on the sidewalks in front of our house. My husband commutes daily on his scooter to the train station, and I frequently ride bikes with the children to school. All of us in our block appreciate the congenial nature of a neighborhood where our children can play on the streetsides of our homes. An increase in commuter traffic on our already highly trafficked street would greatly affect our children’s safety.

Please let us know what we can do to help maintain safe and quiet streets in North Palo Alto.

Thank you!

Katrina and James Currier
558 Hawthorne Avenue 415-254-1626

On Wed, Jul 21, 2010 at 2:01 PM, Ken Hake <kkhake@sbcglobal.net> wrote:
To Steven Turner - Department of Planning and Community Environment,

For the record: I am a homeowner and resident living at 575 Everett Ave in the Downtown North neighborhood. I have three children who play outside everyday in front of our house. I bike to work most days and am a fervent supporter of having walkable, bikeable, livable neighborhoods. I have been watching the progress of the discussions with Stanford and am concerned about the impact to traffic for the Downtown North neighborhood. I am deeply concerned that the project will increase the amount of commuter traffic running through our neighborhood. Historically, our neighborhood has fought hard to decrease the amount of traffic in our neighborhood. A few years back, we were successful in getting some traffic mitigating devices in the neighborhood and this has helped. I don’t want to see us take a step backward in this effort. Do we have any projections as part of the impact report that show what will happen on the residential roads in our neighborhood. I read recently that the intersection at Middlefield and Willow road will see a dramatic increase. I can imagine that there is a high probability that our neighborhood will also see an increase. If so, this is not an acceptable outcome.

What are the options for implementing stronger traffic calming devices in the neighborhood to make sure we aren’t adversely affected. Right now we have "No Turn" signs during peak periods. I continually see cars ignore the signs and we don’t have the police resources to adequately monitor this. I have called the department a few times on this point and they will send an officer out once in a while, but can’t do it everyday. Is it possible to block off the entry points for Everett & Hawthorne in some workable traffic calming configuration? Similar to what they have done in the College Terrace and Evergreen Park neighborhoods?

Please let me know what I can do to ensure there is no increase to the traffic in our neighborhood.

Regards,

Ken Hake
575 Everett Ave
Palo Alto, CA 94301

30.1 The commentors state that they agree with Ken Hake’s letter concerning traffic in North Palo Alto and believe an increase in traffic in this area would greatly affect the safety of children. The Transportation Impact Analysis for the Draft EIR considered the two primary streets in Downtown North: Everett Avenue and Hawthorne Avenue. Draft EIR Table 3.4-20 on page 3.4-71 shows the results of that analysis. As shown in the table, both Hawthorne Avenue and Everett Avenue are expected to see an increase in traffic as a result of the SUMC Project (before mitigation) of 127 vehicle trips per day. The City of Palo Alto uses the TIRE index to determine if an increase in traffic on a residential street results in a significant impact. The increase projected for Everett Avenue and Hawthorne Avenue would not result in a significant impact.
Letter 31

From: Janet Davis [mailto:jadjadjad@sbcglobal.net]
Sent: Saturday, May 22, 2010 9:21 AM
To: city.council@menlopark.org; Council, City
Cc: Rich Gordon; Lennie Roberts
Subject: SUMC EIR

I have just started looking at this and the very first thing I looked at was downright wrong. Figure 3.4.3. showed a class 1 bike path along the entire length of Alpine Road. Not so! The study did show that the on and off ramps at Alpine and I-280 would be at “F.” This is a no-brainer since they are already beyond that, and traffic is often backed up for long stretches along the freeway until quite late in the morning. The study failed to address the intersections of Stowe Lane, Bishop Lane, Ansel Lane, the “Dish” parking problems or the difficulties (TIRE analysis) that the residents of Stanford Weekend Acres already experience trying to access (let alone cross!) Alpine Road. The study was also in error in its calculation of what constitutes “rush” hour along Alpine Road. That starts before 7 a.m. at which time around more than 90% of the traffic heads to Stanford. There is a minor “rush” at lunch time and a more extensive rush when the medical staff change shifts at the hospital around 3 p.m. It did not address the level of accidents, the blind corners, the problems with speeding that occurs in off hours, the minor landslides and the winter flooding.

I live on Alpine and and usually come and go by car, bike or foot several times a day. I have never seen any traffic engineers doing a study anywhere in the vicinity and have no confidence that one was actually done.

31.1 The commentor notes that Draft EIR Figure 3.4-3 is incorrect in that the figure shows a Class I bike path on Alpine Road from Junipero Serra Boulevard to the I-280 interchange. Draft EIR page 3.4-21, Figure 3.4-3, is revised as described in Staff-Initiated Change 2 and shown in Appendix T to this document. The Class I bike path along Alpine Road ends north of Stowe Lane. There is also a designated bike trail from Piers Lane going into San Mateo County but it does not meet the width requirements set out in the Caltrans Highway Design Manual for Class I bike path and is not reflected in the revised figure.

31.2 The commentor states that the Transportation Impact Analysis identified the existing conditions for the I-280 off-ramps at Alpine Road, but the analysis failed to address other intersection, parking, and access issues. The commentor further states that the Transportation Impact Analysis for the SUMC Project did not address Stowe Lane, Bishop Lane, Ansel Lane, the “Dish” parking problem, or the difficulties accessing Alpine Road with the TIRE analysis. The Transportation Impact Analysis followed the requirements for traffic studies established by the Santa Clara County Congestion Management Agency (CMA). The analysis of minor, unsignalized intersections is not required by the CMA. For the Final EIR, the TIRE analysis was conducted for Alpine Road. The results of the analysis indicate that no impact from the SUMC Project would occur. The existing TIRE Index is 4.3, the 2025 without project TIRE Index is 4.4, and the 2025 with project TIRE Index would remain at 4.4. An increase of 6,600 daily vehicles is needed to trigger an increase in the TIRE Index. The project is expected to contribute no more than 600 daily trips at this location before the implementation of mitigation measures. As such, the project traffic would not cause a change in the TIRE Index and, therefore, does not constitute a significant impact according to the City of Palo Alto standards of significance. The project would not negatively impact Alpine Road between Junipero Serra Boulevard and the I-280 interchange; nor would it contribute to parking problems at the “Dish.”

31.3 The commentor states that the Transportation Impact Analysis did not consider the appropriate Peak Hours for Alpine Road. The Transportation Impact Analysis considered both the AM (7:00 to 9:00 a.m.) and PM (4:00 to 6:00 p.m.) Peak Periods. Within these Peak Periods the Peak Hour was established. A common Peak Hour was selected for study area intersections, such as 7:30 a.m. to 8:30 a.m. and from 4:45 p.m. to 5:45 p.m. Traffic analysis procedures are based on the hour during the a.m. and again during the p.m. when the greatest amount of traffic is present on the transportation network. Even though the Peak Period may begin before 7:00 a.m., the greatest amount of traffic during a one-hour period occurs after 7:00 a.m. and that is the hour that was addressed in the Transportation Impact Analysis. In addition, a typical traffic analysis only considers the weekday AM and PM Peak Hours. Even though an individual intersection may have a concentration of traffic during some other period, the analysis addresses the traffic levels that occur when the overall transportation network experiences the greatest traffic loads.
31.4 The commentor notes that the Transportation Impact Analysis did not address the level of accidents, blind corners, problems with speeding that occurs in off hours, minor landslides, and winter flooding. The issues identified in the comment are not typical issues addressed in a Transportation Impact Analysis for a development project such as the SUMC Project. Accident issues are typically associated with inadequate geometric roadway design or traffic control facilities. The blind corners, speeding, landslides, and flooding on Alpine Road are not associated uniquely or specifically with the SUMC Project.

31.5 The commentor questions whether a traffic study was completed since they did not notice anyone in the field. The Transportation Impact Analysis for the SUMC Project was initiated in 2007 and continued into 2010. The typical types of field investigations that occur when traffic engineers are present are traffic volume counts during the AM and PM Peak Periods, collection of traffic control and roadway geometrics, and observation of general traffic conditions. Some of this information may be collected from other recent studies and not re-collected in the field.
Ruchita Kadakia

From: Diana Shu <dshu@co.sanmateo.ca.us>

Sent: Thursday, July 22, 2010 3:20 PM

To: Janet Davis; Stanford Project
Cc: Jim Porter

Subject: Re: Alpine Road

Dear Ms. Davis

Thank you for your comments. We support the Stanford's Project proposal to install a signal light at Alpine and I280.

I'll pass your request to the Stanford Project, via this email so that they may address your concerns in their EIR.

Sincerely,

Diana

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32.1

This morning at 9:30 I tried to leave my driveway on Alpine Road to go to the post office. At the same time, the Cal Water truck and the PG&E meter reader were all trying to get onto the road. We were all stuck there for many minutes with traffic absolutely refusing to let any of us in. Coming back 15 minutes later I moved into the turn lane to enter my driveway. A long line of cars heading to I-280 were backed up behind a large SUV whose driver was on her cell phone honking at me. Between I-280 (on both sides of the road) are cautionary signs alerting people to drive at 25 or 30 mph. However, the speed sign at the Buck Estate (corner of Alpine and Santa Cruz) states 40 m.p.h. This is a totally ridiculous speed limit for the traffic conditions - especially in view of all the driveways and cross roads. Even with the 40 mph limit, outside of rush hours, traffic careens down Alpine around 50 + mph endangering residents and cyclists. The situation is even more dire in winter when Stanford is in session. The situation is only going to get worse with the hospital expansion and possible shopping center expansion.

So far, the county (and possibly Menlo Park) has not responded to the impact on this area of the expansion, and needs to asap. Stanford is about to narrow Junipero Serra which will throw more traffic onto Alpine Road. Traffic lights are needed near I-280 to meter the flow and some alternative route needs to be explored - possibly a tunnel.

32.2

Of immediate concern is the reduction of the posted speed limit from 40 to 30 mph since this area is a medium density residential enclave nestled between several blind curves. Also more traffic enforcement is needed.

32.3

One area that the city of Menlo Park needs to address is the frequent use of the back entrance to the Buck estate as a turn around site. People constantly make U-turns across all the traffic to head back to Stanford.

Janet Davis
32. Janet Davis (letter dated June 22, 2010)

32.1 The commentor is concerned with the speed limits on Alpine Road. The SUMC Project sponsors do not establish the speed limit on Alpine Road nor are they charged with its enforcement. These issues are enforcement issues rather than SUMC Project impacts, and are under the jurisdiction of Menlo Park and San Mateo County.

32.2 The commentor states that the County and Menlo Park have not responded to the SUMC expansion project, and is concerned about various traffic issues on or near Junipero Serra Boulevard and I-280. Both San Mateo County (as included in Letters 5 and 6 of this document) and Menlo Park (as included in Letter 8 of this document) commented on the Draft EIR for the SUMC Project. There are no plans by Stanford to reduce the traffic capacity of Junipero Serra Boulevard. As currently contemplated, the Junipero Serra Boulevard roadwork (which is not part of the SUMC Project) would include a median and bulb-outs in three locations. The Junipero Serra Boulevard (JSB) roadwork is intended to slow traffic to the posted speed and eliminate unsafe left-turns onto and off of the road. Santa Clara County would be the lead agency for the roadwork project.

The specifics of a tunnel, where it would start and stop, and other features are not included in the comment. The construction of a tunnel in the vicinity of Alpine Road is beyond the scope of the SUMC Project.

32.3 The commentor states several issues with speed limits on Alpine Road and traffic concerns with Buck Estates. These issues are enforcement issues rather than SUMC Project impacts.
From: Janet Davis [mailto:jadjadjad@sbcglobal.net]
Sent: Tuesday, July 27, 2010 1:52 PM
To: Council, City
Cc: Rich Gordon; Lennie Roberts
Subject: Hospital expansion - EIR INPUT

I haven't heard a peep out of the County of San Mateo with respect to input, which is not unusual, since they never seem to get around to interacting with other jurisdictions to solve problems. However, I live on Alpine Road and use Santa Cruz Ave in the unincorporated part of Menlo Park. The Stanford traffic is already beyond what these roads can bear. It is unconscionable to further burden them with the inevitable traffic to the hospital. Stanford has to do more than put a traffic light at I-280. It needs to dig a tunnel from 280 to the main area of campus to carry a good part of the traffic that gets dumped on residents in other jurisdictions, and also open up some of the feeder routes like Stanford Ave. I live within walking distance of the hospital. However, going by car (and finding parking) at times could take almost as long, without yet more traffic. Also, you have to bear in mind that Stanford plans to expand the shopping center. I'm all for an improved hospital, but people have to get there before they die waiting in a grid locked traffic jam. Palo Alto also needs to allow Sand Hill Road traffic go through to Alma instead of turning left at El Camino and making a U-turn in Menlo Park to go to Alma in Palo Alto. Janet Davis Alpine Road MP

33.1 The commentor states that she is not aware that the County of San Mateo has provided input on the SUMC Project. Since the SUMC Project is located in close proximity to the County of San Mateo, the County was encouraged to submit comments on the Notice of Preparation (NOP) and the Draft EIR.

In August 2007, the City distributed the NOP and announced its intent to prepare an EIR analyzing potential impacts of the SUMC Project. No comment letters were received from the County of San Mateo during the NOP scoping period. However, the County of San Mateo Planning and Building Department submitted a comment letter on the Draft EIR on July 27, 2010 (see Letter 5 of this document). The County’s comment letter pertains to traffic impacts to intersections in the unincorporated County and transit impacts to Caltrain, SamTrans, and the Marguerite Shuttle. In addition, the letter requests that the Draft EIR be revised to include the San Mateo County Level of Service Standards. Please see Letter 5 for comments from the County of San Mateo and Responses 5.1 through 5.9.

33.2 The commentor is concerned with the level of traffic on Alpine Road and Santa Cruz Avenue and suggests that the SUMC Project sponsors build a tunnel from I-280 to the central part of campus to remove traffic that affects residents in adjacent jurisdictions. The construction of a tunnel from I-280 to the central part of the Stanford University campus is not required to reduce to significant traffic effects of the SUMC Project.

33.3 The commentor states she lives within walking distance of the hospital, but that traveling to the hospital by car and finding parking at times takes just as long as walking. The Transportation Impact Analysis addressed the existing levels of congestion surrounding the SUMC Project site. In addition, the availability of parking and future parking demand was addressed in the Transportation Impact Analysis. An additional 10 percent of parking supply was added to reduce, to the extent feasible, recirculation to find a vacant parking space. The SUMC Project is making bicycle, pedestrian, and transit improvements that encourage trips to be made by non-automobile modes if possible.

33.4 The commentor notes that Stanford plans to expand the Stanford Shopping Center. As explained on pages 3.1-3 to 3.1-4 in Section 3.1, Environmental Analysis, the Stanford Shopping Center expansion is not considered a reasonably foreseeable project in the City and is, therefore, not included in the cumulative project list assumed in the Draft EIR. As described in the Draft EIR, the Simon Property Group submitted an application in 2007 to expand the Stanford Shopping Center and construct a boutique hotel. However, this application was withdrawn in April 2009. Given Stanford University’s statement that it intends to focus its development efforts on the SUMC Project, and due to the current

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economic downturn and changing retail trends, the scope of any future development at the Stanford Shopping Center is too speculative to analyze at this point. As stated by Stanford, the Shopping Center expansion is no longer before the City for its consideration and there are no foreseeable plans, proposals, or programs in place that would bring the Shopping Center expansion back to the City for approval at a later time. Therefore, the Stanford Shopping Center expansion is not considered a probable future project for the purposes of the discussion of cumulative impacts, per CEQA Guidelines Section 15130. Nevertheless, some background growth at the Stanford Shopping Center is included in the City’s regional traffic model.

33.5 The commenter states that Palo Alto needs to allow Sand Hill Road traffic to go through to Alma Street, instead of turning left onto El Camino Real and making a U-turn in Menlo Park to return to Palo Alto. The intersection geometrics and permitted movements at the Sand Hill Road/El Camino Real/Alma Street intersection have been established by the City of Palo Alto. Modifications of these geometrics is not required to reduce the impacts associated with the SUMC Project. Changing the travel patterns through this intersection is not an improvement that is tied to the SUMC Project.

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2 Barbara Schussman, Bingham McCutchen LLP, Letter to Cara Silver, Senior Assistant City Attorney, April 16, 2009.
Minor, Beth

From: Nat Fisher [ukr00c@hotmail.com]
Sent: Tuesday, May 25, 2010 11:35 AM
To: Heiman, Karen
Cc: Council, City; Keene, James
Subject: retention basin on Stanford land

If Stanford is required to provide a public benefit to the City, nothing would be more valuable than the flood retention basin. The City has asked Stanford for one for many years and was always turned down. This may be the opportunity we have been waiting for. Let's seize it.

Natalie Fisher

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The New Busy is not the old busy. Search, chat and email from your inbox. Get started.

5/25/2010
34. Natalie Fisher (letter dated May 25, 2010)

34.1 The commentor states that if Stanford is required to provide a public benefit to the City, then Stanford should provide a flood retention basin. Please refer to Master Response 12 for a discussion of the Development Agreement.

As explained in Impact HWY-4, pages 3.11-37 through 3.11-41 of the Draft EIR, the SUMC Project would have a less-than-significant impact on stormwater runoff and erosion. The SUMC Project would be required to comply with existing regulations and implementation of these requirements would prevent substantial on-site erosion by requiring erosion and sediment controls during construction and operation. In addition, as discussed on page 3.11-41 of the Draft EIR, on-site stormwater detention may be required by the Public Works Department to lessen the SUMC Project’s impact on City storm drains, which would further reduce the less-than-significant runoff and erosion impacts. The SUMC Project sponsors would be required to adhere to the requirements of the Public Works Department.

According to CEQA Guidelines Section 15126.4(a)(3), mitigation measures are not required for impacts that are not found to be significant. Per CEQA Guidelines Section 15126.4(a)(4), mitigation measures must be “roughly proportional” to the impacts of the project. Therefore, since less-than-significant stormwater runoff and erosion impacts would occur under the SUMC Project, and since the suggested retention pond is located away from the SUMC Sites, mitigation measures such as the retention pond are not required under CEQA.
Chapman, Kirsten R

From: M. Fruth [mafruth@yahoo.com]
To: Council, Gty; Menlo Park City Council; mhubson@cityofmenlo.org
Cc: Turner, Steven
Subject: Stanford SUMC Review of the Draft Environmental Report

Mr. Turner, please acknowledge receipt of these comments by return email.

These are my comments about the Draft Environmental Impact Report for the Stanford Hospital Projects. Please respond with positive plans for action. Merely noting public comments is inadequate. Any Stanford University response that does not suggest any viable solutions to the problems identified by any commentator is prima facie insufficient, inadequate, and does not meet the minimum requirements of CEQA.

Stanford University and Stanford University Medical Center are essentially the same entity, since Stanford University Medical Center is subordinate to Stanford University and functions as if it is a tenant, with all of its activities subject to Stanford University approval.

I am amazed that officially it is claimed that there are no impacts, and therefore no mitigations, for East Palo Alto. Impacts in Redwood City and Mountain View were not studied either. Comparing University Avenue, the most direct link between Stanford University Medical Center and Bayfront Expressway, with the high and unavoidable impacts at Willow Road and Bayfront Expressway, this needs explaining and justifying in detail. Willow Road and Bayfront Expressway is already the most dangerous intersection in Menlo Park. Stanford University Medical Center can pay for complete mitigation, not just political "fair share." This will make unavoidable impacts easier to justify politically, and expedite the approval process.

The question is whether to construct new medical facilities, including a full-service community hospital while maintaining a level one trauma center. The question is how to do so in the most productive, proactive way, with Stanford University Medical Center meeting its responsibility to locate all of the funds for all of the necessary mitigations for its project.

For example, it is not clear whether the increases in the sizes of the Emergency Rooms are sufficiently large. Please expand on your analysis and explain how the vague term on page 2-22, "modest overall projected population growth," was estimated, particularly given the different populations served: the surrounding community, the regional patient base, and the worldwide "complex cases."

Please update all timelines. For example, the draft environmental impact report still states that demolition will begin mid-2009 (sic). Stanford should not expect to speed up the process to make up time lost through administrative delays, particularly its own delays. For example, for the record, I did not receive the draft environmental impact report until June 18, 2010, due to misdirection. I did not receive all of the supporting documents, which I requested multiple times, until July 19, 2010. I would also note that Stanford University Medical Center's public relations efforts have been soliciting community input, but welcoming only positive comments.

This appears to be a useful time for Palo Alto and Menlo Park to annex all unincorporated Stanford lands within their respective spheres of influence.

Impacts of traffic, housing, & environmental quality are all co-mingled. See, for example, considering the analysis on page 3.13-2, please mitigate all—100 percentage—of the impacts.

Before accepting and certifying the draft environmental impact report, please locate and allocate all the money needed for mitigations, as required and mandated by the California Environmental Quality Act. If you haven't found the money for mitigations, you don't have a viable project. If Stanford provides all mitigations in full, rather than negotiating about what "fair share" means, this would streamline action on the projects. If Stanford pays for complete mitigation, not just political "fair share," this will make unavoidable impacts easier to justify politically, and expedite the approval process. Stanford should be prepared to pay for full mitigation of all intersections with LOS D or worse, in all locations on the Midpeninsula, notably including Menlo Park and East Palo Alto, not just Palo Alto. The requirements for all mitigations of any kind should be permanently embedded in project approvals.

The draft environmental impact report is too vague about exactly what is considered to be "Stanford University Medical Center uses." The proposed change in Policy L-8 is too broad; a one-time exception to this policy would preserve Palo Alto planning flexibility for the future, instead of creating a zoning change that would apply to all of Palo Alto. Any changes proposed, including the change in Policy L-8, are only defensible if all of the resulting impacts are fully mitigated.

The scoping documents did not address the increase in impacts, particularly the interaction of the right sizing with all impacts.

"Right-sizing" does not preclude more intensive future use. Stanford initially claimed that their one-patient-per-room model would virtually eliminate impacts, but the draft environmental impact report acknowledges that the project objective is "increased space for both medical offices and support services." The draft environmental impact report makes clear that population impacts in all categories studied are significant, so please evaluate all impacts using the current nationwide standards about hospital sizing, and since future flexibility is crucial, please assume maximum density of both patients and employees. As Stanford University Medical Center itself admits in Stanford Medicine News, procedures change every two to three years. Please include terms in the project approval requiring Palo Alto City Council review of any internal changes to more intensive uses.

Since the proposed project is much more dense than the structures it will replace, please explain how & why you allege that the CA Building Code requires additional height and square footage. The proposed increase in density and height can be compensated by the proposed mitigations and by a density transfer from other areas of Stanford land, e.g., some or all of the Stanford land west of 280 could become permanent open space in exchange for increased height & density in hospital area. If permanent, this would also help to meet the Stanford University's responsibility to provide open space and recreational facilities.

It would be nice to preserve the Stone building facade, possibly by relocating it or reconstructing it before the Certificate of Occupancy is issued. This would partially mitigate the cumulative impact to this landmark cultural resource.
Please complete full critical review of all options - both no-project & full build out, evaluating all mitigation measures.

An environmental impact report is a model, not a perfect prediction of reality. To estimate cumulative expanding impacts’ domino effect as precisely as possible, all analyses should evaluate the impacts of all estimated consequential increases in both oncampus populations, and also consequent collateral increases in surrounding communities’ populations. Increases in economic activity due to this project will increase impacts, and therefore necessitate additional mitigations.

Please include cumulative impacts of full buildout of all existing zoning. Also, other offsite projects considered under cumulative impacts should include all projects in progress, both on Stanford lands and in Palo Alto, East Palo Alto, Menlo Park, and Mountain View. The Bohannon project is an example; by late November, 2010, we should know whether that project will be built.

The draft Environmental Impact Report does not mention buses other than Marguerite, the AC Transit U Line, and VTA Community bus lines. Shuttle buses services to be enhanced include the Menlo Park shuttle as well as the Palo Alto shuttle. In addition to the mitigations identified in the draft Environmental Impact Report, employees’ transit mitigations should include free bus passes for all employees on any public transit routes, including, but not limited to, bus passes on Sam Trans and VTA, not just Community bus lines. Marguerite and/or guaranteed ride home could be expanded to all shifts.

Your traffic impact numbers should reflect the fact that parttime employees usually generate as many trips as fulltime.

The impact of patient trips can be provided through the same mitigations as for employees above.

Please define parking which would be “performance based” and would meet projected needs,” as reported on page 2-25. Implementation of all traffic mitigations may reduce the need for parking, but the approximately fourteen hundred spaces saved should be placed in landscaped parking reserve, not just eliminated.

Please provide full funding for all traffic mitigations, including those listed in TABLE 3.4-18 and on page 3.4-62.

The planning described on page 2-49 may reduce ambulance runs, which is important given the overlapping routes from East Palo Alto, east Menlo Park, and eastern Redwood City. Increases in ambulance services & costs of improving ambulance routes should be paid for in full rather than any by negotiating any “Fair Share.” Complete ambulance routes need to be studied, not just those in Palo Alto and Stanford University. If one relies on Figures 3.7-6 and 3.7-7, one might conclude that no ambulances arrive through San Mateo County. Opticom traffic signals are insufficient mitigation, particularly when based on only part of the impacted area.

The traffic estimates for El Camino Real/Sand Hill Road/Alma intersection seem low, especially during peak use/commute hours. In particular, please explain how the ambulance route from North Palo Alto to the new Emergency Room will be direct enough and the quickest possible, without traveling around the block nor making any U-turns. Ambulances cannot travel from Alma Street into Menlo Park and make a U-turn at Cambridge; therefore the traffic island at the El Camino/Sand Hill/Alma must be removed and full four-way traffic allowed with no restrictions on four-way traffic flow at this intersection. Ideal ambulance routing needs two routes to the same hospital. If the University Avenue/El Camino intersection is blocked by flood or an accident, especially the underpass, the Sand Hill/Alma/El Camino intersection becomes crucial for emergency access. Please clarify and explain all secondary ambulance routes, particularly since the government standard requires at least two independent routes. The inadequate emergency access must be fully mitigated.

Similarly, please add add 101 from Marsh to Woodside Road to your analysis and to Table 3.4-23.

In addition to evaluating the impacts of adding new Stanford University Medical Center employees, please review related consequential impacts, including, but not limited to, impacts on community services and on schools. Please include the impact and review of population increases.

I disagree with the conclusions that housing impacts would be less than significant, and that no additional housing is needed. The draft Environmental Impact Report admits that this deficiency contributes to other environmental impacts, but proposes no effective remedy. The proposed $200/housing fee is incredibly insufficient to meet the need for non-exempt housing; instead of twenty-six percent, Stanford should fund one hundred percent of the increase in housing demand it will cause. Please evaluate the financial impact of meeting actual needs without any taxpayer subsidies. The dedicated housing can be met by an increase in oncampus housing stock.

I agree that it’s a good idea that four hundred ninety previously approved, below market rate units be dedicated to Stanford University Medical Center employees including current employees and new hires.

Please fully locate land near Lucille Packard Children’s Hospital, construction funds and operating funds to meet the full need for McDonald Houses, including the currently existing shortage.

Meeting the housing need and consequent Palo Alto Unified School District needs will make it easier to recruit qualified staff, notably addressing the shortage of nurses.

Any Stanford University Medical Center response that does not suggest any viable solutions to the problems identified by any commentator is prima facie insufficient. Therefore, currently this draft environmental impact report is deficient, inadequate, and does not meet the minimum requirements of CEQA. Most of the impacts described in Chapter 4 can be mitigated. If Stanford University Medical Center provides complete mitigation, not just political “fair share,” this will make unavoidable impacts easier to justify politically, and expedite the approval process. All of the proposed mitigations will reduce or eliminate the need for a Statement of Overriding Considerations, and complete mitigation would qualify as partial justification for any Statement of Overriding Considerations, and could reduce Stanford University’s liability for the consequences of traffic congestion. If all of the proposed mitigations are completed, there may be no need for a Statement of Overriding Considerations. Please evaluate the financial impact of meeting actual needs without any taxpayer subsidies. Full mitigation could be considered to be a “public benefit.”

All mitigations should have specific deadlines for completion, preferably before any Certificates of Occupancy are issued.

Respectfully submitted,
Margaret Fruth
Margaret Fruth (letter dated August 26, 2010)

35.1 The commentor makes the statement that the City must provide responses to any and all comments received and requests responses be provided to her comments. Please see Responses 35.2 through 35.31, below, in response to the commentor’s specific questions and concerns.

35.2 The commentor states that Stanford University and the Stanford University Medical Center are the same entity. This statement is incorrect. SHC and LPCH are nonprofit corporations. While they are owned by Stanford University, they are separate legal entities with their own Boards of Directors, budgets, and corporate documents. The Stanford School of Medicine, by contrast, is part of Stanford University. The “SUMC” is a location, not an entity.

35.3 The commentor is surprised at the results of the intersection impact analysis in East Palo Alto, Redwood City, and Mountain View, and believes that the SUMC Project should pay for full mitigation at the Willow Road/Bayfront Expressway intersection, not just fair share. The Transportation Impact Analysis assessed the traffic operations of several intersections on University Avenue through East Palo Alto. Although traffic congestion currently occurs on University Avenue, the addition of SUMC Project traffic would not cause a significant impact according to the established thresholds.

The study area included 66 intersections in Menlo Park, Palo Alto, East Palo Alto, and portions of unincorporated San Mateo County. The study area captured the impact of the SUMC Project on local intersections and adjacent freeways. Any project traffic on streets within Redwood City or Mountain View would be locally generated and would not cause degradation in traffic operations.

The Transportation Impact Analysis assessed the traffic operations at the Willow Road/Bayfront Expressway intersection and found that the SUMC Project caused a significant transportation impact. However, SUMC Project impacts would be mitigated to less than significant through a payment of a fair share contribution based on the amount of project traffic in relation to the amount of growth in traffic over existing levels.

35.4 The commentor indicates that the SUMC Project sponsors should construct and operate the SUMC Project in a productive way and meet its responsibility to fund identified mitigation measures. As outlined throughout the Draft EIR, mitigation measures are identified to reduce impacts that are deemed to be significant. Table S-4 in the Summary Section of the Draft EIR lists all the mitigation measures that would need to be implemented during construction and operation of the SUMC Project.
As explained in the Introduction Section on page 1-5 of the Draft EIR, if the SUMC Project is approved, then the City of Palo Alto must adopt a Mitigation Monitoring and Reporting Program (MMRP), which would ensure that the mitigation measures presented in the Draft EIR are implemented. Additionally, the Conditions of Approval would identify payment responsibility for required mitigation measures. The SUMC Project sponsors would be required to fund all mitigation measures, as identified in the Conditions of Approval, which would be developed during the approval stage of the SUMC Project process. In addition, as part of the SUMC Project, a Development Agreement is proposed that would outline funds and specific fees that the SUMC Project sponsors would be required to pay. As such, before approval of the SUMC Project, the City and the SUMC Project sponsors would determine specific mitigation and Development Agreement payment responsibilities. Please see Master Response 11 for a description of an MMRP, Conditions of Approval, and the Development Agreement and how these would be implemented during the SUMC Project review and approval process.

35.5 The commenter requests to know the increase in size of the Emergency Department (ED) under the SUMC Project. As stated on pages S-22 and 2-49 of the Draft EIR, Summary and Project Description respectively, the ED would be expanded from 11,700 square feet to 47,892 square feet and the number of treatment spaces would increase from 38 to 51. The 36,192-square-foot increase in ED size includes 25,000 square feet of “right-sizing” or decompression space, which refers to expanded floor area to serve as treatment space. The right-sizing or decompression trend is typically seen in modernizing hospitals as modern treatment standards require increased floor area per bed or treatment space, compared to older hospital facilities. As such, only 11,192 square feet of the ED expansion would be associated with an increased level of operations. Based on this increase in size and treatment spaces, SUMC anticipates annual ED visits would increase from the current 42,522 (116 per day) to 61,200 (168 per day) by 2015 and to 72,675 (199 per day) by full occupancy of the hospitals in 2025.

The commenter also questions how the term “modest overall projected population growth” was estimated, as used on page 2-22 of the Draft EIR. The projected growth of SUMC patients is shown in Table 2-8 on page 2-47 of the Draft EIR, which projects the number of annual patient visits at the SHC and the LPCH (no patient activity is induced by SoM research/laboratory functions). These estimates are based on current market trends, specific data collected from competing modern healthcare institutions, and knowledge of delivery of complex care. As shown in Table 2-8, annual SHC outpatient visits would increase from 403,885 to 470,923 at 2015 (an increase of 67,038) and to 572,949 at 2025 (an additional increase of 102,026). Annual LPCH outpatient visits would increase from 107,363 to 138,893 in 2015 (an increase of 31,530) and to 153,349 at 2025 (an additional increase of 14,456). In total, the SUMC Project would increase annual outpatient visits by 215,050 upon full occupancy at 2025. The proposed increase in ED functions and
The commenter questions the SUMC Project construction schedule as outlined in Section 2, Project Description, of the Draft EIR. As noted on page 2-53, the mid-2009 approval date for the SUMC Project serves as a conservative assumption to ensure that mitigation would be in place when warranted and not at a later date. Although the Draft EIR was published in May 2010, after the assumed approval date, this date was retained in order to guarantee that the mitigation measures would be implemented during construction. As such, the construction timeline as outlined in Section 2 of the Draft EIR will remain as is and the analysis in the Draft EIR remains adequate for the purposes of CEQA.

The commenter states that she did not receive requested Draft EIR information until a later date. The Draft EIR and the associated appendices have been available online on the City’s website (www.cityofpaloalto.org/sumc) since publication of the Draft EIR on May 20, 2010. In addition, the Draft EIR is available at the Palo Alto Main Library, the City of Palo Alto’s Development Center, and City Hall at the Department of Planning and Community Environment. As such, the materials related to the SUMC Project Draft EIR were available to the public and the City accepted comments until July 27, 2010. The City extended the required 45 day review period to a 60+ day public review period through July 27, 2010, for a total of 69 days. The public had adequate time to review and comment on the Draft EIR and all associated documentation.

In addition, the commenter claims that the SUMC public relations team welcomes only positive feedback. During the Draft EIR public review period, several public hearings were held for individuals to express their comments and concerns about the SUMC Project and the Draft EIR. The public review period included six Planning and Transportation Commission (Commission) hearings, six City Council hearings, one Architectural Review Board hearing, and one Historic Resources Board hearing. The Commission and City Council hearings were open to the public and individuals were invited to voice their opinions on the SUMC Project and the Draft EIR. In addition to the public hearings, members of the public were encouraged to submit written comments. As demonstrated in this document, comments received on the SUMC Project and Draft EIR reflect both positive and negative opinions on the SUMC Project.

The commenter states that the cities of Palo Alto and Menlo Park should annex all unincorporated Stanford lands within their respective spheres of influence. As explained in Section 2 of the Draft EIR, Project Description, the SUMC Project proposes City of Palo Alto annexation of a 0.75 acre parcel of land adjacent to the Main SUMC Site in order to expand the SoM buildings into this area. However, the annexation of other Stanford lands is not proposed under the SUMC Project. Therefore, this comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA.
The commentor requests that all traffic, housing, and environmental quality impacts be mitigated. Please see Master Response 7 regarding Mitigation Measure PH-3.1. Also, it should be noted that it is not the intent of CEQA to mitigate 100 percent of impacts; rather, CEQA requires mitigation for impacts that are determined to be significant, based on the significance criteria established by the lead agency. Per CEQA Guidelines 15126.4, mitigation measures are not required for effects which are not found to be significant. Where an EIR concludes that it is not feasible to mitigate a particular impact, CEQA allows the project to nonetheless be approved if the lead agency adopts a statement of overriding considerations explaining what considerations warrant approval of the project notwithstanding its significant and unavoidable impacts.

The commentor requests that the SUMC Project sponsors ensure that any funding requirements to implement specific mitigation measures be determined and assigned prior to SUMC Project approval. Please refer to Response 35.4, above.

The commentor states that the term “Stanford University Medical Center uses” is not specific. This exact term is not applied in the Draft EIR. However, page 2-22 of the Draft EIR explains, “the hospitals propose approximately 60,000 square feet of medical office/clinics for community practitioners and SUMC uses at the Hoover Pavilion Site.” In this reference, “SUMC uses” is meant to include clinic and medical office uses by the SUMC, which exclude the community practitioners that are not affiliated with the SUMC. This can be inferred by the information provided in the Project Description; therefore, no changes will be made to the Draft EIR. Other than this one use, the terms “Stanford University Medical Center uses” or “SUMC uses” are not applied in the Draft EIR.

The commentor also states that the proposed changes in Policy L-8 of the Comprehensive Plan are too broad. All land uses proposed under the SUMC Project are provided in Section 2, Project Description, of the Draft EIR. The change to Policy L-8 is a clarification that this policy was not intended to limit growth of hospital, clinic, and research uses. The City planning staff has concluded this based on review of the legislative history.

Considering the changes made in Sections 3 and 6 of this document, the SUMC Project would result in significant and unavoidable impacts related to traffic generation, emission of criteria air pollutants, construction noise, ambulance noise, demolition of the historical 1959 Hospital Building complex, and removal of Protected Trees. The City may approve the proposed changes to Policy L-8, as well as all components of the SUMC Project, even with its significant and unavoidable impacts. As indicated in pages 1-5 and 1-6 of the Draft EIR, if the City of Palo Alto decides to approve the SUMC Project, and if the SUMC Project would result in significant impacts that cannot be mitigated to less-than-significant levels, then the City must indicate that any such unavoidable significant impacts are acceptable due to overriding considerations as described in CEQA Guidelines Section
15093. This is known as a “Statement of Overriding Considerations.” In preparing this statement, CEQA requires the City to balance the benefits of the SUMC Project against its unavoidable environmental effects. If the City finds that the benefits of the SUMC Project being considered outweigh the project’s unavoidable adverse environmental effects, then the adverse environmental effects may be considered acceptable (CEQA Guidelines Section 15093).

35.12 The commentor states that the scoping documents did not address the increase in impact, particularly the impacts associated with right-sizing. This EIR, including the Draft EIR, addresses environmental impacts of the SUMC Project in its entirety, as defined in Section 2 of the Draft EIR. As described on page 2-44 of the Draft EIR, right-sizing refers to increasing floor area per inpatient bed or service without substantially increasing the number of patients or employees. Right-sizing is a trend that many hospitals undergo to conform to modern healthcare standards. Approximately 34 percent of the building program would be attributable to right-sizing, and 66 percent would be attributable to increased operations. This EIR addresses impacts of increased space due to both right-sizing and increased operations.

As indicated in Section 3.13, Population and housing, of the Draft EIR, there would be no significant impacts related to direct or indirect population growth. The Draft EIR does identify an adverse impact on the City’s jobs to employed residents ratio, but this impact is not labeled as a significant impact under CEQA.

The commentor also asks that the City Council require its approval for changes in medical procedures that would result in more intensive uses. From a land use perspective, hospital uses are considered as a whole. The City does not weigh in on the individual procedures performed inside the hospitals.

35.13 The commentor questions why the SUMC Project would need additional height and square footage. This comment pertains to the design of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

The following is a description of the SHC Hospital tower height, as explained by the SUMC Project sponsors. The Building Code itself does not specify the height or square footage of hospitals; these details are dictated by the hospital program envisioned by the SUMC Project sponsors in order to meet the future demands. The SHC Hospital building would need to be built vertically for efficiency purposes, thereby requiring the building heights as proposed. The upright alignment of the new SHC Hospital building would allow for vertical circulation in the form of elevators, rather than requiring patients to move through lengthy public corridors. The immediate adjacency between the floors would organize patient movement privately and safely in the most efficient way possible through
vertical transportation.\textsuperscript{1} In addition, Building Code ventilation and structural requirements result in a greater floor-to-floor height for a hospital than a commercial office building. The typical floor-to-floor height of an office building is 10-12 feet, while in a modern hospital it is 16-20 feet.\textsuperscript{2} As such, the height of the SHC Hospital building is necessary for the functionality of the hospital.

As outlined on page 3.3-39, Mitigation Measure VQ-2.1 would be implemented to reduce the impacts to visual character and quality at the SUMC Sites. This mitigation measure would require the SUMC Project sponsors to adhere to the City’s Architectural Review process and would reduce the impacts to less than significant.

In addition to the height increases, the SUMC Project would require an expansion of square footage. As explained on page 2-22 in Section 2, Project Description of the Draft EIR, the SUMC Project requires additional floor area over what is currently at the SUMC Sites due to existing spatial constraints and the growing demand for outpatient services. Current spatial constraints at the SHC and LPCH restrict the SUMC’s ability to serve new patients and expansions needed to provide the optimal level of care for existing patients. At both hospitals, the number of patients turned away will increase unless additional patient beds are provided. In addition, the hospitals need to expand because the American Academy of Healthcare Architects recommends that all beds be in private rooms, which require right-sizing under the SUMC Project. With regards to outpatient services, in order to accommodate the growing demand, the hospitals propose to construct new and replacement clinics on the Main SUMC Site, as well as renovate the existing Hoover Pavilion building and construct a new building for use as clinics and medical offices.

The commentor also requests open space dedication as a way to mitigate the height and bulk increases. As stated on page 3.14-9 of the Draft EIR, Public Services, the SUMC Project proposes to expand the existing open space at the SUMC Sites. The expanded open spaces would include walkways, open plazas, and landscaped areas for employees, patients, and visitors. The SUMC Project would also incorporate new sections of open spaces and small grass fields, increasing pervious surfaces by 23 percent over existing conditions. Several of these proposed open spaces would be visible from public areas, such as the landscaped gateway at the corner of Welch Road/Quarry Road, the LPCH/Shopping Center connection along Welch Road, the Hoover Pavilion entry lawn, and the refurbished Pasteur Mall. In addition, the SUMC Project sponsors would provide access to Stanford University’s fields for SUMC employees. This access would offset the potential deterioration new SUMC employees could cause on City parks. Therefore, even

\begin{footnotesize}
\footnote{\textsuperscript{1} Mark Tortorich, Vice President of Facilities Planning, Design and Construction for Stanford University Medical Center and Lucile Packard Children’s Hospital, City Council Hearing, June 14, 2010.}
\footnote{\textsuperscript{2} Stanford University Medical Center, “Guide to Key Community Issues for the Stanford University Medical Center Renewal Project,” June 2010, accessed on October 14, 2010 at: http://www.stanfordpackard.org/sites/default/files/pdfs/report_0610.pdf}
\end{footnotesize}
though the SUMC Project would increase height and bulk at the SUMC Sites, additional open space would be included and access to other open space areas would be available.

Similarly, there is no need for a density transfer from other Stanford land. The land west of I-280 does not have entitlements for building square footage that could be transferred to the SUMC Sites, even if such a transfer were desirable.

35.14

*The comment expresses a preference to preserve the façade of the Stone Building complex.*

At this time, the SUMC Project sponsors do not anticipate using portions of the Stone Building complex façade in the design of the new buildings. If any part of the Stone Building complex were retained, it would have to be physically separated from the remaining hospital buildings in order to comply with the requirements of Office of Statewide Health Planning and Development (OSHPD). This would necessitate demolition of the 1973 Core Expansion Building and separation of utility systems. In addition, any portion of the Stone Building complex that would remain in place would need to undergo substantial seismic retrofit work because the buildings in the Stone Building complex do not meet current standards for fire separations, air exchange, and ventilation. Upgrading these systems would require duct work that would reduce available interior space, diminishing the functionality of the interior space.³

In addition to the functional obstacles, preservation of a portion of the Stone Building complex would not substantially reduce the effect on historic resources caused by demolishing the rest of the building complex. CEQA Guidelines Section 15064.5(b)(2) states that the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register of Historic Resources (CRHR). The primary façade of the Stone Building complex faces the main entry and its fountain plaza on Pasteur Drive. Three sections of the Stone Building Complex are visible from the Pasteur Drive entry: the Boswell, Edwards, and West Pavilion buildings. This represents about 1,050 linear feet of façade and the complex as a whole has approximately 3,000 linear feet of unobstructed façade. Even if one of the buildings facing the front entry, the West Pavilion, were preserved and re-used, the Stone Building complex would no longer retain sufficient physical characteristics to justify its eligibility for the CRHR.

Re-use of the West Pavilion would preserve approximately 560 linear feet (18.6 percent) of the total façade for the Stone Building complex façade, only 325 feet (10.8 percent) of which would be visible from Pasteur Drive. While retaining the West Pavilion would preserve some of the architectural features of the building, the scale and proportion would be severely compromised and, at less than 20 percent of the original complex and less than

a third of the front façade, the surviving element would not retain enough integrity to qualify as a historic resource. In addition, the West Pavilion displays some incompatible rooftop additions and lacks the interior courtyard that is one of the essential features of the Stone Building complex. Accordingly, preservation of the West Pavilion would not avoid or substantially lessen the significant effects of the SUMC Project and, therefore, it is not analyzed in the Draft EIR.

Mitigation Measures CR-1.2 through CR-1.4, as presented on pages 3.8-22 through 3.8-23 of the Draft EIR, would be required as part of the SUMC Project. Mitigation Measure CR-1.2 would require HABS documentation with site-specific history, accurate mapping of all buildings, architecture descriptions, and photographic documentation. As included in Mitigation Measure CR-1.3, all written and photographic documentation regarding the Stone Building complex would be submitted to applicable agencies. In addition, Mitigation Measure CR-1.4 requires the SUMC Project sponsors to install interpretive displays within the SUMC Sites that provide information to visitors and residents regarding the history of the Stone Building complex. The displays, signs, and/or plaques would be installed in highly visible areas. Therefore, although the SUMC Project would require the demolition of the Stone Building complex, these mitigation measures would lessen the significant and unavoidable impacts associated with the loss of this historic structure.

35.15 The commentor requests a review of the full build-out of the SUMC Project and a review of forgoing development or No Project Alternatives. A discussion and analysis of the SUMC Project full build-out is included in Section 3 of the Draft EIR. Please refer to Sections 3.2 through 3.15 for a complete analysis of the anticipated SUMC Project impacts associated with full project buildout. In addition, Section 5 of the Draft EIR, Alternatives, provides an analysis of seven alternatives, including two No Project and two Reduced Intensity Alternatives. In addition, please refer to Master Response 8 for a discussion of the full range of alternatives analyzed in the Draft EIR.

35.16 The commentor describes an approach to an analysis of cumulative impacts. Each cumulative analysis throughout Section 3, Environmental Analysis, of the Draft EIR provides the definition of the geographic context of each resource being addressed in the cumulative scenario. Per CEQA Guidelines Section 15130(b)(3), lead agencies should define the geographic scope (or context) of the area being affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used. The geographic contexts for this analysis have been tailored to the location of the resources or populations that would experience a cumulative impact from the SUMC Project as well as other foreseeable development. For example, for cumulative emissions of criteria air pollutants, the geographic context includes the entire, nine-county San Francisco Bay Area Air Basin. For cumulative impacts on archaeological resources, the geographic context includes the

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4 Stanford University Medical Center, correspondence with PBS&J, October 12, 2010.
300-foot archaeologically sensitive zone along San Francisquito Creek, which comprises a geographically distinct cluster of resources. This approach is appropriate under CEQA.

Section 4.3, Growth-Inducing Impacts, of the Draft EIR addresses the ways in which the SUMC Project could foster economic growth, either directly or indirectly, in the surrounding environment. As explained on page 4-3 of the Draft EIR, in accordance with the CEQA Guidelines Section 15126.2, this discussion of growth inducement is not intended to characterize growth induced by the SUMC Project as necessarily beneficial, detrimental, or of little significance to the environment. The growth inducement discussion is provided for informational purposes so that the public and local decision-makers have an appreciation of the potential long-term growth implications of the SUMC Project. As such, no mitigation measures for increased economic growth are warranted.

35.17 The commentor requests the inclusion of all future projects within the City of Palo Alto and neighboring jurisdictions in the cumulative analysis of the SUMC Project. Per CEQA Guidelines Section 15355, cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental effects. According to CEQA Guidelines Section 15130(b)(3), “Lead agencies should define the geographic scope [or context] of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used.” The geographic context is typically tailored to the nature of the environmental issue/impact and resource or population being affected. Each discussion of cumulative impacts in Sections 3.2 through 3.15 of the Draft EIR includes an explanation of the relevant geographic context. Depending on the topic, the geographic context could be localized or regional. For example, the cumulative context for air quality would include the larger regional air basin.

As stated on page 3.1-2 of the Draft EIR, CEQA Guidelines Section 15130(b)(A) requires that an EIR’s analysis of cumulative impacts should be based on either a list of past, present, and probable future projects producing related impacts or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document. The cumulative projects analyzed in the Draft EIR rely on both a list of projects within Palo Alto and regional growth projections. The list of foreseeable projects within the City of Palo Alto was provided by City staff and included in the analysis (see Appendix B to the Draft EIR). Growth projections applied to the cumulative analysis in the Draft EIR and include forecasted growth in adjacent cities other than Palo Alto. Growth projections also include growth allowed by the Stanford University 2000 Community Plan and General Use Permit (CP/GUP), the Association of Bay Area Governments (ABAG) Projections 2005, the Bay Area Air Quality Management District’s (BAAQMD) air quality projections, the City of Palo Alto’s Travel Demand Forecasting Model, and projections of various public service and utility providers for the SUMC Project.
Please refer to Master Response 3 for a discussion on background growth and cumulative traffic impacts.

35.18 The commentator states that the Draft EIR only mentions Marguerite shuttles, Alameda-Contra Costa Transit District (AC Transit), U Line, and Santa Clara Valley Transportation Authority (VTA) Community buses, and does not account for all shuttles in the area. Additionally, the commentator states transportation mitigations should expand transit benefits. The Transportation Impact Analysis evaluated all public transit routes that serve the area in proximity to the SUMC Project including regular VTA and SamTrans service. It also included Menlo Park and Palo Alto shuttles and contained mitigation measures to improve those services. Consideration was given to provide a Clipper transit pass to all SUMC employees which allows travel on most transit routes, but it was determined that GO Passes provide a more cost effective means of traffic mitigation, and combined with other measures mitigate all SUMC Project intersection impacts. The SUMC transportation demand management (TDM) Program includes a guaranteed ride home regardless of shift. Please refer to Master Response 2 for a discussion of other TDM measures.

35.19 The commentator states that the traffic impact numbers should reflect the fact that part-time employees usually generate as many trips as full time. The Transportation Impact Analysis for the SUMC Project based trip generation on project-specific data. The amount of traffic generated by the existing facilities was measured and future traffic volumes were expanded based on the expansion of the facilities. Existing part-time employee trip generating characteristics were captured in the existing data collection and were expanded in relation to the SUMC Project.

35.20 The commentator requests that the impact of patient trips be expanded. SUMC Project trip generation was based on project-specific data. All existing patient trip generation was captured in the data collection and these values were expanded to reflect the future patient traffic volumes. The growth in patient traffic has been accurately represented in the Transportation Impact Analysis.

35.21 The commentator requests clarification on which parking would be “Performance Based Parking,” as shown on page 2-25 and requests that reduced spaces be placed in a landscape reserve and not eliminated. As described in Master Response 11, the SUMC Project would conflict with existing development restrictions in the existing Public Facilities (PF zoning district). Therefore, the project approval would include creation of a new zoning district. The SUMC Project sponsors have proposed "performance-based parking" as the parking requirement in the new district, rather than a parking requirement based on square footage or number of housing units, as traditionally occurs in zoning regulations. Parking would be provided to meet projected needs, with consideration given to the potential for reduced parking demand due to the proximity of the Palo Alto Intermodal Transit Station (PAITS) and demonstrated effective TDM programs. The
performance-based parking requirements would be established by the applicable conditional use permit. The SUMC Project sponsors have proposed parking spaces for employees, patients, and visitors, with consideration to the possible utilization of PAITS and other TDM programs.

35.22 The commenter asks that full funding be required for all traffic mitigations, including those listed in Table 3.4-18 and on page 3.4-62. Please refer to Master Response 6 for fair share calculations.

35.23 The commenter states that any improvements to ambulance service should be paid in full by the project and modifications should be made to the El Camino Real/Sand Hill Road/Alma Street intersection to allow travel across El Camino Real for emergency access. The information provided on page 2-49 of the Draft EIR states that the SUMC Project sponsors estimate that ambulance trips would increase from the current total of 8,331 trips (23 per day) to 11,995 trips (33 per day) by 2015 and 14,244 trips (39 per day) by full occupancy of the hospitals in 2025. Figure 3.7-6 shows existing ambulance routes and Figure 3.7-7 shows ambulance routes with the SUMC Project. Ambulance trips from San Mateo County traveling down I-280 would use Sand Hill Road today and with the SUMC Project to access the emergency room. Ambulance trips from San Mateo County traveling on El Camino Real or US 101 would use Quarry Road today and Sand Hill Road with the SUMC Project. The roadway network surrounding the SUMC is a grid network which allows ambulances several options to access the emergency room if one specific route is blocked. The proposed ambulance routes shown on Figure 3.7-9 of the Draft EIR are the preferred routes which will be used most of the time. However, variations on these routes are available and will be used as necessary.

The SUMC Project is required by Mitigation Measure TR-9.1 to pay a fair share contribution to the installation of Opticom traffic signal sensors at all intersections significantly impacted by the project even if through other mitigation measures these intersections are fully mitigated. There is not a nexus to expand this mitigation measure to other intersections or to require more than a "fair share" contribution from the SUMC Project sponsors. The traffic volumes for El Camino Real/Sand Hill Road/Alma Street intersection reflect the expected 2025 condition without the project and the 2025 condition with the project. The City of Palo Alto has designed the El Camino Real/Sand Hill Road/Alma Street intersection to prohibit east/west travel to/from Sand Hill Road and Alma Street. An ambulance from North Palo Alto to the emergency room could either turn right at Alma Street and travel up El Camino Real and make a U-turn at Cambridge Avenue, a right turn onto Sand Hill Road, and a left on Durand to reach the emergency room or alternatively turn left on Alma Street, travel through the University Avenue/Alma Street interchange, turn right onto El Camino Real, turn left onto Sand Hill Road, and turn left onto Durand to reach the emergency room.
The commentor requests that US 101 from Marsh Road to Woodside Road be included in the analysis and included in Table 3.4-23. The following freeway analysis, included in Table 4-5, below, indicates that the project trips would be less than one percent of the segment capacity and would not significantly impact the US 101 segment.

<table>
<thead>
<tr>
<th>US 101 Segment</th>
<th>Direction</th>
<th># of Mixed Lanes</th>
<th>Peak Hour</th>
<th>Total Capacity</th>
<th>Total Project Trips</th>
<th>Project Trips with HOV Adjusted</th>
<th>Percent Capacity Added with HOV Adjusted</th>
</tr>
</thead>
<tbody>
<tr>
<td>Marsh Road to Woodside Road</td>
<td>NB</td>
<td>4</td>
<td>AM</td>
<td>9,200</td>
<td>21</td>
<td>17</td>
<td>0.18 percent</td>
</tr>
<tr>
<td>Woodside Road to Marsh Road</td>
<td>SB</td>
<td>3</td>
<td>PM</td>
<td>6,900</td>
<td>65</td>
<td>49</td>
<td>0.53 percent</td>
</tr>
</tbody>
</table>


The commentor requests the Draft EIR to include an impact analysis of the increase in employees under the SUMC Project in relation to community services, schools, and population. Section 3.14 of the Draft EIR, Public Services, addresses the potential environmental effects of the SUMC Project on public services, including police and fire protection, schools, and parks and recreational services. As discussed in the Public Services section, an increase in demand for public services due to employment and/or population increases could lead to potentially significant environmental impacts only if construction or expansion of a new facility would be triggered and the construction or operation of the new facility might adversely affect the physical environment. Therefore, increases in public service demand alone do not constitute a significant environmental effect. As determined in the impact analysis in the Draft EIR, employment increases under the SUMC Project would result in less-than-significant impacts on public services.

Section 3.13 of the Draft EIR, Population and Housing, documents current and forecasted population, housing, and employment statistics in the Bay Area region and City of Palo Alto, and estimates how the SUMC Project would fit within or exceed the current and forecasted statistics. As concluded in this section, the SUMC Project would result in less-than-significant impacts related to population and housing.

The commentor disagrees with the impact conclusions in the Population and Housing Section of the Draft EIR. Impact PH-1 in Section 3.13, Population and Housing, of the Draft EIR indicates that the SUMC Project would result in indirect additional housing demand within the region. However, as shown in Table 3.13-8, the additional housing demand would be within projected housing growth for each community within the region. As such, impacts would be less than significant. The data in Table 3.13-8 are based on...
historical evidence, comprised of SUMC’s data on the residential distribution of their employees. As indicated on page 3.13-11 of the Draft EIR, the distribution of where SUMC Project employees would live is based on existing SUMC employee zip code data provided by the SUMC Project sponsors (see Appendix L of the Draft EIR).\(^5\) Per CEQA Guidelines Section 15126.4(3), mitigation measures are not required for effects which are not found to be significant. Also, fiscal implications of the indirect housing demand are not environmental impacts that require discussion under CEQA. Please see Master Response 10 for a discussion of non-CEQA issues.

35.27 The commentor expresses support for the construction of 490 housing units to be dedicated to SUMC Project employees. It is important to note that the SUMC Project does not propose the construction of these housing units. Rather, these housing units are evaluated as an alternative to the SUMC Project, the Village Concept Alternative. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

35.28 The commentor requests that the SUMC Project sponsors locate land near the LPCH to meet the needs of the Ronald McDonald House. The SUMC Project does not include additions to or expansions of the Ronald McDonald House, which provides temporary housing for families of children needing medical care at little or no cost. The Ronald McDonald House is a not-for-profit entity that is separate from the SUMC Project. This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please see Master Response 10 for a description of non-CEQA issues.

35.29 The commentor states that meeting the housing need and Palo Alto Unified School District needs would make it easier to recruit qualified staff at the SUMC. This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please see Master Response 10 for a discussion of non-CEQA issues.

35.30 The commentor states that the Draft EIR is insufficient because it does not suggest viable solutions to the significant and unavoidable impacts identified for the SUMC Project. The Draft EIR identifies feasible mitigation measures to reduce the significant impacts of the SUMC Project. Some of the impacts can be reduced to less than significant with the implementation of mitigation measures; however, several impacts cannot be reduced to a less-than-significant level with feasible mitigation. Refer to Table S-4 in the Draft EIR for a summary of the SUMC Project impacts and the proposed mitigation measures.

The Draft EIR describes and analyzes the SUMC Project as proposed by the SUMC Project sponsors in the SUMC Project Application from 2007 and last amended in March 2010. The main analysis in the Draft EIR, as described in Section 3, does not propose

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\(^5\) Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Figure 5-5.
alternative site plans that could reduce the significant and unavoidable impacts. However, per CEQA Guidelines Section 15126.6, an EIR must include a range of feasible alternatives that obtains most of the project objectives and reduces the impacts of the proposed project. The Draft EIR addresses a reasonable range of SUMC Project alternatives in Section 5, Alternatives, which analyzes seven different alternatives to the SUMC Project that seek to avoid or lesson the severity of the significant and unavoidable impacts identified in the analysis of the SUMC Project.

The Palo Alto City Council must ultimately certify that it has reviewed and considered the information in the EIR and that the EIR has been completed in conformity with CEQA. Following certification, it is at the discretion of the City Council whether to deny the SUMC Project, or to approve the SUMC Project as proposed, or portions of the proposed SUMC Project alternatives that would mitigate or avoid significant environmental impacts, while rejecting the alternatives that are deemed to be infeasible. Nonetheless, if it is determined that any impacts would be significant and unavoidable, a Statement of Overriding Considerations would be prepared. Please refer to Master Response 11 for a description of the SUMC Project review process for more details.

35.31 The commentor requests that all mitigation measures have specific deadlines. Deadlines for the mitigation measures required under the SUMC Project would be outlined in the MMRP. Please refer to Response 35.4 for more specifics regarding the MMRP.
PTC mtg. 6/24/10

Michael Griffin, 344 Poe Street, Palo Alto

I have several questions concerning the adequacy of the Medical Center DEIR,
relating to traffic impacts:

1) While the DEIR acknowledges Stanford knows the home location of all its
employees by zip code, there appears to be no attempt to correlate that
data with the development of the project’s TDM scheme. The TDM
proposal is Caltrain centric, which will help employees living in a city served
by Caltrain. Why then is there not a similar solution for east bay employees,
to encourage and financially assist them in riding BART, and then U Line and
Dumbarton Express busses?

2) Why is there no analysis on the probability that Caltrain can and will have
the wherewithal to deliver sufficient new capacity making the GoPass
solution a valid one, producing the mitigations promised in the DEIR? Will
there in fact even BE a Caltrain when we need it? And, considering the
uncertainty, why then is there no discussion of a back-up plan should
Caltrain, for whatever reason, be unable to perform its role as the primary
service provider for making a reality of the TDM scheme, with its reliance
on the GoPass?

3) The Trip Distribution map on pg 3-4-48 shows that the vast majority of
regional traffic attempts to access the Stanford projects from the East,
basically exiting off 101 and then sifting westward through the
neighborhoods until finally reaching Stanford. Why doesn’t the DEIR
analyze methods of incentivizing motorists to access Stanford off 280 in the
West? Why was there no discussion of encouraging this western access,
thereby avoiding traffic impacts throughout Palo Alto between 101 and El
Camino Real? Why wouldn’t off site park & ride lots at SLAC and behind the
Berry Farm be of benefit in accomplishing this goal?

4) Why is there no discussion of No New Net Trips? No New Net Trips is a
requirement of Stanford’s Santa Clara County General Use Permit. Why
doesn’t the DEIR discuss the applicability of this County requirement to the
SUMC?
36. Michael Griffin (letter dated June 24, 2010)

36.1 The commenter states that while the SUMC Project sponsors know the zip code location of their employees, there is no attempt to correlate that data with the development of the project’s transportation demand management (TDM) scheme. In addition, the enhanced TDM program is heavily weighted to Caltrain because the majority of the SUMC employees live on the peninsula. Currently, the SUMC has approximately 10,000 employees of which 6,200 live in cities on the peninsula served by Caltrain. However, part of the enhanced TDM program also serves East Bay employees. As part of the enhanced TDM program, the SUMC Project sponsors would be required to use reasonable efforts to lease 75 spaces from AC Transit at the Ardenwood park-and-ride lot or an equivalent lot. The employees from the East Bay would park their vehicles at Ardenwood and ride the U-Line to the SUMC Project sites. Employees could also catch the U-Line at other stops in the East Bay such as at the Fremont/Centerville Amtrak Station or the Fremont BART Station; however, parking would not be provided by SUMC at these locations. Please refer to Master Response 1 for a more detailed discussion on the effectiveness of the GO Pass.

36.2 The commenter states that there is no analysis of the probability that Caltrain can and will have the means to deliver the capacity necessary to make the GO Pass a valid solution. The commenter also states Caltrain may not even exist and given this uncertainty, there should be a backup plan to the GO Pass. Please refer to Master Response 1 regarding the ability of Caltrain to provide the capacity for the GO Pass TDM measure and the viability of Caltrain.

36.3 The commenter is concerned about increased traffic from US 101 and notes that the Draft EIR should find ways to reduce impacts by providing incentives to use I-280, such as providing park-and-ride lots at SLAC and behind the Berry Farm. Please refer to Master Response 2 for a discussion of remote parking and other mitigation.

36.4 The commenter asks why the Draft EIR does not mention Stanford University’s goal of No New Net Trips, and its applicability to the SUMC Project. Please refer to Master Response 2 for a discussion of imposing a No Net New Trips requirement. Also, per CEQA Guidelines Section 15126.4(4)(B), mitigation measures must be roughly proportional to the impacts of the project. The standards of significance applied in the Transportation Impact Analysis are listed on pages 3.4-30 through 3.4-32 of this EIR. Based on these criteria, there could be some increase in traffic that would not result in a significant impact. As such, requiring no net new trips as a mitigation measure would be beyond the requirements of CEQA. Also, see Staff-Initiated Change 2, which provides the revised analysis of level of service (LOS) impacts, and the updated mitigation measures for significant LOS impacts. The mitigation measures identified in Staff-Initiated Change 2 are appropriate.
Michael Griffin, 344 Poe St. Remarks @ Palo Alto CC, 7/12/10

I have several questions concerning the adequacy of the Medical Center DEIR relating to traffic impacts.

37.1 First, Stanford knows the home location of all its employees by zip code, both on the Peninsula as well as East Bay, but there's no attempt to correlate the East Bay zip code data with the Traffic Demand Mgt. scheme. The mitigation proposal is Caltrain centric, only helping Peninsula employees, living in a city served by Caltrain. Question: why is there not a similar solution for East Bay employees to financially assist them in riding East Bay transit, thus keeping their cars off Peninsula roads?

37.2 Second, why is there no analysis on whether Caltrain will have the financial ability to deliver the required new capacity, to make a "go" of the Go Pass?

37.3 Why propose a Caltrain mitigation that is beyond Stanford's ability to deliver? Will there in fact even be a Caltrain when we need it? Why then, is there no discussion of a backup plan should Caltrain, for whatever reason be unable to perform?

37.4 Third, the trip distribution map on page 48 shows that the majority of regional traffic, attempts to access Stanford from the east, basically exiting off 101 and then sitting westward through the neighborhoods until finally reaching Stanford. Why doesn't the DEIR suggest incentivizing motorists to access Stanford off of Highway 280 in the west? Why wouldn't offsite park and ride lots at SLAC and behind the berry farm, for example, be of benefit in accomplishing this? Why was there no discussion of encouraging the use of western access, thereby avoiding traffic impacts throughout Menlo Park and Palo Alto between 101 and El Camino Real?

37.5 Fourth, why is offsite parking classified as an alternative to the GoPass, rather than as an adjunct to it? Especially considering the uncertainty of the Caltrain solution. It seems this would make a good Plan B...

37.6 Fifth, why is there no discussion of No Net New Trips? No net new trips are a requirement of Stanford's General Use Permit. Why doesn't the DEIR discuss the applicability of this requirement to SUMC? The Med Center IS Stanford, is it not? Thank you.
37. Michael Griffin (letter dated July 12, 2010)

37.1 The commentor states that while SUMC Project sponsor knows the zip code location of its employees, there is no attempt to correlate that data with the development of the project’s transportation demand management (TDM) scheme. Please see Response 36.1. In addition, please refer to Master Response 1 for a more detailed discussion on the effectiveness of the GO Pass.

37.2 The commentor notes that there is no analysis of the probability that Caltrain can and will have the means to deliver the capacity necessary to make the GO Pass a valid solution. Caltrain may not even exist. Please see Response 36.2. In addition, please refer to Master Response 1 regarding the ability of Caltrain to provide the capacity for the GO Pass TDM measure and the viability of Caltrain.

37.3 The commentor is concerned about increased traffic from US 101 and notes that the Draft EIR should find ways to reduce impacts by providing incentives to those who use I-280 and the park-and-ride lots at SLAC and behind Berry Farm. Please see Response 36.3. In addition, please refer to Master Response 2 for a discussion of remote parking and other mitigation.

37.4 The commentor questions why the remote parking solution is considered an alternative to the GO Pass rather than as an adjunct to it, especially given the uncertainty of Caltrain in the future. Please refer to Master Response 2 for a discussion of remote parking.

37.5 The commentor asks why the Draft EIR does not mention Stanford’s goal of No New Net Trips, and its applicability to the SUMC Project. Please see Response 36.4. In addition, please refer to Master Response 2 for a discussion of imposing a No Net New Trips requirement. Also, see Staff-Initiated Change 2, which provides the revised analysis of level of service (LOS) impacts, and the updated mitigation measures for significant LOS impacts.
From: Ken Hake [khake@sbcglobal.net]
Sent: Wednesday, July 21, 2010 2:02 PM
To: Stanford Project
Cc: khake@pausd.org; kenneth.hake@hp.com; lorimer@meer.net; david@solnick.net; christinaraes@earthlink.net; pwdolkas@jps.net; katrinacurrier@gmail.com; mariodell@earthlink.net; estherze@gmail.com; Council, City
Subject: Stanford Expansion Project - Traffic in Downtown North

To Steven Turner - Department of Planning and Community Environment,

For the record: I am a homeowner and resident living at 575 Everett Ave in the Downtown North neighborhood. I have three children who play outside everyday in front of our house. I bike to work most days and am a fervent supporter of having walkable, bikeable, livable neighborhoods. I have been watching the progress of the discussions with Stanford and am concerned about the impact to traffic for the Downtown North neighborhood. I am deeply concerned that the project will increase the amount of commuter traffic running through our neighborhood. Historically, our neighborhood has fought hard to decrease the amount of traffic in our neighborhood. A few years back, we were successful in getting some traffic mitigating devices in the neighborhood and this has helped. I don't want to see us take a step backward in this effort. Do we have any projections as part of the impact report that show what will happen on the residential roads in our neighborhood. I read recently that the intersection at Middlefield and Willow road will see a dramatic increase. I can imagine that there is a high probability that our neighborhood will also see an increase. If so, this is not an acceptable outcome.

What are the options for implementing stronger traffic calming devices in the neighborhood to make sure we aren't adversely affected. Right now we have "No Turn" signs during peak periods. I continually see cars ignore the signs and we don't have the police resources to adequately monitor this. I have called the department a few times on this point and they will send an officer out once in a while, but can't do it everyday. Is it possible to block off the entry points for Everett & Hawthorne in some workable traffic calming configuration? Similar to what they have done in the College Terrace and Evergreen Park neighborhoods?

Please let me know what I can do to ensure there is no increase to the traffic in our neighborhood.

Regards,

Ken Hake
575 Everett Ave
Palo Alto, CA  94301

38.1 The commentor states that he is a homeowner and resident concerned about the impact to traffic for the Downtown North neighborhood as a result of the SUMC Project. The Transportation Impact Analysis for the Draft EIR considered the two primary streets in Downtown North: Everett Avenue and Hawthorne Avenue. Draft EIR Table 3.4-20 on page 3.4-71 shows the results of that analysis. As shown in the table, both Hawthorne Avenue and Everett Avenue are expected to see an increase in traffic as a result of the SUMC Project of 127 vehicle trips per day (before implementation of mitigation). The City of Palo Alto uses the TIRE index to determine if an increase in traffic on a residential street results in a significant impact. The increase projected for Everett Avenue and Hawthorne Avenue would not result in a significant impact. The SUMC Project would also add traffic to the Willow Road/Middlefield Road intersection. However, the combination of traffic-adaptive signal technology, bicycle and pedestrian tunnels, and enhanced TDM measures (Mitigation Measures TR2.1, TR-2.2, and TR-2.3, respectively) would reduce impacts at this location to a less-than-significant level.

38.2 The commentor questions what options are available for implementing stronger traffic calming devices. As noted in Response 38.1, while the SUMC Project would add traffic to both Everett Avenue and Hawthorne Avenue, the volume is not high enough to cause a significant traffic impact. Therefore, no requirement for the SUMC Project to install additional traffic calming devices would be warranted.
Letter 39

David Harzy
622 Loma Verde Ave.
Palo Alto, CA 94306

Mayor and fellow Council Members,

I am David Harzy and live on Loma Verde Avenue. I work for the medical center, but I do not speak for the medical center. I am here as a Palo Alto resident.

I believe I have the best of both worlds, namely to work at a place that inspires and to retire every evening to a community by which I am able to renew myself for the next day’s challenges.

I know this evening focuses on DEIR chapters relating to noise, geology, soils, & seismicity, and other environmental impacts. As you stated Mayor Burt in your State-of-the-City Address, “Stanford and the city share in a vision of sustainability and we have more in common than that which separates.”

I am confident that, together, the medical centers and the city will find acceptable solutions to manage their way through.

I have been encouraged by the collaboration that is in evidence, and the positive comments made by the city manager and the planning staff.

I am also encouraged by the number of positive comments I hear from members of the City Council.

I am here to ask for your full support of the Stanford renewal project.

I agree with Council Member Holman on needing to have the necessary meetings so as to make informed decisions.

As you may have seen in a recent Palo Alto Weekly story, back in 1956 architect Durell Stone even grew frustrated in the protracted negotiations.

As you again stated Mayor Burt in your city address: “I am determined that we will move this project forward expeditiously this year through review by our relevant boards and commissions and finally the city council.”

I ask all of you not to waiver. Conduct the necessary meetings. Do what is necessary to be informed, but to bring this to a vote by year end, so we can begin at last to build our shared vision. Thank you.
39. **David Haray (letter dated July 19, 2010)**

39.1 *The commentor expresses support for the SUMC Project.* This comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of the project merits in the CEQA process.

*The commentor also concurs that additional meetings are necessary to make informed decisions.* Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review process.
July 26, 2010

Steven Turner
Advance Planning Manager
City of Palo Alto
Planning and Community Environment Department
250 Hamilton Avenue
Palo Alto, CA 94301

Re: Stanford Hospital DEIR

Dear Mr. Turner:

The DEIR on Stanford Hospital inadequately addresses the historical significance of the existing building and its architect, Edward Durell Stone. These flaws undermine its conclusion that the building is not significant, and cause it to fail to comply with CEQA. The draft report as written would lead to the unnecessary loss of a tremendously significant historic resource. I am writing this letter pro bono as a historian; I represent only myself.

In fact, Stanford Hospital is an excellent and representative example of mid-century modern architecture worthy of preservation. It draws on the historical precedents of Stanford University, reinterpreted by an important aspect of Modern architecture which is today, unfortunately, endangered. Edward Durell Stone is a major and distinctive figure in Modern architecture, but his buildings are today threatened; locally his Santa Clara library has been demolished and his Palo Alto libraries have been in jeopardy; his museum for Huntington Hartford on Columbus Circle in New York City has been largely lost through remodelling. Stanford University holds in trust an important example of his work and local culture, and it must be preserved.

I strongly contest the DEIR’s statement that demolition of the Stone building is unavoidable. I concur with the alternative assessments by city staff and by Architectural Resources Group, included in the DEIR, that the building is significant and that it can be fruitfully reused for other activities.

I speak from thirty years of experience researching and landmarking architecture of the recent past. I am very familiar professionally with the challenges of identifying and evaluating recent past resources. I have successfully qualified four buildings under fifty years of age (thereby requiring proof of Exceptional Significance) for the National Register of Historic Places. One of these buildings was Edward Durell Stone’s 1958 Stuart Pharmaceutical Factory in Pasadena, so I am very familiar with his work and the importance of his Stanford Hospital design.

I am an architect and author of eighteen architectural history books, most of them on twentieth century architecture in California and the West. Since 1986 I have also been the architecture critic for the San Jose Mercury News. My resume is attached.

Specifically, the inadequacies of the report include the following:

1. Outdated methodology: The DEIR’s conclusion relies on a SUMC report (Jones, Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project, 2007) which uses outdated and inadequate research methodologies. For example, by stating that the Stone building “is out of keeping with the Modern period,” the report exposes a limited and biased view of Modernism. In fact, Stone’s Neo-Formalism (of which this is an excellent example) is one extremely important facet of the history of Modernism. For another example, by stating that the Stone building “was out of place in this suburban setting,” the report is simply wrong. It fails to examine the character of suburban design, especially in the Palo Alto area, which contributed many significant buildings to the history of suburban architecture. The hospital is not properly assessed as a “Palace Hospital” as the report suggests, but as a large civic monument in a suburban setting. In this perspective, Stone’s use of scale, textures, landscaping, color, and courtyards skillfully blends a large building into the suburban setting. These are but two examples of the building’s significance to architectural history and Stone’s career which the DEIR ignores.

2. Inadequate assessment of Stone’s architectural concepts: Contrary to the DEIR’s conclusions, Stanford Hospital is both representative of Stone’s conceptual contributions to Modern architecture, and a notable expression of how those concepts could be adapted and applied in new ways to the specific requirements of a challenging program and unique site. The design typically embodies many of Stone’s contributions to Modernism, including his expressive use of concrete, his respect for the scale and historic precedent of the surrounding context, his integral use of ornamental features (including the textured concrete walls and open filigree screens), and his integration of nature in the use of courtyards, landscaping, and hanging planters. But contrary to the report’s conclusion, the building is indeed a “formative design.” It uses and adapts these elements, showing the flexibility of Stone’s vocabulary. This DEIR fails to properly assess the style of the hospital, its place in the development of Modern architecture (especially in California and the San Francisco peninsula), the innovations of its design, and its place in Stone’s work.
Thus its conclusion that the building should be demolished is unsubstantiated. In my opinion it would be eligible for the California Register of Historical Resources, as well as the City of Palo Alto historic inventory; I base this on my experience with similar mid-century Modern architecture.

3. Inadequate assessment of the landscape design: The contribution of landscape architect Thomas Church is not sufficiently analyzed. The courtyard landscaping, though somewhat altered, still expresses the original architectural and spatial intent of the design, and is easily restored. Even more important, however, is the remarkable integration of landscaping and architecture into a seamless spatial unity. The bulk of this large building is successfully and creatively reduced through these efforts. This is one of the contributions of this design to Modernism.

4. Outdated bias against Stone: The DEIR report relies on a biased and unexamined assessment of Stone’s work. Stone is still a controversial architect in some quarters. This report reflects that bias in accepting, without further analysis, the statement that Stone “was more popular however with the public than with his fellow architects and architectural critics,” continuing, “he is merely a rather engaging contemporary romantic.” While this reflects one opinion of Stone in his day, it is not sufficient evidence for the historical perspective we need fifty years later. As for current scholarly opinion, the report uses a limited number of references. Though briefly noting Vincent Scully’s recent defense of Stone’s Huntington Hartford museum in New York, the report simply dismisses such valid support (and much other support by other noted historians) without further analysis. Thus the report does not accurately reflect the reassessment of Stone and his era now underway. In fact, the evidence, the buildings, and the opinions exist to show his significance in introducing new concepts that helped shape twentieth century architecture in the Bay Area, nationally, and internationally. They are a significant part of the history of Modern architecture, and the loss of Stanford Hospital would have a negative impact on the cultural resources of Palo Alto, California, and the nation. Biased assessments of Stone’s work have already lead to the loss of important buildings. Stanford University must not further contribute to this decimation by allowing the hospital to be demolished.

5. Dismissal of alternative uses: The DEIR peremptorily assumes the “unavoidable” demolition of this building. Though it cannot be used as a hospital, there is a wide range of other educational and campus uses to which it could be properly retro-fitted. The DEIR fails to adequately assess these when it inaccurately states its demolition is “unavoidable.”

The Stone building is one of the most gracious and original buildings on Stanford’s campus from the mid century. Stone’s powerful design makes courtyards, fresh air, landscaping, and promenades the major determinants of the design. The finely textured concrete blocks bring a lightness to the building – especially when they open up unexpectedly to reveal the open air courtyards that are woven through the design, bringing light and air to patients, doctors, nurses, and visitors – and to pedestrians walking through the campus. The Stone hospital is large, but is scaled to suit its neighbors. It represents the qualities of humanity, nature, originality, and delight.

It is not sufficient to dismiss a building simply because of its recent vintage. Current scholarship and available information make it possible to assess this building’s concepts and techniques, its relationship to historical trends and context, its artistic merit, and to evaluate expert opinion. These high standards are required if historic preservation is to fulfill its purpose of protecting noteworthy buildings, especially when they are vulnerable. If we make that effort, however, the result is the enrichment of our cities for future generations, and the continuation of an ongoing tradition of California architecture.

The DEIR’s lax approach to a proper assessment of this building seems to indicate a lack of imagination or will on Stanford’s part to value and protect our common culture and history. The City of Palo Alto and the citizens of California deserve a more thorough and fair analysis than they are offered in this draft report.

Sincerely,

Alan Hess
RESUME OF ALAN HESS, ARCHITECT

WORK

1981-  Alan Hess, Architect

EDUCATION

1970-74  University of California, Los Angeles

TEACHING

1975-78  M.Arch, School of Architecture and Urban Planning, University of California, Los Angeles

PRESERVATION

1986-90  Lecturer, Southern California Institute of Architecture

FELLOWSHIPS

1981-  Alan Hess, Architect

BOOKS


SELECTED PUBLICATIONS


SELECTED TALKS

- "How to/whether to Save the Sixties," National Trust Forum, Summer 2010
- "Color in the Suburban Metropolis," Harvard Graduate School of Design, May 2010

GRANTS

- Graham Foundation for Advanced Studies in the Fine Arts, Chicago, IL 1990-91

RESUME OF ALAN HESS, ARCHITECT

WORK

1981-  Alan Hess, Architect

EDUCATION

1970-74  University of California, Los Angeles

TEACHING

1975-78  M.Arch, School of Architecture and Urban Planning, University of California, Los Angeles

PRESERVATION

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FELLOWSHIPS

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- Graham Foundation for Advanced Studies in the Fine Arts, Chicago, IL 1990-91
SELECTED REFERENCES TO WORK

PRINT MEDIA:

"Las Vegas meets la-la land," Smithsonian, October 1995
"In Los Angeles, a '50s Flameout," New York Times, September 7, 1995
"Oldest McDonald's Closes," New York Times, March 6, 1994
"Legacy of the Golden Arches," TIME, June 2, 1986
"Google: Fifties Coffee Shop Architecture, a review," Architectural Record, May 1986
"Who Says It's Not a Landmark?" Historic Preservation, November/December 1987
"Google -- History Closing the Menu on a 1950's style," Los Angeles Times, June 9, 1986
"Now let's hear it for Google style," Vancouver Sun, February 5, 1987
"Architecture and Design reviews," Philadelphia Inquirer, November 30, 1986
"Architecture To Go," David Dillon, Dallas News, June 22, 1986
40. Alan Hess (letter dated July 26, 2010)

40.1 The commentor states that the Draft EIR inadequately addresses the historical significance of the Stone Building complex by concluding that the building is not historically significant. This statement is incorrect. As stated on page 3.8-18 of the Draft EIR, Section 3.8, “The Stone Building complex is the only structure to be demolished that appears eligible for listing on the California Register of Historic Places (CRHR) (as described under Existing Conditions in this section) and is, therefore, considered by the City’s Historic Preservation Planner, in concurrence with Architectural Resources Group (ARG), to be a significant historic resource. The demolition of the Stone Building complex would result in a significant impact on an historical resource.”

As described on page 3.8-15 of the Cultural Resources section, two studies were performed to evaluate the historical significance of the Stone Building complex. One study was conducted in 2007 by Stanford University’s Director of Heritage Services and University Archaeologist, who concluded that the complex is not one of E.D. Stone’s major achievements, but was historically significant for association with organ transplantation work. Nonetheless, the complex lacked integrity and was therefore not eligible for listing on the CRHR.\(^1\) However, in 2008, the City hired ARG to perform a separate study, which included a peer review of Stanford University’s evaluation. ARG concluded that the Stone Building complex appears eligible for listing on the CRHR and should be considered an historical resource for the purposes of the CEQA review.\(^2\) ARG’s complete peer review is included as Appendix I in the Draft EIR. In addition, the City’s Historic Preservation Planner concurred with ARG that the Stone Building complex is an historical resource pursuant to CEQA.\(^3\)

Based on the findings by ARG, and the consensus of the City’s Historic Preservation Planner, the Draft EIR considers the Stone Building complex as a significant historic resource. As such, due to the demolition proposed under the SUMC Project, the Draft EIR concludes that the SUMC Project would result in significant and unavoidable impacts on the Stone Building complex. See Impact CR-1 on pages 3.8-18 through 3.8-23 for the impact analysis and proposed mitigation measures that would reduce the impacts on the Stone Building complex, but not to a level of less than significant.

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\(^1\) Jones, L., *Cultural Resources and the Stanford University Medical Facilities Renewal and Replacement Project*, 2007.


In addition, the commenter states that other buildings designed by E.D. Stone in the area are threatened. Please refer to Impact CR-5 on page 3.8-26 and 3.8-27 of the Draft EIR for a list and analysis of other E.D. Stone buildings within Palo Alto. As explained on pages 3.8-26 through 3.8-27 of the Draft EIR, E.D. Stone designed three other buildings in Palo Alto, in addition to the Stone Building complex. These buildings include the Palo Alto Civic Center, the Palo Alto Main Library, and Mitchell Park Library. The Palo Alto Civic Center and the Mitchell Park Library were evaluated by ARG, a historic consultant for the City. In this evaluation, it was determined that both of these buildings lacked sufficient integrity to quality as historical resources. However, the Palo Alto Main Library has been determined eligible for the National Register of Historic Places (NRHP).

Projects have been proposed that would alter or demolish the other E.D. Stone buildings in the City. Currently, plans call for the renovation and expansion of the Main Library, which could affect the historic integrity of the building. In addition, due to the seismically unsafe conditions at the Palo Alto Civic Center, the freestanding part of the arcade would be removed and the City Police Department and Emergency Operations facilities would be relocated from this area of the building. The third building, Mitchell Park Library, is proposed to be demolished since the existing facility is too small to house the demand of the expanding neighborhood. As stated on page 3.8-27 of the Draft EIR, the demolition of the Stone Building complex would have a cumulatively considerable significant and unavoidable impact due to the small body of E.D. Stone’s work present in the City that retains sufficient integrity to be eligible as historical resources. Therefore, the conclusions in the Draft EIR are consistent with the commenter’s remarks.

40.2

The commenter contests that the demolition of the Stone Building complex is unavoidable and believes that it can be adaptively reused. The Draft EIR describes and analyzes the SUMC Project site plan as proposed by the SUMC Project sponsors in the SUMC Project Application from 2007 and last amended in March 2010. Under the SUMC Project as proposed, the Stone Building complex would be demolished in order to construct the SHC clinic building and the SoM FIM buildings. The construction of these new buildings would help the SUMC Project sponsors achieve their project objectives, while the retention of the Stone Building complex would not meet several of the goals for the SUMC Project. The Draft EIR concludes demolition of the Stone Building complex results in a significant and unavoidable impact because mitigation would not be sufficient to reduce the impact to a less-than-significant level.

However, per CEQA Guidelines 15126.6, an EIR must identify a range of potentially feasible alternatives that attain most of the project objectives and reduce the impacts of the proposed project. Therefore, in response to this significant and unavoidable conclusion in Section 3.8, Cultural Resources, the Draft EIR includes an alternative to preserve and

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4 Dennis Backlund, City of Palo Alto Historic Preservation Planner, Historic Resources Board hearing, July 7, 2010.
reuse the Stone Building complex, as reflected in the Historic Preservation Alternative. Although this alternative would succeed in preserving the Stone Building complex, the alternative would not meet several of the SUMC Project objectives, as discussed on pages 5-45 through 5-48 of the Draft EIR. Please refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

40.3 The commentor states that the Draft EIR’s conclusions rely on the SUMC report. This is incorrect. As explained above in Response 40.1, the Draft EIR derives its conclusions regarding the Stone Building complex from the 2009 ARG peer review of the 2007 SUMC report and the opinion of the City’s Historic Preservation Planner. Contrary to the conclusions in the Stanford study, ARG considers the Stone Building complex as a significant historic resource. The City’s Historic Preservation Planner concurs with ARG. The Draft EIR is consistent with the findings in the ARG peer review and does not base its analysis of the Stone Building complex on the SUMC report. Although the SUMC report is described and cited in the Draft EIR (page 3.8-15), the study is not used as the sole source of the analysis.

40.4 The commentor believes that there is an inadequate assessment of Stone’s architectural concepts in the Draft EIR. Although Section 3.8, Cultural Resources, of the Draft EIR does not include a description of the architectural styles of the Stone Building complex, this is included in the ARG peer review, Appendix I of the Draft EIR.

The ARG peer review includes an analysis of E.D. Stone’s work, summarized as follows: E.D. Stone’s work during the second phase of his career has been called both Formalism and New Romanticism. The Stone Building complex at the Main SUMC Site, which was completed in 1959, was designed during this pivotal and innovative phase. The complex was designed after the American Embassy in New Delhi, India, which was another building by E.D. Stone during this same design phase, and symbolizes his departure from the International style to a Formalistic approach. The design of the Stone Building complex shares many of the character-defining features that E.D. Stone used on buildings from this period including: concrete grillework, symmetrical façade, massive overhanging eaves, loggias with tall slender columns, reflecting pools, and incorporated landscape elements such as gardens and courtyards. The Stone Building complex, along with the Palo Alto Libraries, was his first project out of his Northern California office in Palo Alto.5

As stated in the ARG peer review, E.D. Stone is considered by some to be one of the most outstanding midcentury architects. E.D. Stone influenced numerous architects and his grillework became popular nationwide mainly due to his work. In addition, E.D. Stone’s architecture addressed two of the central issues facing post-war architecture: the representation of human scale in large buildings and the role of ornament formerly cast

aside by modernists. Please refer to Appendix I of the Draft EIR for more details about the
design and styles of the Stone Building complex, its place in the development of modern
architecture, the innovations of its design, and its place in E.D. Stone’s work.6

A comment was also made that the Draft EIR concludes that the Stone Building complex
should be demolished. Per CEQA requirements, the Draft EIR does not advocate for
specific building designs or site plan modifications, unless these changes would feasibly
lessen significant impacts through mitigation measures. Therefore, the Draft EIR does not
conclude that the Stone Building complex should be demolished. As explained in Response
40.2, the SUMC Project site plans, as submitted by the SUMC Project sponsors in 2007
and as supplemented in March 2010, propose the demolition of the Stone Building complex
in order to construct new SHC and SoM buildings. Based on the proposed site plans, the
Draft EIR analyzes the impact of the demolition of the Stone Building complex. Since the
Stone Building complex is considered a significant historical resource and potentially
eligible for the CRHR in the Draft EIR, the impact would be significant and unavoidable.
The Draft EIR also identifies an alternative to its demolition.

The commentor states that the Draft EIR does not sufficiently address the landscape design
of the Stone Building complex. Although Section 3.8, Cultural Resources, of the Draft EIR
does not include a description of the landscape features of the Stone Building complex, this
is included in the ARG peer review, Appendix I of the Draft EIR.

The ARG peer review includes an analysis of the landscaping at the Stone Building
complex, summarized as follows: Landscape architect Thomas Church collaborated with
E.D. Stone on a number of projects during their careers, including the Stone Building
complex at the Main SUMC Site. The landscape features of the Stone Building complex
comprise of geometric paving, geometric planting beds, circular water features,
shrubberies, trees, and other plants. As stated in the peer review, nine of the ten original
courtyards continue to function as courtyards. Only one has been completely infilled by a
building addition and another is partially infilled. Despite the loss of plantings in some of
the courtyards, Church’s hardscaping generally remains intact. The most important
landscaping feature, the forecourt in front of the Stone Building complex, has a high degree
of integrity.7

However, as concluded by ARG, the landscaping in the courtyards is not a historic
resource. Since more intact examples of Thomas Church’s work remain, and since the
collaboration between E.D. Stone and Church did not appear to be particularly acclaimed

6 Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and
Peer Review, 2009.
7 Architectural Resources Group, Inc., Stanford University Medical Center Historic Resource Evaluation and
Peer Review, 2009.
or influential, ARG found that the landscaping at the Main SUMC Site is not significant as an example of the work of Thomas Church.8

40.6 The commentor states that the Draft EIR relies on a biased and unexamined assessment of E.D. Stone’s work. The commentor goes on to quote the 2007 study conducted by Stanford. As explained under Response 40.1, the Draft EIR bases its conclusions on the ARG peer review of this study and the opinion of the City’s Historic Preservation Planner. The Draft EIR considers the Stone Building complex a historic resource for the purposes of CEQA. The commentor’s statement that the loss of the Stone Building complex would have a negative impact on cultural resources is consistent with the analysis in the Draft EIR. Please refer to Response 40.1 for more details.

40.7 The commentor states that the Draft EIR dismisses the potential alternative uses of the Stone Building complex. Please refer to Response 40.2, above. It should be noted, as discussed above, that the Draft EIR analyzes the SUMC Project as proposed, which includes demolition of the Stone Building complex. The analysis in the Draft EIR concludes that, if the SUMC Project is developed as proposed, the demolition of the Stone Building complex would be a significant and unavoidable impact. The Draft EIR also identifies an alternative under which the Stone Building complex would be preserved and adaptively reused. In addition, refer to Master Response 8 for the range of alternatives analyzed and considered in the approval process.

40.8 The commentor reiterates his point that the Stone Building complex is a significant historical resource and that it should be protected. Please refer to Responses 40.1 and 40.2, above.

40.9 The commentor requests a more thorough analysis of the impacts to the Stone Building complex. The findings by ARG in their peer review, and the consensus of the City’s Historic Preservation Planner, are considered to be adequate for the purposes of CEQA. The ARG report, included as Appendix I in the Draft EIR, includes a review of the Stone Building complex and the contributions of E.D. Stone as an architect, as summarized above in Responses 40.4 and 40.5. The Draft EIR, which is consistent with the ARG report, concludes that the Stone Building complex is an historic resource. Therefore, the conclusions of the ARG report, the City’s Historic Preservation Planner, and the Draft EIR are consistent with the comments raised by the commentor. No further study is warranted.

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I think it is important that traffic mitigation planning for the hospital project consider the (real) possibility that in the future Caltrain may either not be running or running at reduced capacity.

41.1 The commentor states that it is important that traffic mitigation planning for the hospital project consider the possibility that in the future Caltrain may either not be running or running at reduced capacity. Please refer to Master Response 1 for a discussion on the viability of Caltrain.
Dear City Council members, City Manager James Keene, and Commissioners,

With the deadline for comments on the EIR for the new Stanford Medical Center project approaching I am submitting my thoughts at this 11th hour. Having left our home at 7 Lincoln Ave. in Mill Valley in 1959, our family built a home on San Francisco Ct. on the Stanford campus, due to the Medical School moving down from San Francisco and the Medical Center opening where my father assumed the position of Chief of Cardiology. In 1967 he took the position of Chief of Cardiology at the Palo Alto VA Hospital, where he worked until his death in 1997 at the age of 80, (after chemotherapy).

I attended Bing Nursery School, we won the city basketball championship in 6th grade at Escondido by one point, then attended Terman Jr. High, where our 9th grade basketball team went 17-0 getting our picture in the Palo Alto Times with a caption that read Perfect Season. That summer, 1972, I went with a group of 17 students and counselors to Europe for 6 weeks, climbing the Briethorn in Zermatt Switzerland with Bill Moody, a fellow scout of Palo Alto’s Troop 51. We ended our trip in Amsterdam with a 17 course Armenian dinner, honoring in a way my mother’s mother, born on the same day as Herb 25 years earlier, be the son of Swedish immigrants, and she the youngest daughter of Armenian immigrants. I was was married 18 years to the day the Palo Alto Times photo came out, on Tennis Day 1990, also the day we raised the flag on two Junas in 1948, my wife being an Iroquois Indian who was the platoon leader of her basic training unit in the U.S. Army, whom I proposed to on Valentines Day after breaking up with my Japanese girlfriend I’d met climbing in the Kita Alps of Japan in 1985. I played on Ernie Lydecker’s undefeated tennis team at Gunn in 1972-73 and married her at Cupid’s Chaple of Love, in Reno Nevada.

Engraved on the outside of Stanford’s Memorial Chapel are four words, Faith, Love, Hope and Charity. My comments reflect many years of struggle here in the Palo Alto area, living every year of my life in California where both of my parents were born. When I was in kindergarten our pediatrician at the Welsh Rd. Medical Clinic went out of his way to try and get me sick with the mumps, initially sending me to the home of a classmate who was contagious, the daughter of the men’s gymnastic’s coach and my first tennis instructor. I felt I was being abused with the same power and control I’d witnessed serving food and washing the dishes for parties my parents gave at our home for Stanford physicians and residents, and despite my friendship with Kelly (Gilmore) I refused to get the mumps from her because of the reality I saw, that if I did what he wanted this time he would want to do more, and I didn’t feel this was fair nor did I want this doctoring of love hanging over my head in the years to come in a very competitive school environment. When our friendship ended, due to this loss, I wanted to get back at the doctors who so arrogantly felt they controlled human destiny. Sitting on the floor of their Escondito Village apartment I pledged that I would ‘find the cure to cancer’, something that they claimed was the only medical problem they hadn’t yet solved.

The comments I have to make are not intended to influence specific decisions you are responsible for making, but to share what I have learned in the last 47 years, based on this objective I set for myself, and how it relates to Stanford’s medical services in general. I am
aware, as all of you should be by now that our city's payments for health coverage have skyrocketed from about 6 million a year in 2002 to about 24 million this year, and as a college town with one of the best teaching hospitals in the world next door this seems kind of absurd.

I think Stanford, just like our new neighbors of East Palo Alto have much to offer to the general community, and ought to be regarded more as a partner or a good neighbor. My comments reflect a perspective that I think has been lost in chaos that has swept across the country in the name of capitalism, and is particularly focused on what I have learned attending Foothill College, San Jose City College, West Valley, Canada and Cabrillo over a span of time from 1980 to 1994, when I also managed the home next door to the 2nd Mayor of East Palo Alto (from 1984-1990) for ten tennants, finished building our summer home in Los Gatos which was my goal upon finishing high school, travels to Japan and Sweden, working for two of the best restaurants in Menlo Park and working as a carpenter on Hope St. in Mt. View (for Tim Taylor, who holds three master's degrees).

Unlike my two closest friends as a young teenager, Larry Good and Douglas Whitcher, who graduated from Stanford, I was frankly sick of people with credentials whose goal seemed to be to become the best in their field, yet always had someone else do their work for them. My grandfather did get his degree at Harvard before completing law school there, my mother has a master's degree in education, my father finished first in his class at Stanford's School of Medicine—along with the father of my golf instructor—my uncle is a minister, his other sister has a master's degree in music, and both of my brothers have B.S. degrees, one from Stanford and the other from U.C. Davis. There wasn't a lot of room for me to do better in academis, so I chose to be a cabinet maker, a painter, a custodian in an elementary school, and do skilled trade work before deciding to major in Culinary Arts and Hospitality Management, which incidentally was taught by seasoned professionals, most of whom are still there, one a past member of the U.S. Olympic cooking team.

In the 60's and 70's overwhelming evidence was showing the medical community that cigarettes were causing cancer; it became their mission to find the 'cure' to cancer... During the Viet Nam War era, drugs of all kinds were popular, as you may recall. A typical concert at Frost on the campus was filled with the haze of marijuana smoke. And the medical position, although it being a felony by law, was rather neutral, in that no evidence showed that marijuana cause cancer. I personally couldn't live with myself breaking the law in this way, most all of the people I associated with being pot smokers and dealers. I tried to commit suicide twice, once landing me at Belmont Hills Hospital and from there at Kings View Hospital in Reedley. I was able to finish my high school education without marijuana, as the valedictorian of the class of 1975 at Feather River Preparatory School, owned my Mr. Long of Longs Drugs, who sat with my father for the ceremony. I skied Jr. varsity and varsity on our ski team and won my girlfriend (from Hawaii) after beating her brother repeatedly in everything we did.

The search for the cure to cancer and other medical illness is predicated on what we allow in our capitalist driven economy; it applies not only to our health but to the environment, where money and profits are more important than health and land/resource management. Corporations thrive on maximizing their gains at the expense of people and the land they use to extract their resources. As long as there are no restrictions on what is allowed, environmentalists and the medical community will have endless work to do.

I learned my health as a student at Foothill
College in Health 101, 1985 and in Cabrillo
College's Culinary Arts & Hospitality
Management program, where I got my
certificate in 1994, along with a lifetime interest
as the last son in our family and my early
childhood ambitions. In one short class on food
borne illnesses at Cabrillo we were taught that
there are two major diseases to contend with, one
is infection and the other intoxication; viruses,
molds and yeasts make up only a small part
of food borne illnesses. Most are familiar with
infections and the medical development of
antibiotics to combat them; whenever a batch of
spinach or tomatoes comes out that may have e-
coli, the country goes berserk, recalling huge
shipments, or shutting down the plant. But
intoxication, which includes botulism is quite
different. It is not the rapid growth of bacteria
that causes illness, but the toxins that are
excreted from the cell walls that cause the
problem. It is the accumulated waste that can not
be effectively processed by normal body function,
and it is really no different than at a macro level,
a polluted river or a chemical waste dump. Just
as there is no 'cure' for Hunters Point Naval
Shipyard, there is no 'cure' for intoxication,
which leads to cancer, although there is a lot of
work to be done.

It's important to understand that certain
failures of our federal government's ability to
provide for the general welfare of the people have
allowed things to 'go wild', as Barney Frank
described to Charlie Rose the other night when
he was describing what happened on Wall
Street after regulations were removed nearly
completely. The core problems we have as a
country today stems from an ineffectively
regulated health system that seems to be based
in Maryland under the name of the FDA. By
allowing products to be sold that are known to
cause cancer, which in turn raise tax revenue
which we rely on we are in very dangerous
ground. Dr. David Kessler, the past

commissioner of the F.D.A. and dean of two
medical schools as well as being an attorney tells
us how the food industry has figured out that by
adding sugar, fat and salt to their products they
sell much more, resulting in our larger than
normal share of obesity, diabetes and heart
disease. But more costly than the management
of obesity, diabetes and heart disease is our
growing prison and jail population, a system that
ouses a quarter of the world's population of
locked up people, costing us something like
$45,000 a year per person, or more. These are
mostly people who buy tobacco products that
their bodies can't stand (or process the hundreds
of inorganic chemical toxins they produce, and
choose to do illegal drugs instead,
like marijuana, cocaine, and more, even heroin
physically addicting drug we are emptying
our financial reserves to try to control in
Afghanistan.

Building new and better hospitals and medical
services or prisons and jails is not the answer,
amore than finding new lands to pollute with
waste and geologically exploit. Our bodies are
sensitive just like the earth is sensitive and in
many ways we are what we eat; in computer
terms, GIGO: the garbage we put in is the
garbage we put out. Giving into the interests of
the tobacco industry or the food industry in
general is synonymous with what could have
happened if Microsoft gained a complete
monopoly in the information age. We need, as
Steve Jobs figured out when he suggested
we think differently, to act differently. Just
turning our heads to the 400,000 Americans who
die each year due to poison we allow to sell in the
way of 'fags', as the British call our cigarettes,
the same ones that took the life of people like
Linda McCartney and countless others, to build
new more expensive medical facilities is not the
answer.

R.J. Reynolds Co. nearly killed me back in 1981
when I was living in the only board and care
private corporations like the Hyatt. To try and convert the hospital to meet new medical standards is obviously impossible, but as an open air building that is nicely situated, beautiful in every way, it could be where faculty get cared for in their golden years.

Secondly, I think Stanford should practice medicine, not speed up the rat race to compete with corporate world which produces all the cases they get. They could, provide health care for our city employees at a stable and reasonable cost, so we as a city could plan and predict future costs, and extend their services to the community, as it is a great place for medical students to learn to become physicians.

I think every effort should be made to work with Stanford, negotiate with them, as George Schultz did for Ronald Reagan to wind down the cold war. This to me is more like a frozen war, reminding me of an early song Stevie Nicks and our native Palo Alto son Lyndsey Buckingham wrote, called Frozen love on their Buckingham Nicks album, (1974?) music I would encourage all of you to check out if you can find it.

Races are run.
Good luck,
John B. Hultgren. Palo Alto, Los Gatos

42.1 This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

42.2 The commentor opposes the demolition of the Stone Building complex and suggests alternative uses for the existing structure. Please refer to Master Response 8 for the range of alternatives analyzed and a discussion of the suggested variation on the Historic Preservation Alternative.

42.3 This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.
To: Palo Alto City Council, Palo Alto Planning & Transportation Commission, City Manager, Director of Planning and DEIR Manager of the Public Comments
Re: Stanford Hospitals Expansion DEIR, Transportation Section
From: Tom Jordan, 474 Churchill Ave, Palo Alto 94301
Date: 15 July 2010

The DEIR section on Transportation is legally inadequate under the requirements of the California Environmental Quality Act ("CEQA") in that (a) it does not describe the significant ongoing Stanford project, immediately adjacent to the currently studied Project, which Stanford is constructing pursuant to the General Use Permit ("GUP") issued by the County of Santa Clara in December 2009 and the impact that the 2000 GUP project will have on the currently studied Project as to transportation and all other matters, particularly since the 2000 GUP project is less than half way to completion and (b) it does not state the County's Traffic Standard set forth in the 2000 GUP, including the annual monitoring and required corrective actions by Stanford if the Traffic Standard is not met, all relevant because the two projects are adjacent and use interlocked roadways.

The Palo Alto Council should require Stanford to follow the same Traffic Standard that Santa Clara County required in granting to Stanford its 2000 GUP, which was for a development comparable in size to the one in the DEIR before you. Of course, the Palo Alto Council is not REQUIRED to do this -- being mandatory is NOT the issue --- but it is clearly the most effective and logical choice because:

1) The Stanford Campus, covered by the 2000 GUP, and the Stanford Hospitals, covered in the DEIR before you (a) are owned and controlled by the same entity, Stanford University and (b) are immediately adjacent and share exactly the same interconnected road network with no separation or distinction that can be observed by any driver.

2) The intermingled traffic of the two areas, which is impossible to separate, should be controlled by rules which are consistent and complementary, and the County 2000 GUP has led the way and the Palo Alto Council should now incorporate a parallel standard into its own permit to Stanford.

3) The County's 2000 GUP traffic standard (a) was accepted fully by Stanford without objection and (b) has been operating successfully for ten years, again without objection from Stanford or request for any modification.

4) The application of a Palo Alto Traffic Standard for the Stanford Hospitals application that is parallel to the 2000 GUP Traffic Standard will be easier for Stanford to achieve, not harder, than compliance under the 2000 GUP because (a) Stanford has more control over the numerous hospital employees (all 10,000+ of them, not just the new ones) as to where, if anywhere, they can park and the incentives and disincentives regarding how they commute to work than Stanford had or has over the many categories of new people coming to the campus under the 2000 GUP, which allowed 2,030,000 square feet of new academic buildings and over

3,000 new residential units, about a third of which are sized for families. Such control over the hospital employees alone, with no attention at all needed to the difficult or impossible to control patients and visitors, will result in compliance, and, as with any employer, Stanford can exert substantial effective control over its own employees.

In quick summary, the Palo Alto Council has before its eyes a Traffic Standard already in place and working successfully for ten years, fully accepted at inception and throughout the entire ten years by the same Applicant now before the Council (even the Stanford President and Stanford's local government lobbyist are the same from 2000 to the present), and for land immediately adjacent and tied to the 2000 GUP land by the same interconnected road network. Why, on earth, would the Palo Alto Council not apply the same Traffic Standard to the current project as was applied in 2000 and which has worked successfully? As of this time (late in the DEIR comment period but before any Palo Alto Council action), the answer is, simply put, because the DEIR ignored all of this, as did the Palo Alto Planning Department in their responsibility to inform the DEIR firm and to advise the Council. But the DEIR has not been accepted by the Council, so the Council still has full control of the outcome and can direct its Planning Department (and the DEIR firm if that is deemed legally necessary) to explain fully why the 2000 GUP Traffic Standard should NOT be a guide for Palo Alto for the Stanford Hospital Expansion. The logic for such adoption is so strong that the burden of proof should shift to have them -- including Stanford if it wishes to speak on the point -- explain why it should NOT be adopted. The issue of how Planning missed this can be, and should be, dealt with by the Council later, but the focus now is to move forward to approve this project with full proper protection of the public interest, both environmental and fiscal.

One fully stated example will demonstrate the above: You are driving your car to Stanford Hospital. You exit #101 at Embarcadero Road and drove down it toward Stanford. You have just crossed El Camino Real and have entered the Stanford Campus at Galvez. By doing so, you have left the Palo Alto Traffic Standard and have entered the County 2000 GUP Traffic Standard Area. From Galvez you bear right on Arboretum to Quarry Road. Somewhere along there, not sure exactly where, you left the County Traffic Standard and entered, again, Palo Alto Traffic Standard as you proceed to the front of the Hospital. If you had wanted to go to the back of the Hospital, where the Emergency Room is, you could have used different streets, but you would have, unavoidably, gone from Palo Alto to County and back again. Now consider that for the year 2005 Stanford came within 14 auto trips of exceeding its limit. The County Traffic Standard has, as it should, some flexibility built in. Stanford is given some time to return to compliance, and in 2005 Stanford obviously took steps to come back in to compliance. But, had compliance not been restored within the permitted time the County Traffic Standard specifies intersection improvements that Stanford must contribute toward, which must be done to the

Memo from Tom Jordan on Stanford Hospital Expansion DEIR, Transportation Section
July 15, 2010
Page 2 of 4
43.3 Con't

County's and the local jurisdiction's satisfaction, or the construction permitted to Stanford under the 2000 GUP will stop --- repeat, for emphasis, construction will stop. Can any thing be clearer than that there needs to be complementary Traffic Standard by the County and Palo Alto. To underline the close connections of Palo Alto traffic with the traffic on Campus, the intersection improvements specified in the 2000 GUP are five in Palo Alto, eight in Menlo Park and two in Santa Clara County, and the traffic studies referenced are for the entire urban area, not just Stanford lands or even the Campus. Of course, Palo Alto in adopting this Traffic Standard will add its own required traffic improvements to those already specified by the County, all to be done if Stanford Hospitals traffic does not comply. It will be consistent with, not destructive of, the County system.

It is very important to note, that none of the above is in any way inconsistent with the steps that Stanford is currently proposing to deal with increased traffic. All of Stanford's proposals, every single one of them, come under the general label of Traffic Demand Management ("TDM") WHICH IS EXACTLY WHAT THE COUNTY TRAFFIC STANDARD CALLS FOR. TDM is the method that is to be used first, and which everyone hopes will be sufficient, but, if it is not, the County Traffic Standard moves on to other steps to control traffic, and intersection improvements come into play. The crucial difference between the County Traffic Standard and what is proposed in the DEIR is that the County Traffic Standard sets a pre-construction traffic count which is the baseline and the ongoing goal, provides for annual traffic counts to be conducted by objective third parties, allows limited flexibility to give time to correct overages in the traffic count but, finally, goes to required physical improvements to control traffic if the count cannot be brought into compliance. In sharp contrast, the DEIR approach which is before the Council includes no baseline count, no objective annual monitoring and no physical improvements. The DEIR approach is simply that Stanford will do A and B and hope that it works. If it doesn't, "well, we tried and that is just the way life is - live with it." The County Traffic Standard leaves the risk of failure to control traffic with Stanford, where it should be because Stanford has created the traffic and has the knowledge, leverage and resources to control it. The DEIR approach puts the full risk of Stanford's failure on the public. Is that the Traffic standard the Council wants for this Project??

43.4

It is hard to believe that the five member Board of Supervisors, with only one of the five for whom Palo Alto voters can even vote, cares more about the traffic impact on Palo Alto streets of a large Stanford development project than Palo Alto's own nine member Council, all of whom live in Palo Alto and all of whom were elected by Palo Altans to protect the public interest of Palo Altans.

43.5

The Palo Alto Council should adopt for the Stanford Hospitals Project a parallel Traffic Standard to that set out in the 2000 GUP with appropriate additional traffic improvements specified beyond those already stated by the County if compliance cannot be maintained.

For all addressees, I will put in your box at City Hall this Memo plus the relevant pages of the 2000 GUP that form the basis for this Memo. The Traffic Standard provisions are at pages 12 through 19 and some of the maps are helpful. I will also include a copy of the article from a Palo Alto newspaper in 2005 reporting that Stanford nearly exceeded its traffic cap. I will give a copy of these materials to the City Clerk as well and she can decide what, if anything, should be reproduced for the public.
Stanford University General Use Permit

CONDITIONS OF APPROVAL

The following conditions have been established for the Stanford University General Use Permit (GUP). The conditions describe the distribution of additional building area, procedures under which construction may occur, and associated measures which must be accomplished before, during and after construction.

A. Building Area

1. The General Use Permit allows the following on the portion of Stanford University-owned land located in unincorporated Santa Clara County:

   a. Continuation of all lawful existing uses in their present locations, including legal nonconforming uses.
   b. Construction of up to 2,005,000 net square feet of new academic and academic support uses. The definitions of permitted uses are provided in the Community Plan. This limit applies to all nonresidential development which occurs during the time that this use permit is in effect. This academic building area total shall be known as the "GUP building area cap."
   c. Construction of 2,000 net new student housing units.
   d. Construction of 350 net new housing units for postdoctoral fellows and medical residents.
   e. Construction of 668 net new housing units for faculty and staff.
   f. Construction of 2,300 net new parking spaces above the current campus base of 19,351 spaces. This parking total shall be known as the "GUP parking cap."

2. The following amount of building area may be available to Stanford in addition to the GUP building area cap:

   a. Any building area remaining under the 1989 General Use Permit which has not been developed as of the time of approval of this General Use Permit shall not count toward the GUP building area cap. In addition, up to 212,218 square feet of building area credit for vacating of unreinforced masonry buildings may be granted. At such time as these unreinforced masonry buildings are rehabilitated for use, their building area shall be counted against the 2000 GUP building area cap, unless they are used for residential purposes.
   b. Any project for which a use permit application was filed prior to November 1, 2000 but which was not approved prior to approval of this 2000 GUP may continue to be processed as a separate use permit as provided by the 1989

G. Transportation

1. Stanford shall modify the following intersections as specified in the Community Plan/General Use Permit EIR Mitigation Monitoring and Reporting Program. Construction shall begin on intersection modifications within one year of approval of the General Use Permit and be completed within a reasonable time. At the time the modifications are to be constructed, alternative modifications which have equal or greater impact mitigation value may be proposed by Stanford and approved by the County.
   a. Arboretum Road and Palm Drive.
   b. Welch Road and Campus Drive West
2. Stanford shall continue to meet the transportation requirements established through the 1999 General Use Permit in order to continue mitigating for the population added to the campus under that use permit. Stanford shall also provide transportation alternatives for students, campus visitors, and other non-employees traveling to or residing on the campus.

3. Stanford shall mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through proportional funding of mitigation measures for specified impacted intersections. If Stanford does not attain the no net new commute trips standard as defined in Condition G-4 below, mitigation of impacts to individual intersections as defined in Condition G-5 will be required.

4. The no net new commute trip standard is defined as no increase in automobile trips during peak commute times in the peak commute direction, as defined at a defined corridor location around the central campus.

5. The reasonable cost of all traffic counts conducted for determination of compliance with this condition shall be paid for by Stanford and the counts shall be performed by an independent consultant under the direction of the County Planning Office.

6. A baseline count (consisting of an average of three separate counts as described in Condition G-7) shall be established prior to construction of the first new non-residential structure to determine the existing level of commute trips entering the campus during the morning peak commute period and leaving the campus during the evening peak commute period. The "peak commute period" is defined as the one-hour period of time with the highest volume of traffic, as determined by the counts. The counting methodology is defined in Condition G-7 below. Monitoring counts shall be performed each year using the same methodology or any alternate methodology determined by the County Planning Office to be more accurate.

7. Traffic counts and determination of traffic volume shall occur as described below. Detailed methodology is contained in the Mitigation Monitoring and Reporting Program.
   a. Peak hour traffic for a single year shall be determined through counts taken at three times during the year. All counts shall be conducted during the regular academic year, which does not include academic breaks or end-of-quarter finals. Specific times for each count shall be determined by the County Planning Office. The three annual counts shall be averaged to determine the annual traffic level for the baseline and each monitoring year.
   b. All counts shall be taken at the campus entry and exit points shown in Figure 3, which together form the defined corridor line.
   c. Traffic counts shall include a license plate survey and matching to determine the rate of cut-through traffic.

8. The County Planning Office will recognize participation by Stanford in off-campus trip reduction efforts and credit reduced trips towards Stanford's attainment of the no net new commute trips standard. Stanford shall receive credits in proportion to the actual number of trips reduced, and the proportion of the cost of the program that Stanford is contributing. Trip reduction must occur in the area between Bascom Avenue and Sand Hill Road, Interstate 280, and Arastadero Road/Charleston Road. The County Planning Office will determine the appropriate trip credit methodology for each program in which Stanford chooses to participate. Such proposals shall be submitted to the Planning Office for review, modification, and consideration of approval. The proposals shall be presented to the CRG prior to any determination by the Planning Office.

9. The Planning Office shall monitor the corridor count volumes using the procedures described above. If the corridor counts, as modified by trip reduction credits, exceed the baseline volume as calculated under Condition G-6 by 1% or more for any two of the three consecutive years, mitigation of impacts to intersections will be required as described in Table 6.
a. Stanford shall contribute funding proportional to the level of its impact from traffic associated with the GUP to the appropriate jurisdictions for modification of the intersections as described above. At the time the modifications are to be completed, alternative modifications or other efforts which have equal or greater import mitigation value for the affected intersections may be identified, based on consultation between Stanford and the appropriate jurisdiction with approval by the County Planning Commission.

b. The appropriate proportional funding for the identified mitigations shall be determined by the County Planning Office, in consultation with the affected jurisdictions.

c. Stanford and the affected jurisdictions shall reach an agreement on mitigations and funding within twelve months of the time that the County has determined that intersection-based mitigation will be necessary. Stanford shall do one of the following alternatives: 1) allocate the appropriate funding for the project for the project during this time, to be provided to the jurisdiction or placed in an independent escrow account, or 2) reach an agreement with the affected jurisdictions for an alternate mitigation that achieves the same traffic result. If option 2 is proposed, the County Planning Commission must consult with the option and plan, if neither of these options is achieved, development at Stanford shall be suspended until an agreement is reached and funding is allocated or the no net new commute trip requirement is satisfied.

d. If the City of Menlo Park approves widening of Sand Hill Road and associated intersection modifications prior to the time that the intersection modifications described above are triggered, Stanford shall not be required to fund intersection modifications at Junipero Serra Boulevard/Campus Drive West, Junipero Serra/Alpine/Santa Cruz, Santa Cruz/Sand Hill, or Sand Hill/Oak intersections. If the City of Menlo Park does not approve widening of Sand Hill Road and associated intersection modifications prior to the time that the GUP-related intersection modifications are triggered, Stanford shall place its share of the funds for modification of these intersections into an independent escrow account until either the City of Menlo Park approves the widening or the funding that Stanford has provided to the City of Menlo Park for that purpose expires. If the City of Menlo Park approves the widening of Sand Hill Road during the time that the funds for these GUP-related intersection modifications are in escrow, the funds shall be returned to Stanford. If the City of Menlo Park allows the funds for the widening of Sand Hill Road to expire, the GUP-related escrow funds shall remain in escrow until they are used by the appropriate jurisdiction.

e. Modifications to individual intersections either included or in addition to those in the above list may be required as the result of project-specific traffic studies, as described in Condition C.11.

10. Neighborhood traffic studies. Stanford shall participate in any future neighborhood traffic studies initiated by the County of Santa Clara, City of Palo Alto, or City of Menlo Park in the area bounded by Middletown Road, Willow Road/Santa Cruz Avenue, Sand Hill Road, Interstate 280, and Page Mill Road/Oregon Expressway. Stanford shall not be required to fund more than 50% of the cost of any such study. Stanford shall not be required to pay more than a total of $100,000 toward such neighborhood traffic studies over the GUP period, or more than $50,000 for any single neighborhood traffic study. The purpose of Stanford’s participation in such a study shall be to determine how much, if any, cut-through traffic in neighborhoods is attributable to traffic generated by the central campus. If impacts attributable to central campus traffic are identified in the studies, Stanford shall contribute to reasonable identified mitigation measures to a degree proportional to Stanford’s impact from development associated with the GUP. It is the responsibility of the jurisdiction sponsoring the study to inform the County Planning Office of any such study and formally request conditions on this condition. Stanford’s participation in a study may be waived if:

a. The sponsoring jurisdiction has waived this requirement of Stanford for any individual study.
b. On request by Stanford, the County Planning Commission has waived this requirement of Stanford for any individual study, or adjusted the proportion of the cost of the study that Stanford will be required to pay. The Planning Commission’s action may be appealed to the County Board of Supervisors by any interested person.

11. Project-specific traffic studies. Stanford shall submit for review and approval by the Planning Office project-specific traffic studies for the projects identified below, as well as other projects of similar size and scale. These studies shall address trip distribution (to determine whether distribution would be substantially different from the distribution assumed in the GUP/GUP EIR project safety, effects of the project on nearby streets and intersections, pedestrians and bicycle facilities, parking, and transit. At the discretion of the County Planning Office, traffic studies may also be required for other proposed projects:
   a. Addition of housing in Escondido Village, including but not limited to housing along El Camino Real adjacent to Escondido Village, that exceeds 100 units
   b. West Campus and Lagunita faculty/staff housing development
   c. Performing Arts Center
   d. Expansion/replacement of basketball arena
   e. Stanford Avenue faculty/staff housing
   f. Parking lots or structures with a net increase in spaces of 400 or more

12. Construction Traffic. Stanford shall comply with the following conditions regarding management of traffic related to construction activities and submit a plan implementing the following standards for approval by the County Planning Office prior to the commencement of any new building construction:
   a. Stanford shall provide adequate off-street parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the construction sites, a satellite parking area shall be designated, and a shuttle bus shall be operated.
   b. Stanford shall not substantially limit pedestrian circulation during construction of the project.
   c. Stanford shall not substantially reduce bicycle circulation while constructing the project.
   d. Stanford shall make feasible attempts to limit the number of construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. Stanford shall be required to prohibit or limit the number of construction employees from arriving or departing the site between the hours of 4:30 PM and 6:00 PM.

Page 17  Approved 12/12/00

13. Special Events. Within one year of GUP approval, Stanford shall submit a Special Events Traffic Management Plan to the County Planning Office. After the Plan is presented to the CRC, the Planning Office shall determine whether the Plan complies with this condition. The Plan shall include, but not be limited to, the following:
   a. Identification of appropriate traffic control mechanisms, personnel and procedures to ensure the orderly flow of traffic during special events.
   b. Public notification by Stanford at least 30 days prior to events where attendance is expected to meet or exceed 10,000 persons. Public notification shall include, but not be limited to, public notice in two newspapers of general circulation in the Palo Alto and Menlo Park area (e.g., Palo Alto Weekly, Palo Alto Daily News). Information provided in the notice shall include, but not be limited to, the date, time and specific location of the event, identification of the public streets or other facilities that will be closed or otherwise substantially affected by the event, and suggested alternate transportation routes. If more than one such event is anticipated during a given week, the public notifications for all of the week’s events may be combined. The notice shall be at least 1/8 of a page in size.
   c. Establishment and maintenance by Stanford of a special events telephone hotline and website accessible to the general public where information on
upcoming special events and associated traffic impacts as described in subsection (a) may be obtained.

14. Junipero Serra Boulevard/Stanford Avenue. Stanford shall convene regular meetings of a multi-jurisdictional group to address the existing traffic problems of volume, safety, and noise on Junipero Serra Boulevard and Stanford Avenue. The group shall include representatives from the University and the Stanford Campus Residential Landowners (or its successor organization), and may include representatives from the County’s Fifth Supervisorial District Office, County Department of Roads and Airports, the City of Palo Alto, the Stanford Golf Club, the College Terrace Residents’ Association, and/or the California Highway Patrol. The objective of these meetings is to identify and work toward implementation of feasible solutions to the existing problems of Stanford Avenue and the Junipero Serra Boulevard corridor. These problems include but are not limited to noise, access from residential driveways, and the safety of motorists, pedestrians, and bicyclists. If traffic mitigations affecting Stanford Avenue or Junipero Serra Boulevard are triggered by failure to achieve the “no net new commute trips” standard, Stanford and Santa Clara County will, in consultation with the multi-jurisdictional group, reevaluate the mitigation measures identified in the EIR prepared for the Community Plan and GUP and determine if equally effective mitigation measures or alternatives are preferable. In doing so, the members of the multi-jurisdictional group may help form solutions, comment on their feasibility, and participate in their prioritizing. This process will also facilitate the ability of participants to comment to the agency or agencies with jurisdiction over implementation of such mitigation measures. The annual report shall include information regarding the success or failure in addressing these concerns.

H. Parking

1. The total net additional parking spaces on the campus shall not exceed 2,300 spaces, with the exception of parking provided for any housing in excess of 3,018 units, which shall be considered by the County Planning Commission at the time of consideration of the housing proposal. Net additional parking in each development district shall not exceed the totals specified in Table 5, except with environmental assessment as specified in Condition D.B. Parking constructed as part of and to serve new faculty/staff housing in the areas designated Campus Residential-Low Density and Campus Residential-Medium Density shall not count toward the limits shown in Table 5.

Table 5: Parking Distribution – Maximum Net Additional Parking per Development District

<table>
<thead>
<tr>
<th>Development District</th>
<th>Net additional parking spaces</th>
</tr>
</thead>
<tbody>
<tr>
<td>West Campus</td>
<td>50</td>
</tr>
<tr>
<td>LaHonda</td>
<td>60</td>
</tr>
<tr>
<td>Foothills</td>
<td>0</td>
</tr>
<tr>
<td>Lagunita</td>
<td>700</td>
</tr>
<tr>
<td>Campus Center</td>
<td>200</td>
</tr>
<tr>
<td>Quarry</td>
<td>800</td>
</tr>
<tr>
<td>Arboretum</td>
<td>0</td>
</tr>
<tr>
<td>DAPER &amp; Administrative</td>
<td>1,700</td>
</tr>
<tr>
<td>East Campus</td>
<td>900</td>
</tr>
<tr>
<td>San Juan</td>
<td>100</td>
</tr>
</tbody>
</table>

2. In addition to the neighborhood traffic study funding requirements in Condition G.10, Stanford shall participate in residential parking permit programs in neighborhoods within the City of Palo Alto that are immediately adjacent to the campus and have a demonstrated spillover parking impact from activities on Stanford lands in unincorporated Santa Clara County as specified below:

a. Within twelve months of General Use Permit approval, Stanford shall allocate funding to the City of Palo Alto or to an escrow account for a residential parking permit program in the College Terrace neighborhood, bounded by Stanford Avenue, El Camino Real, California Avenue, and Amherst Street. The funding shall be for the purpose of consideration and initiation of a parking permit program and shall not be required to exceed $100,000.

b. If the cost of the consideration and initiation of a residential parking permit program for College Terrace is less than $100,000, the remaining increment of the $100,000 may be used by the City of Palo Alto to conduct a study of parking activity for the Southgate and Evergreen Park neighborhoods in the area bounded by the Caltrain tracks, Churchill Avenue, El Camino Real, and Cambridge Avenue. The purpose of the study would be to determine if there is a need for a residential parking permit program to be initiated in these neighborhoods due to activity on Stanford lands in unincorporated Santa Clara County. The funds may be used for this purpose at any time during the term of this General Use Permit, and shall remain in escrow until they are used by the City of Palo Alto. If the funds are not used by the City of Palo Alto during the term of the General Use Permit they shall revert to Stanford.
c. All operational noise sources shall comply with the County Noise Ordinance.

d. Noise from special events, including but not limited to fireworks displays and events where large numbers of people are gathered, shall comply with the County Noise Ordinance.

4. Fireworks displays will be permitted at no more than two events per calendar year unless an entertainment event license is obtained from the Planning Office.

5. Stanford shall maintain a hotline to which community members may report noise complaints. The hotline shall be staffed during all outdoor special events with attendance greater than 10,000 persons or where amplified sound is used. All calls to the hotline shall be reported to the County on an annual basis as part of the Annual Report process. Stanford may petition the County Planning Commission for removal of this hotline requirement after two years from the effective date of this GUP if there is no demonstrated need for the hotline.

S. Additional Conditions

1. Applicant's Acceptance of Conditions of Approval. Within 60 days after the final approval of the GUP by the Board of Supervisors, Stanford shall, in writing on a form provided by the County, accept the GUP and agree to be bound by, comply with, and do all things required of Stanford under the conditions of the GUP. The GUP shall not have any force or effect prior to the time that such signed acceptance has been submitted to the Planning Director. If such acceptance is not submitted before the expiration of the 60-day period, it shall thereafter be accepted and the GUP shall thereupon lapse and be null and void, except with respect to those provisions and conditions of the GUP which authorize residential development and establish conditions with respect thereto, which shall remain valid and enforceable.
**News Digest**

**One percent for art** approved

To beautify the city, the Palo Alto City Council has approved a “one percent for art” program that guarantees funding for art in city-owned places. Whenever the city undertakes a construction project that will have a visual impact on the environment, it will have to set aside 1 percent of the budget for artwork. Artists will be selected by a request for proposal process, and the work is expected to be integrated into the design as a whole, rather than in a last-minute addition.

In the coming six years, the policy will cost about $42,000, according to city estimates.

Art in city spaces is nothing new; capital improvement projects such as the two downtown parking garages at Bryant and High streets have included art components. Decorated with birds and basketballs, they've come to be known as the "bird" and "basketball" garages.

Future capital projects affected by the "one percent for art" program could include library renovations, new police buildings, parks, gateways to the city and bridges, walls and tunnels.

The new policy does not extend to private developers. Many private projects are already required to have a public art element.

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**Stanford on verge of traffic limit**

Stanford University is close to the limit on the number of morning and evening automobile commutes by its employees permissible under its general negative space ($5.04) granted by Santa Clara County in 2001.

As a result, Stanford has recently asked all university managers to find ways to reduce the number of employees who are single-vehicle commuters by 10-12 percent, the Stanford Report newspaper reported Wednesday.

The county allows Stanford 3,474 morning commute trips and 3,391 evening commute trips. In traffic surveys taken last fall, the university came within 14 trips of the evening limit.

"The last traffic study shows we are close to the limit imposed by the GNP, and the trend suggests we will soon exceed it unless we act aggressively," Stanford spokesman Steve Pifer said. He also noted that the university's parking policies and plans to reduce single-car commuting, by having more "park-and-ride" options, would not be enough.

The university also encourages its employees to use public transportation, carpooling, and bicycling. The university's director of community relations said the university also has a "spatial planning" program to improve traffic flow.

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43. Tom Jordan (letter dated July 15, 2010)

43.1 The commentor states that the Draft EIR is inadequate because it does not include the Stanford University 2000 Community Plan and General Use Permit (CP/GUP) project, which is only half way completed. Please refer to Master Response 3 for a discussion of Background Growth/Cumulative Traffic Impacts.

43.2 The commentor states that the Draft EIR is inadequate because it does not state the County’s Traffic Standard, including annual monitoring and required corrective action if the standard is not met. Please refer to Master Response 2 for a discussion of No New Net Trips and other mitigation based on trip counts.

43.3 The commentor states that the Palo Alto City Council should require SUMC Project sponsors to follow the No Net New Trips standard because the Stanford University campus and the SUMC are controlled by the same agency, and traffic from the two areas is intermingled and cannot be separated. Please refer to Master Response 2 for a discussion of No Net New Trips.

43.4 The commentor states that the TDM measures proposed as part of the mitigation measures for the SUMC Project is exactly what the County Traffic Standard calls for. If TDM measures do not work, as demonstrated by the annual monitoring, the commentor states other mitigation measures are required. Please refer to Master Response 2 for a detailed discussion of No Net New Trips and other mitigation based on trip counts.

43.5 The comment provides opinion regarding the County Board of Supervisors and the Palo Alto City Council. This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

43.6 The commentor states that the Palo Alto City Council should adopt a policy similar to the CP/GUP Traffic Standard for the SUMC Project. Please refer to Master Response 2 for a detailed discussion of No Net New Trips.
To: Palo Alto City Council, Palo Alto Planning & Transportation Commission, City Manager, Director of Planning and DBIR, Manager of Public Comments
Re: Stanford Hospitals Expansion DEIR, Population and Housing Section
From: Tom Jordan, 474 Churchill Ave, Palo Alto CA 94301
Date: 21 July 2010

The DEIR section on Population and Housing is legally inadequate under the requirements of the California Environmental Quality Act (CEQA) in that (a) it assesses the impact on population and housing of all the construction from the Project as though it is all to be completed and occupied in the year 2025--ie, comparing, as it does, these increases to ABAG projected growth for 2025--to the exclusion of looking to when the various buildings are to be completed as set forth in the DEIR in Tables 2-13 through 2-16, which Tables show completion dates of 2012 to 2015, ten to thirteen years earlier, (b) it takes the population and housing figures generated by Project construction and occupation and compares them to ABAG projections made in 2005 and concludes that ABAG projections have already taken the Project growth into account, even though, obviously, the ABAG projections made in 2005 could know nothing of the Project (which was unknown to the public until Stanford announced it two or three years later) so the Project growth projections must, logically, be added to THE ABAG 2005 projections, not be considered as already projected in them and (c) it ignores the clear fact, known to all except the DEIR firm, that ABAG will consider employment growth within Palo Alto City limits as the main factor in setting for 2015--2022 Palo Alto’s share of Regional Housing Needs (under Government Code 65580 et seq, cited at page 3.13-5 of the DEIR but then ignored thereafter) and ABAG certainly will not accept, as the DEIR does, that only 8% of the new employees generated by the Project need be housed in Palo Alto. These clear mistakes and omissions in the DEIR are so basic and so blatant that it may be hard for the Council to accept as they are at least, but they are, I, therefore, urge the Council to reject their common sense and knowledge of the matter in proceeding. The Council is still in control of the CEQA process and should be fully satisfied on these points -- fully satisfied -- before acting on Stanford’s Application. The DEIR’s amazingly bad handling of these three issues is most likely traced to Stanford’s own improper direct involvement in the preparation of the DEIR for many months at the beginning of the process. Only after citizen complaints to City Planning that it was improper for Stanford, the Applicant for the Project, to be in daily touch with the EIR firm in its preparation was the direct daily contact halted by City Planning, but it is impossible to un ring a bell. Very likely the seeds for these clear mistakes were planted then. For whatever reason, there are mistakes, and they must be corrected before proceeding.

To expand somewhat on the three errors stated above: As to issue (a) it seems completely clear that the buildings in the Project will be occupied soon after completion -- not immediately, but soon -- and Tables 2-13 through 2-16 state when the buildings will be completed, which will for all intents and purposes be 2012 through 2015. Those, then, become the dates for the increase in employment thus an increase in daytime population thus an increase in people living in Palo Alto thus an increase in need for housing in Palo Alto and for increase in traffic in the area, either from new residents or new commuters. To use 2025 as the measure is simply absurd. The impact will come when the people come and they will be here ten years and more earlier than analyzed by the DEIR. All without any consideration for the increased employment and activity from the construction/demolition itself.

As to issue (b) look at what Stanford filed its application for this Project and compare that date to the release in 2005 by ABAG of its projections to 2025 in all categories relevant to this DEIR, which projections were probably based on data gathered for years prior to 2005, which was only the release date, not the baseline date. Even to the most informed people in the area who may have perhaps foreseen that Stanford would have to do seismic repairs to the hospitals, no one knew anything of the EXPANSION that would be requested, and it is the EXPANSION, not the seismic repairs that is causing the impacts. Even the title of the DEIR is wrong and distorted -- "Renewal and Replacement" indeed. If that were all that is to be done, the only impacts would come from the demolition/construction activities. It is the EXPANSION that causes the impacts and those cannot be said to have been foreseen by ABAG in 2005. The Project impacts must be added to the ABAG projections, not be said to be included in them. How wrong can you be??

As to issue (c) the DEIR reasons that because only 8% of the current employees of the Stanford Hospitals live in Palo Alto, a fact that was supplied by Stanford the Applicant, that only 8% of the additional 2,242 employees to be generated by the Project will live in Palo Alto. Now the City knows what the ABAG formula is for allocating Regional Housing Need because the City formally appealed to ABAG that the formula was unfair as applied to Palo Alto, and, as I read in the newspapers, ABAG did make a small adjustment. So the City knows the ABAG formula. Ask Staff whether ABAG will be satisfied if the City zones for additional housing for 8% of the 2,242 new employees. The ABAG 2015-2022 allocation for Palo Alto will be much much bigger than that. Everyone in the City knows it. Why does not the DEIR firm know it? ABAG is proceeding under State law, and the City Staff and the Council have treated that law as though it must be followed. What will be the environmental impact on the City of ABAG’s next allocation of Regional Housing Need? The Fiscal impact, though beyond the scope of an EIR, is even more important, and the Council has no guidance on either. After all this time, how can that be??

Please do whatever is necessary to get the correct guidance on these three issues before acting on the Application.

RECEIVED
JUL 22 2010
Department of Planning & Community Environment

Stanford University Medical Center Facilities Renewal and Replacement Final EIR — Written Comments and Responses
44. Tom Jordan (letter dated July 21, 2010)

44.1 The commentor states that the Population and Housing section is inadequate. As stated on page 2-53 of the Draft EIR, the estimated timeline for construction is approximately 12 years. The Draft EIR conservatively assumes completion of construction in 2021, which ensures that mitigation would be in place when warranted and not later. Also, while construction is assumed to be completed in 2021, projected occupancy of the proposed structures would not occur immediately after construction and would require time to ramp up. Consequently, the SUMC Project sponsors project full occupancy of the proposed structures by 2025. Table 2-13 of the Draft EIR shows a completion date of 2021 for the construction of the Stanford Hospital and Clinics structures.

44.2 The commentor asserts that Association of Bay Area Governments (ABAG) Projections 2005 did not consider the SUMC Project (since the application for the SUMC Project was submitted in 2007), and that the growth from the SUMC Project should not be considered to be part of the ABAG Projections 2005. The commentor is correct in indicating that the ABAG Projections 2005 were prepared prior to the proposal of the SUMC Project. However, as stated on page 3.13-2 of the Draft EIR, “ABAG Projections 2005 are used here to compare future population and employment growth from the SUMC Project. Projections 2005 are applied in lieu of the more recent ABAG Projections 2007 because both the City’s and the Santa Clara Valley Transit Authority (VTA’s) traffic model data were based on the ABAG Projections 2005 and the City has determined that the ABAG Projections 2005 are more consistent with the City’s current Comprehensive Plan’s goals and policies. In addition, the City has disputed the ABAG Projections 2007 as aggressive in comparison with the ABAG Projections 2005. The ABAG projections of 2005 and 2007 are similar through the year 2020.”

Numerous contacts with ABAG by City staff confirmed that ABAG was told of the SUMC’s and Stanford Shopping Center’s growth. In addition, in an email, City staff were told by ABAG “that (the SUMC Project) was included in their projections.”1 Also, Julie Caporgno, in response to such concern from then–Commissioner Burt, indicated that ABAG Projections of jobs are not specific to hospital projects, but that given ABAG’s approach, “I don’t think we are going to be penalized in the next period, but . . . it is very general.”2 Finally, by e-mail on December 19, 2008, from ABAG to Stanford, ABAG indicated that the ABAG forecast for jobs included assumptions for job growth at the Stanford Shopping Center and Stanford University Medical Center.3

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1 Roland Rivera, Senior Planner, City of Palo Alto, minutes of City of Palo Alto Planning and Transportation Commission public meeting, September 19, 2007.
2 Julie Caporgno, Chief Planning & Transportation Officer, City of Palo Alto, minutes of City of Palo Alto Planning and Transportation Commission public meeting, September 19, 2007.
3 Christie Riviere, Association of Bay Area Governments, email correspondence to Judy Chan, Stanford, December 19, 2008.
The above notwithstanding, since preparation of the analysis in the Draft EIR, ABAG has released its Projections and Priorities 2009. According to ABAG’s Regional Planner Jason Munkres, “As far as the Stanford Medical Center is concerned, we believe that our Projections 2009 forecast adequately reflects the growth associated with the Medical Center project.”

A quantified comparison of the SUMC Project’s indirect housing demand against household growth in jurisdiction sphere of influences, per ABAG Projections and Priorities 2009, is provided in Table 4-6 below for informational purposes. Similar to the analysis in the Draft EIR, Table 4-6 shows that the indirect housing demand from the SUMC Project would comprise a small percentage of projected housing growth between 2010 and 2025. It should be noted that Table 4-6 provides a more conservative analysis that the Draft EIR since it applies housing growth from 2010 through 2025 rather than 2005 through 2025.

<table>
<thead>
<tr>
<th></th>
<th>Residential Location of Existing SUMC Employeesa</th>
<th>2010 to 2025 Housing Growth per ABAG Projections and Priorities 2009b</th>
<th>SUMC Project Housing Demand in 2025</th>
<th>SUMC Project Housing Demand as Percent of Household Growth 2010-2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>Santa Clara County</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Palo Alto</td>
<td>8.0%</td>
<td>5,290</td>
<td>104</td>
<td>2.0%</td>
</tr>
<tr>
<td>Stanford University Campusc</td>
<td>1.1%</td>
<td>3,022c</td>
<td>14</td>
<td>0.5%</td>
</tr>
<tr>
<td>Mountain View</td>
<td>5.9%</td>
<td>6,040</td>
<td>77</td>
<td>1.3%</td>
</tr>
<tr>
<td>Los Altos and Los Altos Hills</td>
<td>1.5%</td>
<td>650</td>
<td>20</td>
<td>3.1%</td>
</tr>
<tr>
<td>Sunnyvale, Santa Clara, Cupertino</td>
<td>11.0%</td>
<td>18,260</td>
<td>143</td>
<td>0.8%</td>
</tr>
<tr>
<td>San Jose</td>
<td>15.5%</td>
<td>80,440</td>
<td>202</td>
<td>0.3%</td>
</tr>
<tr>
<td>Milpitas</td>
<td>2.1%</td>
<td>6,530</td>
<td>27</td>
<td>0.4%</td>
</tr>
<tr>
<td>Campbell, Los Gatos, Saratoga, (+Monte Sereno, Alum Rock)</td>
<td>2.3%</td>
<td>−2,460</td>
<td>30</td>
<td>1.2%</td>
</tr>
<tr>
<td>Gilroy, San Martin, Morgan Hill</td>
<td>0.7%</td>
<td>−6,791</td>
<td>9</td>
<td>0.1%</td>
</tr>
<tr>
<td>Subtotal</td>
<td>45.9%</td>
<td>130,683</td>
<td>626</td>
<td>0.5%</td>
</tr>
<tr>
<td>San Mateo County</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Menlo Park (+W. Menlo Park)</td>
<td>4.1%</td>
<td>1,630</td>
<td>53</td>
<td>3.3%</td>
</tr>
<tr>
<td>East Palo Alto</td>
<td>1.8%</td>
<td>1,520</td>
<td>24</td>
<td>1.6%</td>
</tr>
<tr>
<td>Atherton, Woodside, Portola Valley, Emerald Hills</td>
<td>0.9%</td>
<td>−684</td>
<td>12</td>
<td>1.8%</td>
</tr>
</tbody>
</table>

4 Jason Munkres, Regional Planner, Association of Bay Area Governments, electronic communication with Matthew Berke, PBS&J, October 13, 2010.
<table>
<thead>
<tr>
<th>Location</th>
<th>Residential Location of Existing SUMC Employees(^a)</th>
<th>2010 to 2025 Housing Growth per ABAG Projections and Priorities 2009(^b)</th>
<th>SUMC Project Housing Demand in 2025</th>
<th>SUMC Project Housing Demand as Percent of Household Growth 2010-2025</th>
</tr>
</thead>
<tbody>
<tr>
<td>Redwood City</td>
<td>5.5%</td>
<td>~5,090</td>
<td>72</td>
<td>1.4%</td>
</tr>
<tr>
<td>Belmont, San Mateo, San Carlos, and Foster City</td>
<td>6.2%</td>
<td>10,290</td>
<td>81</td>
<td>0.8%</td>
</tr>
<tr>
<td>Hillsborough, Burlingame, Millbrae</td>
<td>1.1%</td>
<td>3,300</td>
<td>14</td>
<td>0.4%</td>
</tr>
<tr>
<td>South San Francisco, Brisbane, Daly City, Colma, San Bruno</td>
<td>2.9%</td>
<td>12,210</td>
<td>38</td>
<td>0.3%</td>
</tr>
<tr>
<td>Half Moon Bay and Coastal (Pacifica, Montara, El Granada, La Honda, Pescadero, Loma Mar, Moss Beach)</td>
<td>1.7%</td>
<td>~2,325</td>
<td>22</td>
<td>0.9%</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>24.2%</strong></td>
<td><strong>37,049</strong></td>
<td><strong>316</strong></td>
<td><strong>0.9%</strong></td>
</tr>
<tr>
<td><strong>Alameda County</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fremont and Hayward</td>
<td>8.9%</td>
<td>14,940</td>
<td>116</td>
<td>0.8%</td>
</tr>
<tr>
<td>Newark, Union City, San Leandro, Castro Valley, San Lorenzo</td>
<td>6.1%</td>
<td>13,010</td>
<td>79</td>
<td>0.6%</td>
</tr>
<tr>
<td>Oakland, Berkeley, Alameda, Emeryville, Albany, Piedmont</td>
<td>1.0%</td>
<td>40,540</td>
<td>13</td>
<td>0.03%</td>
</tr>
<tr>
<td>Dublin, Pleasanton, Livermore, Sunol, and Mountain House</td>
<td>1.3%</td>
<td>~17,755</td>
<td>17</td>
<td>0.1%</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td><strong>19.3%</strong></td>
<td><strong>86,245</strong></td>
<td><strong>225</strong></td>
<td><strong>0.3%</strong></td>
</tr>
<tr>
<td><strong>San Francisco County</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contra Costa County</td>
<td>4.0%</td>
<td>40,120</td>
<td>52</td>
<td>0.1%</td>
</tr>
<tr>
<td>Marin, Napa, and Sonoma Counties</td>
<td>1.3%</td>
<td>49,650</td>
<td>17</td>
<td>0.03%</td>
</tr>
<tr>
<td>TOTAL IN BAY AREA REGION</td>
<td><strong>95.2%(^d)</strong></td>
<td><strong>372,570</strong></td>
<td><strong>1,241(^d)</strong></td>
<td><strong>0.33%</strong></td>
</tr>
<tr>
<td>Outside the Bay Area Region</td>
<td>4.8%</td>
<td>-</td>
<td>62</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>100%(^d)</strong></td>
<td><strong>1,303(^d)</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Sources:**

a. Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended; Tab 5, Table 5-5. See Appendix L.

b. Association of Bay Area Governments, Projections and Priorities 2009.


**Note:**

d. Individual percentages and numbers of units may not sum to the totals due to rounding.
As shown in Table 4-6, applying ABAG Projections 2009, the housing demand from the SUMC Project would still comprise a small percentage of the anticipated housing growth in the various Bay Area communities. There is also a negligible difference between the percentages when applying the Projections 2005 versus Projections 2009. Pages 3.13-12 through 3.13-13 of the Draft EIR demonstrates that the indirect housing demand generated by the SUMC Project, using ABAG Projections 2005, would be: 0.28 percent of the projected household growth in the Bay Area region, 0.5 percent of household growth in Santa Clara County, 0.9 percent of household growth in San Mateo County, 1.7 percent of the projected household growth within the City of Palo Alto, and 2.8 percent of housing growth in Menlo Park, from 2005 to 2025. For comparison purposes, as shown in Table 4-6, the indirect housing demand generated by the SUMC Project, using ABAG Projections 2009, would be: 0.33 percent of the projected household growth in the Bay Area region (a difference of 0.05 percent), 0.5 percent of household growth in Santa Clara County (no difference), 0.9 percent of household growth in San Mateo County (no difference), 2 percent of the projected household growth within the City of Palo Alto (a difference of 0.3 percent), and 3.3 percent of housing growth in Menlo Park (a difference of 0.5 percent), from 2010 to 2025. Table 3.13-8 in the Draft EIR, which uses ABAG Projections 2005, reflects similar results as calculated for ABAG Projections 2009.

44.3

The commentor indicates that ABAG will not accept that only 8 percent of SUMC employees would live in Palo Alto when developing the Regional Housing Needs Allocation (RHNA). As explained on page 3.13-1 of the Draft EIR, ABAG is the San Francisco Bay Area’s regional council of governments. ABAG forecasts a certain amount of population growth through its projections, and subsequently coordinates with various agencies and municipalities the required housing stock and infrastructure to support the projected growth. ABAG also prepares the RHNA, which is a State-mandated process used for determining how many housing units, including affordable units, that each community must plan to accommodate. The City of Palo Alto’s RHNA is not based solely on employment from SUMC facilities. The City’s RHNA is determined by ABAG based on broader considerations such as water and sewer capacity, available suitable land, distribution of household growth and market demand for housing, housing costs, employment, and proximity to transit.5

The RHNA requirements for the City of Palo Alto are included in Table 3.13-3 on page 3.13-5 of the Draft EIR. As shown in this table, the City has already issued building permits for 741 housing units and therefore has an unmet need of 2,119 housing units. This unmet need will be addressed in the Housing Element, as part of the Comprehensive Plan update. As discussed above, the SUMC Project would result in an indirect housing demand in the City of Palo Alto of 104 units.

The commentor requests that the City Council fully consider the additional information that includes the 2007 ABAG numbers, as discussed above in Response 44.3. The comment mainly pertains to the review process of the Draft EIR and consideration by City Council. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review process.

The commentor also questions the SUMC Project sponsors’ review of preliminary versions of the Draft EIR. The SUMC Project sponsors were initially allowed to review administrative drafts of the Draft EIR in order to provide technical expertise. The City permitted this review in recognition of the complexity of the SUMC Project and the need to verify the accuracy of information regarding hospital functions and the requirements of SB 1953. Although the SUMC Project sponsors had access to preliminary drafts, the public was also able to review the document prior to its publication. Early versions of the Draft EIR were available in 2009 at the Palo Alto City Library upon request. After early 2009, neither the SUMC Project sponsors nor the public had access to the updated drafts of the document until publication of the Draft EIR in May 2010. Preliminary review by the SUMC Project sponsors and the public did not influence the decision to use the ABAG Projections 2005 in the analysis contained in Section 3.13 of the Draft EIR, Population and Housing.

The commentor indicates that the analysis should not be based on 2025 occupancy. It is appropriate to base impacts on full operation and occupancy of the SUMC Project, which would occur in 2025, because this scenario captures the maximum impact from the SUMC Project. As indicated in the Draft EIR, construction of the SUMC Project would draw from local sources and thus would not trigger an increase in population.

The commentor objects to the use of ABAG 2005 Projections in the analysis. Please see Response 44.2.

The commentor indicates that ABAG will not accept that only 8 percent of SUMC employees would live in Palo Alto when developing the RHNA. Please see Response 44.3.
Mayor Burt and Honorable Members of the City Council:

As you know, I played a role in working with you all on this project over the past couple years. I would like to share some quick thoughts as I read through some of the DEIR.

Overall comments:

- We have noted many times that Palo Alto would not be Palo Alto without Stanford University, and that we are “joined at the hips” according to Dean Pizzo of the Medical School. That said, it is the project of the century and of a transformational scale. If we are to become “urban villages” in our density, we need urban village infrastructure and policies. The Medical Center is projected to have more than 12,000 employees, equivalent to the number of employees at the university proper, and fully half of the Stanford Research Park (SRP). The SRP as you might remember, led to the building of Oregon Expressway and continues to cause a huge tide of traffic in and out every day. Hopefully, the Medical Center is more compact and will have tight linkages to Caltrain and other regional transit.

- Besides the village concept, there are three other significant alternatives (free preservation, historic preservation and reduced intensity Alternative B) analyzed in the DEIR which meet most of both the city and Stanford’s goals perhaps with more open space and less impact on the environment. I hope the public and council study these alternatives seriously.

Specific comments:

- We have been long promised a 3-D model to help visualize the project from years ago. This would help us visualize and compare the alternatives as well.

- Concerned about the proposed modification of Policy L-8 of Comp Plan to exempt hospitals from non-residential cap. It doesn’t make policy sense to exempt the major employer in our area.

- Please keep the GO pass as a mitigation or benefit – it is a proven traffic reducer. Although it is difficult to be negotiating GO passes as Caltrain goes through its financial crisis, Stanford campus is already a pillar supporting Caltrain, and the new agreement will help provide some financial stability to Caltrain’s future. (p. 3.4-59: University currently has a total employment of approximately 11,000 and purchases 9,400 GO passes annually. It would seem that adding the built-out medical center will double the number of employees near the University Avenue station with GO passes and hopefully using Caltrain.)

- Given the conceptual goal of no net new trips, adding 2000 new parking spaces seems contradictory. Are all these new parking spaces for visitors?

- I was pleased to see the requirement for transit hubs to be built into the medical center.
45. Yoriko Kishimoto (letter dated July 15, 2010)

45.1 The commentor expresses support for an “urban village” and transit linkages as part of the SUMC Project. To address these issues, the Draft EIR analyzes a Village Concept Alternative in Section 5, Alternatives. This comment concerns the merits of the SUMC Project and its alternatives and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

45.2 The commentor expresses support for the Tree Preservation Alternative, the Historic Preservation Alternative, and Reduced Intensity Alternative B. This comment concerns the merits of the SUMC Project alternatives and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 regarding the merits of the SUMC Project and its alternatives.

45.3 The commentor requests 3-D models of the SUMC Project site plan. The SUMC Project sponsors displayed the existing 3-D models for the Main SUMC Site (the SHC and LPCH buildings) prior to the start of the City Council hearing on July 19, 2010. These 3-D models depicted the Tree Preservation Alternative, which is the SUMC Project sponsors’ preferred alternative. The SUMC Project sponsors and City staff were available to answer questions during the viewing period. Following the City Council hearing, the models were removed from the City Hall lobby since they are working models that are under development and subject to change.

Although it is not anticipated that supplementary 3-D models will be provided for public viewing, other forms of visual images that depict the SUMC Project are available. A computer simulation “fly through” of the site plans and visual simulations are available on the City website at: www.cityofpaloalto.org/sumc. In addition, the Draft EIR provides several visual simulations of the SUMC Project, as included in Section 3.3, Visual Resources.

Regarding the alternatives, as explained above, the 3-D models presented on July 19, 2010 and the computer simulations available at the City website illustrate the Tree Preservation Alternative. No site plans or simulations are available for the other alternatives proposed in the Draft EIR. Please refer to Master Response 10 for a discussion of SUMC Project design and other non-CEQA issues.

45.4 The commentor expresses concern about the proposed modification of Policy L-8 of the Comprehensive plan to exempt hospitals from a non-residential cap. The effects of the exemption are considered in the Draft EIR, mainly in Section 3.2, Land Use. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
45.5 The commentor requests that the GO Pass be retained as a mitigation measure. Although Caltrain is going through financial difficulties, the GO Pass mitigation can help provide some stability. Please refer to Master Response 1 for a detailed discussion on the effectiveness of the GO Pass.

45.6 The commentor states that given the conceptual goal of No Net New Trips, and adding 2,000 parking spaces seems contradictory. The commentor questions if these spaces are for visitors. The SUMC Project proposes to add 2,051 additional parking spaces which are based on automobile use for the SUMC expansion at current modal split percentages. If GO Passes were purchased for SUMC employees, the existing auto mode split of 77 percent would be reduced to 64.5 percent thereby eliminating the need for about 720 parking spaces (as stated in Section 4.8 of the Transportation Impact Analysis, Appendix C of the Draft EIR). The number of net new parking spaces to be provided could be about 1,331 spaces.

45.7 The commentor expresses support for transit hubs as part of the SUMC Project. Please see Staff-Initiated Change 1 for a revised transit analysis and revision to mitigation involving enhanced bus stops.

45.8 The commentor expresses support for the SUMC Project. This comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
In regards Stanford University’s Medical Facilities Renewal and Replacement DEIR which you and Palo Alto City Councilmembers will be reviewing at a July 26 Council Meeting, rather belatedly I would submit following concerns:

- Landscape plantings were evidently going to be obtained from a southern California native plant nursery but under separate cover I will submit Actaea’s native plant species list appropriate for this San Francisquito watershed. Palo Alto Foothills Park green plantings will have better survival capability for Children’s Hospital proposed Discovery, Emerald, Healing, Rainbow, and Rain gardens, and nature pathway and entry court.

- There is confusion on plans and in text of DEIR as to which protected significant trees, especially oaks, are to be retained, transplanted or lost to development. On Plans ARB 011, #478, 479, 608, 425, and 333 are said to remain, but this is not guaranteed elsewhere. In text it states 71 protected trees will be removed, of which 23 are significant. While on ARB 009 plans, 19 protected trees are listed as ‘good candidates for transplanting’ and yet they are sizable oaks with diameters of 12.5 to 33.3 and 41.9 and extensive canopies. One suggested place for replanting is above garage in center strip of Pasteur Drive which is far from ideal. It would be reassuring to have a work session with planners to establish tree preservation criteria. Alternative tree loss mitigation would be to establish oak conservation acreage in perpetuity on western campus land.

- Though EDAW consultants assure that harvester rainwater and subsurface reclaimed water will be used for irrigation on hospital landscaping, this is only a small component of Stanford University campus irrigation. In the California legislature at present is a bill that would mandate 50% use of recycled water by the year 2030 so it would be good to see an integrated management plan for irrigation of all proposed campus development, to see what vegetation would best survive and perhaps thrive on continual recycled water use.

- In the water supply segment of this DEIR I can only find data on City of Palo Alto water use and SFPUC supply allocation. Stanford University has its own SFPUC allocation, and historical and projected use yet this is not in DEIR? Is not this a critical deficiency? In 2007 SFPUC documentation of present and future water demands, Stanford’s 2030 projected demand was up 76%, from 3.03 mgd to 4.20 mgd, and that did not include employment growth, only residential student and faculty, medical school, academic occupants, commercial space and construction projects. You have at least two former council members who are expert on SFPUC water issues so do hope you are hearing from them on this matter. There is also “lake water” irrigation of campus which reflect diversions from Los Trancos and San Francisquito Creeks of 1.50 mgd. I believe, and this is concern as these streams should be supply for underground aquifer in unconfined zone. Lake Lagunita was prime percolation pond but does not appear to be managed for that purpose anymore?

- Hydrology and wastewater sections need to be updated in regards to base data. San Francisquito Creek hundred year flood, or 1% event flow is now estimated by COE at 9400 cfs rather than at 7600 cfs which was high flow of February 2-9, 1998 storm which overbanked San Francisquito Creek to flood downtown Palo Alto and neighborhoods. Runoff down Stanford Avenue also flooded the basement of Stanford’s Green Library. Incidence of overland flow from San Francisquito Creek and watershed needs to be re-evaluated for the DEIR. This increase in estimated flows and in intensity of storm events by COE, affects stormwater drain capacity, as well. Can this continue to accommodate 10 year events? Will redesign of outfalls to San Francisquito Creek mitigate for increase in stormwater loading? These are aspects of hydrology in need of further DEIR review.

- The height and size of the new hospital building is a concern in regards aesthetics, but also I was unable to find reference as to an increase in fire fighting capability that will entail more sophisticated equipment and supplemental staff. There should be an analysis of toxic chemicals incorporated in the structure and stored on site in routine hospital operation. What additional volume will there be in regards medical waste?

- The underflow of groundwater is said to be at 30 feet so it is important that proposed deep basements and garages do not dig deeper and that electrical equipment is installed high and dry above ground. Not sure how this affects elevator shafts. This is doubly important in consideration of San Francisquito Creek’s sheet flows.

- The increase in traffic needs to evaluate nitrogen deposition on open space areas of biological importance such as Almaden Foothills Park grown plantings will have better survival capability for Children’s Hospital proposed Discovery, Emerald, Healing, Rainbow, and Rain gardens, and nature pathway and entry court.

- In geology section there is no mention of the Stanford fault. Was it the San Andreas Fault or Stanford fault that caused such major damage to Stanford University buildings in 1906?

- I apologize for getting this to you so late. Was unable to find the DEIR in Palo Alto libraries and finally got a loaner from your planning department on Wednesday. Then I was called City Creek for e-mail address for submittal of comments finds closed all Friday. You have a challenge in this DEIR document. Ahad I will be out of town on Monday so will have to read about this meeting in the minutes.

Libby Lucas, 174 Yerba Santa Ave., Los Altos, CA 94022

46.1 The commentor suggests plant species for the SUMC Sites. The specific landscape requirements and plant species to be included at the SUMC Sites are outside the scope of CEQA and therefore are not included in the Draft EIR. Proposed landscaping is generally described on pages 3.3-34 and 3.3-37 of the Draft EIR, Section 3.3, Visual Quality. The Draft EIR describes proposed open spaces, walkways, lighting, vegetation, and other decorative features, but does not list the specific species of plants to be installed.

However, the SUMC Project draft Design Guidelines presents proposed tree species and their typical planting patterns that would be used to contribute to the visual quality of the SUMC Sites. Appropriate plant species would be included at the SUMC Sites as advised by a qualified arborist and street tree replacement will be consistent with the City of Palo Alto Public Works Department Street Tree Management Plan. As such, street tree replacement shall include native species to the maximum extent possible and appropriate species include California black oak, red maple, toyon, and flax leaf paperbark. The Architectural Review process would include consideration of whether the SUMC Project adequately incorporates landscaping. Please refer to Master Response 10 for a discussion of non-CEQA issues.

46.2 The commentor questions the inconsistency between the number of Protected Trees to be retained or removed as outlined in the Draft EIR versus those outlined in the site plans prepared by the SUMC Project sponsors. Since the publication of the Draft EIR, the number of Protected Trees to be removed and retained has been corrected. Refer to Staff-Initiated Change 6 for the corrected Protected Tree numbers.

In addition, the commentor questions the ability to relocate large Protected Trees and questions the location of the potential tree relocation zone in the median of Pasteur Drive. Mitigation Measure BR-4.3, as presented on page 3.9-27 of the Draft EIR and revised in Staff-Initiated Change 6, would require the preparation of a Tree Relocation and Maintenance Plan (TRMP). The TRMP should evaluate the feasibility of moving the Protected Trees to an appropriate location on site. Feasibility would consider current site and tree conditions, a tree’s ability to tolerate moving, relocation measures, optimum needs for the new location, aftercare, irrigation, and other long-term needs. Although the commentor refers to tree protection zones in SUMC Project designs, as presented to the Architectural Resources Board (ARB), it is important to note that these designs are preliminary and subject to revisions. The tree relocation zones will not be determined until the completion of the TRMP, pursuant to Mitigation Measure BR-4.3.

46.3 The commentor requests an integrated management plan for irrigation of all proposed campus development. The SUMC Project sponsors considered a greywater system to be used for irrigation under the SUMC Project. However, based on discussions with the Office of Statewide Health Planning and Development (OSHPD), hospitals are not allowed
to use greywater systems. As such, greywater systems would not be installed under the SUMC Project.\footnote{Mark Tortorich, Vice President, Design and Construction, Stanford University Medical Center, Planning and Transportation Commission Hearing, June 30, 2010.} The Draft EIR analyzed the SUMC Project as proposed. Therefore, the water demand analysis did not consider the use of a greywater system. The identified legislative bill that would mandate 50 percent use of recycled water by the year 2030 is under consideration and does not apply to the SUMC Project. Please refer to Master Response 10 for a discussion of non-CEQA issues.

46.4 The commentor notes that Stanford University receives a separate water allocation from SFPUC and questions why this was not addressed in the Draft EIR. Stanford University does operate as a water service provider and has an agreement with the San Francisco Public Utilities Commission (SFPUC) to receive potable water. However, the SUMC Sites operate separately from Stanford University and are located within the service jurisdiction of the City of Palo Alto, as shown in the service area boundary from the City of Palo Alto 2005 Urban Water Management Plan. The Draft EIR water supply discussion utilizes information from the August 2009 Water Supply Assessment for the SUMC Project (Draft EIR Appendix M) and summarized the findings from the report in the Utilities sections. Page 1-5 of the Water Supply Assessment states that the “City of Palo Alto Utilities (CPAU) is the public water system that serves the City of Palo Alto and the SUMC Sites.” As such, the Draft EIR addresses the supply and demand issues as they pertain to the City of Palo Alto, not the Stanford University water service provider.

46.5 The commentor suggests that the hydrology and wastewater sections should be updated with regard to base flow data from the United States Army Corp of Engineers (USACE), which indicates higher flow rates for the one-percent flow event in San Francisquito Creek. The commentor also suggests that the incidence of overland flow be re-evaluated in the Draft EIR, including the effect on storm drain system capacities and questions whether the 10-year storm event can continue to be accommodated and if redesign of outfalls to San Francisquito Creek would be implemented to mitigate for increases in stormwater loading.

In accordance with CEQA, the Draft EIR analysis is based on potential SUMC Project impacts as related to existing conditions. Regardless of the existing flood flow rates in San Francisquito Creek or storm drain system capacities, if the SUMC Project would increase runoff to these systems, then the impact could be potentially significant or significant. If the SUMC Project does not increase flow rates, then, even if the current system experiences flooding, the SUMC Project would not affect flooding. The City cannot speak to the potential for higher San Francisquito Creek flood flow rates suggested by the commentor, because no reference supporting this contention has been provided. However, the latest FEMA map revision (May 18, 2009) shows that the one-percent annual chance of flooding (100-year flood event) is still contained within the San Francisquito Creek channel upstream of El Camino Real. The Draft EIR analysis fully identifies and discusses
potential SUMC Project effects on flooding and storm drain system capacity exceedances. No redesign of outlets to San Francisquito Creek would be implemented to mitigate increased flow rates, because the SUMC Project would not increase flow rates.

The Draft EIR analysis does not rely on a specific flow rate (e.g., 7,600 cfs or 9,400 cfs) for identifying potential flood effects from the SUMC Project; rather, in accordance with CEQA, the Draft EIR analysis evaluates whether or not the SUMC Project would likely increase flow rates to the off-site systems. Flow rates to San Francisquito Creek or the storm drain system could increase because of changes in drainage patterns, such as increased impervious surface or substantial alterations in flow conveyance (e.g., installing a storm drain system in an area dominated by overland runoff). As noted in the Draft EIR, on page 3.11-40 the off-site storm drain systems would not be altered and the on-site storm drain system and drainage characteristics would not be substantially altered. As presented on page 3.11-2, increasing impervious surfaces within an area would not greatly affect flood flows (one percent annual chance of flooding) within San Francisquito Creek because, during these events, rainfall saturates even natural, pervious surfaces and renders them effectively impervious. The Draft EIR states that the SUMC Project would actually increase the amount of effective pervious surfaces, not impervious surfaces, on the SUMC Sites by seven percent. Additionally, a no net-increase in directly-connected impervious surfaces is sufficient to prevent increases in runoff for the 2-year to 10-year storm events, in accordance with the Municipal Regional Permit. The Draft EIR further notes that the Public Works Department requires that existing drainage patterns must be maintained. Therefore, with no substantial alterations in drainage patterns on the SUMC Sites and no increases in effective impervious surfaces, the SUMC Project would not increase runoff to San Francisquito Creek or the storm drain systems and the impact level of significance is less than significant.

46.6 The commentor is concerned about the increased height and size of the SUMC Project and how that would impact fire fighting capability. As explained in Impact PS-1, on pages 3.14-12 through 3.14-14, the SUMC Project might require an increased level of fire and emergency services, but not to the degree that would result in the construction of new buildings. These additional services would have an impact on the Palo Alto Fire Department (PAFD) itself; however, under CEQA, this is not considered a physical environmental impact. As stated on page 3.14-13, the impacts on the PAFD include the need for a new ladder to serve the increased building heights at the SUMC Sites and the need for three additional full time employees.

Improvement measures are proposed in the Draft EIR to reduce the impacts on the PAFD, as presented on page 3.14-14. Since the impacts from the SUMC Project are not large enough to trigger the construction of new facilities, which would result in a significant impact, mitigation measures are not required through the environmental review process. However, the City could encourage the SUMC Project sponsors to implement these improvement measures or consider imposing them as Conditions of Approval. Therefore,
for the purposes of CEQA review in the Draft EIR, the improvement measures are not mandated, but encouraged.

One of the improvement measures, as outlined on page 3.14-14 of the Draft EIR, includes providing the PAFD with a 100-foot ladder truck to replace the existing 75-foot ladder truck. The 130-foot SHC Hospital towers would be significantly taller than the existing buildings at the SUMC Sites. Therefore, in order for the PAFD to reach the upper floors of the buildings in the event of an emergency, a new ladder would need to be purchased. Although more space would be needed at the fire station to house a 100-ladder truck, the PAFD has looked at the apparatus housing capabilities at the fire stations and has determined that the current facilities are capable of handling any new equipment.²

The other improvement measure would increase the 12-hour Medical unit to a 24-hour unit and would add three full-time employees. Although additional staff would be needed as a result of the SUMC Project, the PAFD acknowledges that the existing fire stations are capable of handling the increase in employment.³ Therefore, the need for new fire facilities would not be triggered and a less-than-significant physical environmental impact would occur.

46.7 The commentor questions what toxic materials would be used and stored on the SUMC Sites and additional medical waste would be stored at the SUMC Sites as a result of the SUMC Projects. The existing and projected amount of hazardous chemicals at the SUMC Sites is disclosed in Table 3.12-6 on page 3.12-29 of the Draft EIR. As discussed on pages 3.12-28 through 3.12-36 of the Draft EIR under Impact HM-1, the SUMC Project would not substantially increase exposure to hazardous materials use, handling, and disposal during operation, resulting in a less-than-significant impact.

The impacts of hazardous waste generation and disposal are discussed under Impact HM-4 on pages 3.12-41 through 3.12-46 of the Draft EIR. The Hazardous Materials section of the Draft EIR concludes that the SUMC Project would not substantially increase exposure risk related to hazardous waste generation. The existing and future annual hazardous chemical waste volumes at the SUMC Sites are presented in Tables 3.12-9 and 3.12-10 on page 3.12-43 of the Draft EIR. The existing and projected volumes of biohazardous materials treated at the SUMC Sites are presented in Table 3.12-11, page 3.12-45 of the Draft EIR. Please refer to Section 3.12 of the Draft EIR, Hazardous Materials, pages 3.12-28 through 3.12-36 and pages 3.12-41 through 3.12-46, for a complete discussion and analysis of the additional medical wastes to be used and stored at the SUMC Sites.

The commentor notes that groundwater is roughly 30 feet below ground surface and that it is important that proposed underground structures are not located below the groundwater level. The commentor also notes that this is particularly important because of San Francisquito Creek sheet flows. In accordance with CEQA, the Draft EIR analysis is based on potential SUMC Project impacts as related to existing conditions.

The commentor’s specific concerns regarding San Francisquito Creek sheet flows are unclear. If concerns regard the potential for San Francisquito Creek over-topping channel banks and flooding adjacent areas during a flood event, as noted in the Draft EIR on page 3.11-7, San Francisquito Creek would not flood the SUMC Sites in the event of a one-percent annual chance of flood. If the commentor is concerned about general sheet flow runoff in the San Francisquito Creek watershed, the Draft EIR notes on page 3.11-41 that the City of Palo Alto Public Works Department requires that drainage patterns, including runoff from adjacent properties, must be maintained. In addition, proper conveyance to the nearest storm drain system must be shown. As presented in Section 3.11, page 3.11-2 of the Draft EIR, increasing impervious surfaces within an area would not greatly affect flood flows (one percent annual chance of flooding) within San Francisquito Creek. During these events, rainfall saturates natural pervious surfaces and renders them effectively impervious. The analysis also notes that the SUMC Project would actually increase the amount of effective pervious surfaces, not impervious surfaces, on the SUMC Sites by seven percent, as explained on page 3.11-41 of the Draft EIR. As such, overland runoff would be adequately routed through a storm drain system to San Francisquito Creek and the SUMC Project would not increase runoff to San Francisquito Creek or off-site storm drain systems. Overall, overland runoff in the San Francisquito Creek system would not be substantially affected nor would it affect the SUMC Project.

As presented on page 3.11-18 of the Draft EIR, the depth to groundwater at the SUMC Site is more than 30 feet below ground surface. Because fluctuations in groundwater levels can occur, the design groundwater depth is recommended to be 30 feet below ground surface. The Draft EIR notes excavations and installation of underground structures more than 40 feet below ground surface would occur. These deep excavations could result in excursion into the local groundwater table. However, this would require flood-proofing of underground structures where they extend below the design groundwater depth of 30 feet below ground surface or measured groundwater depths. Flood-proofing practices would prevent underground structures from groundwater-induced flooding and potential flood impacts associated with deep excavations would be less than significant.

The commentor requests an analysis of nitrogen deposition from increased SUMC Project traffic on open space areas such as the Jasper Ridge Biological Preserve and Edgewood Park. As stated on page 3.4-73 of the Draft EIR, the SUMC Project would not add a significant amount of traffic to the local freeways, resulting in less-than-significant freeway impacts. Jasper Ridge is located approximately one mile to the west of I-280 and immediately south of the western portion of Sand Hill Road (a segment that would not be
impacted by the SUMC Project). Since the SUMC Project would result in a negligible amount of traffic on freeways relative to existing conditions, the SUMC Project would not substantially contribute to nitrogen deposition impacts at the Jasper Ridge Biological Preserve. Similarly, the SUMC Project would not substantially contribute to nitrogen deposition impacts at the Edgewood Park, located immediately adjacent to the eastern portion of I-280 in Redwood City.

46.10 The commentor requests an analysis of water quality impacts to adjacent reservoirs from increased SUMC Project traffic on I-280. As explained in Response 46.9, above, the SUMC Project would not add a significant amount of traffic to the local freeways, resulting in less-than-significant freeway impacts. The Crystal Springs Reservoir and the San Andreas Reservoir are located immediately adjacent to I-280. However, the small amount of traffic that would be added to I-280, resulting in less-than-significant traffic impacts from the SUMC Project, would not substantially affect the water quality of these reservoirs.

46.11 The commentor questions if the increase in traffic would negate any aspects of the PAFD evacuation plan. A discussion of the adopted emergency response and evacuation plans is included under Impact HM-10 in Section 3.12 of the Draft EIR, Hazardous Materials, pages 3.12-48 through 3.12-50. The SUMC Project would have a significant impact on emergency access routes due to truck traffic during construction and would degrade the level of service (LOS) at several intersections during operation. However, Mitigation Measure HM-10.1 requires advanced coordination with the City of Palo Alto on construction routes. When combined with Mitigation Measures TR-1.1, TR-1.4 through TR-1.6, and TR-1.8, presented in Section 3.4, Transportation, these measures would reduce the significant impacts to a less-than-significant level by implementing construction-period traffic controls. In addition, Mitigation Measure TR-9.1, also presented in Section 3.4, would involve the installation of emergency vehicle traffic signal priority (OptiCom) at all intersections significantly impacted by the operations of the SUMC Project. Therefore, implementation of these measures would reduce impacts on emergency evacuation and response plans to less than significant.

46.12 The commentor states that the Draft EIR fails to mention the Stanford fault. This statement is incorrect. The Draft EIR discusses the active and inactive faults in the area immediately surrounding the SUMC Sites. As stated on page 3.10-10 of the Draft EIR, the only known active fault in the area is the San Andreas fault system, which is about 4.2 miles to the southwest of the SUMC Sites. The Stanford fault, along with the other faults in the immediate vicinity, does not show evidence for recent surface displacements and therefore is considered inactive. The earthquake that resulted in significant damage throughout the Bay Area in 1906 was the San Andreas Fault. For a map of the geologic features in the vicinity of the SUMC Sites, which includes the location of the Stanford fault, see Figure 3.10-2 on page 3.10-11 of the Draft EIR.
**PLANT LIST for ACTERRA NATIVE PLANT NURSERY**

**Definitions:** The following definitions for watering apply to established plants. All plants in containers require regular watering, preferably in the cool of the morning. Plants in the ground need deep watering for the first two summers in order to establish their deep root systems. Avoid frequently shallow watering.

**Irrigate:** Needs regular summer water once or twice a week depending on temperature and planting environment.

**Deep:** Water 20 to 30 minutes every 10-30 days during summer depending on temperature. In some situations, an established plant may do well without any additional water.

**Fall:** Withhold water during the summer dormancy, begin watering infrequently in early fall.

**STBL:** A good plant for bank stabilization.

**GCVR:** A good ground cover plant.

**DRN:** Requires good drainage.

**ANN:** Annual.

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<th>Botanical Name</th>
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8/6/2010
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8/6/2010
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<td>Asteraceae</td>
<td>Deep, Coastal strand</td>
</tr>
<tr>
<td>Adenostoma fasciculatum</td>
<td>Charnise</td>
<td>Rosaceae</td>
<td>Deep, DRN; Chaparral</td>
</tr>
<tr>
<td>Arctostaphyllum calosus</td>
<td>Buckeye</td>
<td>Hippocastaneae</td>
<td>Deep, Slopes, canyons, stream banks</td>
</tr>
<tr>
<td>Alnus rubra</td>
<td>Red Alder</td>
<td>Betulaceae</td>
<td>Deep, STBL; stream banks</td>
</tr>
<tr>
<td>Acer macrophyllum</td>
<td>Bigleaf Maple</td>
<td>Aceraceae</td>
<td>Deep, Stream banks, canyons</td>
</tr>
<tr>
<td>Acer negundo</td>
<td>Box Elder</td>
<td>Aceraceae</td>
<td>Deep</td>
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8/6/2010
<table>
<thead>
<tr>
<th>Scientific Name</th>
<th>Common Name</th>
<th>Family</th>
<th>Habitat Details</th>
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<tbody>
<tr>
<td><em>Arbutus menziesii</em></td>
<td>Madrone</td>
<td>Ericaceae</td>
<td>Deep Coniferous, oak forests</td>
</tr>
<tr>
<td><em>Arctostaphylos andersonii</em></td>
<td>Santa Cruz Manzanita</td>
<td>Ericaceae</td>
<td>Deep DRN: Open areas</td>
</tr>
<tr>
<td>*Arctostaphylos crustacea var.</td>
<td>Santa Cruz Mountains</td>
<td>Ericaceae</td>
<td>Deep DRN: chaparral</td>
</tr>
<tr>
<td><em>Arctostaphylos crustacea</em></td>
<td>Brittle Leaf Manzanita</td>
<td>Ericaceae</td>
<td>Deep DRN: chaparral</td>
</tr>
<tr>
<td><em>Arctostaphylos glutinosus</em></td>
<td>Schreibers Manzanita</td>
<td>Ericaceae</td>
<td>Deep DRN: chaparral</td>
</tr>
<tr>
<td><em>Arctostaphylos montanaensis</em></td>
<td>Montara Mt Manzanita</td>
<td>Ericaceae</td>
<td>Deep DRN: chaparral</td>
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<tr>
<td><em>Arctostaphylos regismontana</em></td>
<td>Kings Mt Manzanita</td>
<td>Ericaceae</td>
<td>Deep DRN: chaparral</td>
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<tr>
<td><em>Baccharis pilularis</em></td>
<td>Coyote brush</td>
<td>Asteraceae</td>
<td>Deep GCVR; oak woodland</td>
</tr>
<tr>
<td><em>Ceanothus thyrsiflorus</em></td>
<td>Blue Blossom</td>
<td>Rhamnaceae</td>
<td>Deep Wooded slopes and canyons</td>
</tr>
<tr>
<td><em>Ceanothus oliganthus var.</em></td>
<td>Jimbrush</td>
<td>Rhamnaceae</td>
<td>Deep DRN: dry slopes</td>
</tr>
<tr>
<td><em>Cercocarpus betuloides</em></td>
<td>Mountain Mahogany</td>
<td>Rosaceae</td>
<td>Deep DRN: chaparral, woodland</td>
</tr>
<tr>
<td><em>Comus glabrata</em></td>
<td>Brown Dogwood</td>
<td>Cornaceae</td>
<td>Deep Stream banks</td>
</tr>
<tr>
<td><em>Comus sericea</em></td>
<td>Western Creek Dogwood</td>
<td>Cornaceae</td>
<td>Deep STBL; forest</td>
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<tr>
<td><em>Corylus californica</em></td>
<td>California Hazelnut</td>
<td>Betulaceae</td>
<td>Deep STBL; forest</td>
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<tr>
<td><em>Dendromecon rigidum</em></td>
<td>Bush Poppy</td>
<td>Papaveraeae</td>
<td>Deep DRN: chaparral</td>
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<tr>
<td><em>Dirca occidentalis</em></td>
<td>Western Leatherwood</td>
<td>Thymelaeaeaeae</td>
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<tr>
<td><em>Eriodictyon californicum</em></td>
<td>Yerba Santa</td>
<td>Hydrophyllaceae</td>
<td>Deep DRN:STBL; chaparral</td>
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<td><em>Eriogonum fasciculatum</em></td>
<td>California Buckwheat</td>
<td>Polygonaceae</td>
<td>Deep Dry slopes</td>
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<tr>
<td><em>Eriogonum giganteum</em></td>
<td>Island Buckwheat</td>
<td>Polygonaceae</td>
<td>Deep Dry slopes</td>
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<tr>
<td><em>Euonymus occidentalis</em></td>
<td>Burning Bush</td>
<td>Celastraceae</td>
<td>Deep Streambanks</td>
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<td><em>Fraxinus latifolia</em></td>
<td>Oregon Ash</td>
<td>Oleaceae</td>
<td>Deep Canyons, stream banks</td>
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<tr>
<td><em>Fremontodendron californicum</em></td>
<td>FlannelBush</td>
<td>Serrulaceae</td>
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<td><em>Garrya elliptica</em></td>
<td>Coast Silkfassell</td>
<td>Garryaceae</td>
<td>Deep Chaparral, woodland</td>
</tr>
<tr>
<td><em>Gaultheria shallon</em></td>
<td>Salal</td>
<td>Ericaceae</td>
<td>Deep GCVR; forest margins</td>
</tr>
<tr>
<td><em>Heteromeles arbutilloides</em></td>
<td>Toyon</td>
<td>Rosaceae</td>
<td>Deep Chaparral, oak woodland</td>
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<tr>
<td><em>Juglans californica</em></td>
<td>California Black Walnut</td>
<td>Juglandaceae</td>
<td>Deep Chaparral, oak woodland</td>
</tr>
</tbody>
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---

**Additional Information:**

*Keckilla cordifolia* | Climbing Penstemon | Scrophulariaceae | Deep | Chaparral  
*Lithocarpus densiflorus* | Tanbark Oak | Fagaceae | Deep | Redwood forest  
*Lonicer a hispida* | Hairy Honeysuckle | Caprifoliaceae | Deep | STBL; canyons, stream banks  
*Lonicer a involucrata* | Twinberry Honeysuckle | Caprifoliaceae | Irrigate | Moist areas  
*Lotus scoparius* | Deerweed | Fabaceae | Deep | STBL; chaparral  
*Malocharnus arcuatus* | Arcuate Bush Mallow | Malvaceae | Deep | Chaparral  
*Myrica californica* | Wax Myrtle | Myricaceae | Irrigate | Redwood forest  
*Oemleria cerasiformis* | Oso Berry | Rosaceae | Deep | Chaparral  
*Physocarpus capitatus* | Ninebark | Rosaceae | Irrigate | Moist banks  
*Prunus ilicifolia* | Hollyleaf Cherry | Rosaceae | Deep | Canyons, woodland  
*Pseudotsuga menziesii* | Douglas Fir | Pinaceae | Deep | Mixed evergreen forest  
*Quercus agrifolia* | Coast Live Oak | Fagaceae | Deep | Valleys, woodland  
*Quercus kelloggii* | Black Oak | Fagaceae | Deep | Chaparral, woodland  
*Quercus lobata* | Valley Oak | Fagaceae | Deep | Slopes, valleys  
*Quercus parvula var. shrevei* | Shreve Oak | Fagaceae | Deep | Woodland  
*Quercus wislizenii* | Interior Live Oak | Fagaceae | Deep | Chaparral, oak woodland  
*Populus fremontii* | Fremont Cottonwood | Salicaceae | Irrigate | STBL; stream banks  
*Rhamnus californica* | Coffeeberry | Rhamnaceae | Deep | Chaparral, woodland  
*Rhamnus crocea* | Redberry | Rhamnaceae | Deep | Chaparral, woodland  
*Rhiz intignifolia* | Lemonadberry | Anacardiaceae | Deep | Chaparral  
*Ribes aureum* | Golden Currant | Grossulariaceae | Irrigate | Many habitats  
*Ribes californicum* | Hillside gooseberry | Grossulariaceae | Deep | Woodlands, chaparral  
*Ribes divaricatum* | Stagelberry | Grossulariaceae | Deep | Stream banks  
*Ribes malvaceum* | Chaparral Currant | Grossulariaceae | Deep | Chaparral, oak woodland  
*Ribes menzeisii* | Canyon Gooseberry | Grossulariaceae | Deep | Forest  
*Ribes sanguineum* | Pinkflower Currant | Grossulariaceae | Deep | Many habitats  
*Ribes speciosum* | Fuchsia-flower Currant | Grossulariaceae | Deep | Chaparral  
*Ribes viburnifolium* | Evergreen Currant | Grossulariaceae | Deep | Chaparral, canyon forests  

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8/6/2010
<table>
<thead>
<tr>
<th>Species</th>
<th>Common Name</th>
<th>Family</th>
<th>Habitat</th>
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<tbody>
<tr>
<td>Rosa californica</td>
<td>California Wild Rose</td>
<td>Rosaceae</td>
<td>Deep STBL; stream banks</td>
</tr>
<tr>
<td>Rosa gymnocarpa</td>
<td>Wood Rose</td>
<td>Rosaceae</td>
<td>Deep Forest</td>
</tr>
<tr>
<td>Rubus leucodermis</td>
<td>Western Raspberry</td>
<td>Rosaceae</td>
<td>Deep Forest</td>
</tr>
<tr>
<td>Rubus parviflorus</td>
<td>Thimbleberry</td>
<td>Rosaceae</td>
<td>Deep Woodland</td>
</tr>
<tr>
<td>Rubus spectabilis</td>
<td>Salmonberry</td>
<td>Rosaceae</td>
<td>Deep STBL; streamsides</td>
</tr>
<tr>
<td>Rubus ursinus</td>
<td>Wild Blackberry</td>
<td>Rosaceae</td>
<td>Deep STBL; shrubland, stream banks</td>
</tr>
<tr>
<td>Salix laevigata</td>
<td>Red Willow</td>
<td>Salicaceae</td>
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<td>Salix lucida var. lasiandra</td>
<td>Shinning Willow</td>
<td>Salicaceae</td>
<td>Deep STBL; stream banks</td>
</tr>
<tr>
<td>Salix lasiolepis</td>
<td>Arroyo Willow</td>
<td>Salicaceae</td>
<td>Deep STBL; springs, stream banks</td>
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<tr>
<td>Salix sitchensis</td>
<td>Sitka Willow</td>
<td>Salicaceae</td>
<td>Deep STBL; stream banks</td>
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<td>Salvia apiana</td>
<td>White Sage</td>
<td>Lamiaceae</td>
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<tr>
<td>Salvia thymifolia</td>
<td>Black Sage</td>
<td>Lamiaceae</td>
<td>Deep Chaparral</td>
</tr>
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<td>Sambucus mexicana</td>
<td>Blue Elderberry</td>
<td>Caprifoliaceae</td>
<td>Deep Stream banks, forest</td>
</tr>
<tr>
<td>Solanum umbelliferum</td>
<td>Blue Witch</td>
<td>Solanaceae</td>
<td>Deep Woodland</td>
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<td>Toxicodendron diversilobum</td>
<td>Poison Oak</td>
<td>Anacardimnaceae</td>
<td>Deep Canyons, chaparral</td>
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<td>Umbellularia californica</td>
<td>California Bay</td>
<td>Lauraceae</td>
<td>Deep Canyons, valleys</td>
</tr>
<tr>
<td>Vaccinium ovatum</td>
<td>Evergreen Huckleberry</td>
<td>Ericaceae</td>
<td>Deep Forest edges</td>
</tr>
<tr>
<td>Vengasia carpesioides</td>
<td>Canyon Sunflower</td>
<td>Asteraceae</td>
<td>Deep STBL; canyons</td>
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<tr>
<td>Vaccinium ovatum</td>
<td>Evergreen Huckleberry</td>
<td>Ericaceae</td>
<td>Deep Forest edges</td>
</tr>
</tbody>
</table>
47. Libby Lucas (letter dated July 23, 2010)

47.1 The commentor submitted an Acterra plant list. The specific landscape requirements and plant species to be included at the SUMC Sites are outside the scope of CEQA and therefore are not included in the Draft EIR. Proposed landscaping is generally described on page 3.3-34 through 3.3-35 of the Draft EIR, Section 3.3, Visual Quality. The Draft EIR describes proposed open spaces, walkways, lighting, vegetation, and other decorative features, but does not list the specific species of plants to be installed.

However, the SUMC Project design guidelines present proposed tree species and their typical planting patterns that would be used to contribute to the visual quality of the SUMC Sites. Appropriate plant species would be included at the SUMC Sites as advised by a qualified arborist and tree replacement for removal of public street trees would be consistent with the City of Palo Alto Public Works Department Street Tree Management Plan. As such, street tree replacement shall include native species to the maximum extent possible and appropriate species include California black oak, red maple, toyon, and flax leaf paperbark. The Architectural Review process would include consideration of whether the SUMC Project adequately incorporates landscaping. Please refer to Master Response 10 for a discussion of non-CEQA issues.
Catholic and San Mateo County Transit District (SamTrans) and Santa Clara Valley Transportation Authority (VTA) are in similarly desperate straits. Those three agencies run Caltrain, and all have had to scale back funding commitments to Caltrain, leading to reduced service and higher fares. San Francisco Municipal Transportation Agency (SFMTA) and other regional transit agencies also face similar challenges, with service reductions and fare increases becoming common.

Caltrain spokesperson Mark Simon told the San Mateo Times that the agency is fully funded through the current fiscal year that ends June 30, but after that, "I don't know how long we can survive." Simon said the agency has been working with the state and federal governments to secure additional funding, but that money is often tied to specific projects.

Ruchita Kadakia

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Subject: Caltrain faces deep cuts, perhaps even closure

Caltrain's San Francisco station on Townsend is crucial to the regional transportation system. Serious doubt was cast over the future of Caltrain today, with this vital commuter rail link threatened by the same funding cutbacks that are hobbling other regional transit agencies. The joint-powers agency might be forced to cut its service in half this summer – probably by eliminating night and weekend service – or perhaps even shutting the system down.

San Francisco Municipal Transportation Agency (SFMTA) is in a fiscal emergency and moving ahead with service reductions and small but significant fare increases. SFMTA and many other transit agencies have the authority to put general tax measures on the ballot to fund transit services, but so far in San Francisco, neither Mayor Gavin Newsom nor the seven SFMTA board members he appointed have shown any leadership in doing so.

Instead, Caltrain, SamTrans, and many other transit agencies have the authority to put general tax measures on the ballot to fund transit services, but so far in San Francisco, neither Mayor Gavin Newsom nor the seven SFMTA board members he appointed have shown any leadership in doing so.

The article below suggests that Caltrain might cease operations in the not too distant future. That's wonderful news, given the massive black hole for public dollars that this agency has become. However, this closure has implications for Palo Alto, since Stanford has been negotiating with Caltrain about rail passes for its employees.

So .. this sets a problem for Palo Alto, which has long been burdened by the growth of Stanford University. Caltrain has been a key part of that growth, providing a reliable and efficient transportation link between the university and the rest of the region.

Palo Alto could use grade separations at its rail crossings. If the high-speed rail system gets built, then this problem will be solved, one way or another. But right now, the state is not committing any more funding to this project, and Stanford has no other sources of operating revenue.

The $65M commitment was a "cost" to Stanford, but not a "transfer" to Palo Alto. So .. if Caltrain does close down, what becomes of this $65M in terms of mitigating the traffic that the hospital expansion will cause.

Some in the media have failed to notice that this $65M was not to be paid to Palo Alto, and have included it in the total $140+M that Stanford is offering to "buy" the permission of the City to build this facility. The $65M was a "cost" to Stanford, but not a "transfer" to Palo Alto.

So .. shouldn't the City be thinking about this?

Wayne Martin

Palo Alto, CA

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http://www.sfbg.com/politics/2010/04/01/caltrain-faces-deep-cuts-perhaps-even-closure#comment-15888

Caltrain faces deep cuts, perhaps even closure

04.01.10 | 3:04 pm

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Wayne Martin

Palo Alto, CA

48.1 *The commentor expresses concern regarding Caltrain closure.* Please see Master Response 1, which addresses the viability of Caltrain.

48.2 *The commentor expresses concern regarding Caltrain closure.* Please see Master Response 1, which addresses the viability of Caltrain.
Mr. Turner:

The following link is to an article about the use of robotics in a Scottish Hospital to reduce the actual number of workers needed to operate the facility:

http://www.bbc.co.uk/news/10344849

It would be nice if the Palo Alto EIR were to include some reference to robotics as a way to reduce staffing needs, which would have a clear impact on traffic of Staff going to/from their jobs.

Thanks.

wayne martin
palo alto, ca

49.1 The commentor requests that the Draft EIR include an analysis of using robotic technology at the SHC and LPCH hospitals as a way to reduce the number of proposed employees under the SUMC Project. The Draft EIR analyzes the SUMC Project application submitted by the SUMC Project sponsors. Since the use of robotics is not proposed under the SUMC Project, it is not considered in the Draft EIR. In addition, this technology is speculative and uncertain; therefore, it is not a viable mitigation measure to reduce the impacts identified in the Draft EIR. Please refer to Master Response 10 for a discussion of non-CEQA issues.
Ruchita Kadakia

From: Wayne Martin [wmartin46@yahoo.com]
Sent: Tuesday, July 27, 2010 2:05 PM
To: Turner, Steven
Subject: Additional Links Documenting Robotics In A Hospital Setting

Mr. Turner:

While the world of surgical robots has developed some magnificent machines that are helping to increase surgical quality and reduce costs:
http://www.davincisurgery.com/?id=it&gclid=CJqb_uTMjKMCFRxEgwodqW2QaA
I believe that commenting on their use in the Stanford Hospital EIR would not be appropriate.

However, the world of "service robots", which can reduce head count in an hospital, or other high head count facility, would be an appropriate topic for discussion:
http://www.youtube.com/watch?v=Alm_kmKqSpg
http://en.wikipedia.org/wiki/Mobile_robot
http://www.roboticstrends.com/service_robotics/article/swisslog_enters_autonomous_mobile_robot_market_with_speciminder_and_robocup
http://www.hospitalmanagement.net/features/feature83720/

Please include these links in the materials submitted by the public during the comment period for the Stanford Hospital Expansion EIR.

Wayne Martin
Palo Alto, CA
Please read: Important information about this locator.

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Individually, each of the robotic systems at Forth Valley Royal aren’t new. We’ve seen hospital robots in hospitals before, ditto for robot pharmacists, and cleaning robots (even industrial sterilizing ones) are fairly common now. What is really impressive is the assembly of all of these great technologies in one facility from its inception. This is a new approach to automating the hospital and it could be replicated in locations all over the world. Robotic systems are likely to become a staple of medical centers, giving staffers more free time to handle the really important part of their job: healing patients.

The SpeciMinder is very good at moving important tools around, and can help workers in a laboratory distribute materials around several workstations in an organized and timely manner. This function is INTER-department transport. While having basically the same capabilities as SpeciMinder, the RoboCourier will also be able to navigate elevators and hallways, greatly increasing its mobility and range.

The robots can attend to immediate tasks when commanded, or they can be scheduled to transport different loads at various times. They are very flexible and can pass through very narrow doorways or openings, and can carry up to 50 pounds worth of materials. Since they can sometimes be carrying very important tools, the robots have been designed to move at human walking speeds, chart out flexible routs and use collision-avoidance technology, all of which are said to make them very safe and reliable.

Besides lending a helping hand, the SpeciMinder and RoboCourier allow employees to save a lot of time, which can be used for much more crucial activities than simply moving materials around. It allows the humans to do the thinking, while the robots do the heavy-lifting—a system which will be quite beneficial in increasing operational efficiency.

Swisslog are known for their automated material transport systems, which they have used in medical facilities around the world, but perhaps none have looked like the complete package as much as SpeciMinder and RoboCourier. Initially, they will only be available in North America, but plans are to eventually spread their application to other places as well.

Watch the SpeciMinder in action below.


Mobile robot

A mobile robot is an automatic machine that is capable of movement in a given environment.

Contents

- 1 Overview
- 2 Classification
- 3 Mobile robot navigation
  - 3.1 Manual remote or tele-op
  - 3.2 Guarded tele-op
  - 3.3 Line-following robot
  - 3.4 Autonomously randomized robot
  - 3.5 Autonomously guided robot
  - 3.6 Sliding autonomy
- 4 History
- 5 See also
- 6 References
- 7 External links

Overview

Mobile robots have the capability to move around in their environment and are not fixed to one physical location. In contrast, industrial robots usually consist of a jointed arm (multi-linked manipulator) and gripper assembly (or end effector) that is attached to a fixed surface.

Mobile robots are the focus of a great deal of current research and almost every major university has one or more labs that focus on mobile robot research. Mobile robots are also found in industry, military and security environments. They also appear as consumer products, for entertainment or to perform certain tasks like vacuum cleaning.

Classification

Mobile robots may be classified by:

- The environment in which they travel:
  - Land or home robots. They are most commonly wheeled, but also include legged robots with two or more legs (humanoid, or resembling animals or insects).
  - Aerial robots are usually referred to as unmanned aerial vehicles (UAVs).
  - Underwater robots are usually called autonomous underwater vehicles (AUVs).
- The device they use to move, mainly:
  - Wheeled robot.
  - Tracks [1].

Mobile robot navigation

There are many types of mobile robot navigation:

Manual remote or tele-op

A manually tele-op’d robot is totally under control of a driver with a joystick or other control device. The device may be plugged directly into the robot, may be a wireless joystick, or may be an accessory to a wireless computer or other controller. A tele-op’d robot is typically used to keep the operator out of harm’s way. Examples of manual remote robots include Robotics Design’s ANATROLLER ARI-100 and ARI-50, Foster-Miller’s Talon, iRobot’s PackBot, and KumoTek’s MK-705 Roosterbot.

Guarded tele-op

A guarded tele-op robot has the ability to sense and avoid obstacles but will otherwise navigate as driven, like a robot under manual tele-op. Few if any mobile robots offer only guarded tele-op. (See Sliding Autonomy below.)

Line-following robot

Some of the earliest Automated Guided Vehicles (AGVs) were line following mobile robots. They might follow a visual line painted or embedded in the floor or ceiling or an electrical wire in the floor. Most of these robots operated a simple “keep the line in the center” algorithm. They could not circumnavigate obstacles; they just stopped and waited when something blocked their path. Many examples of such vehicles are still sold, by Transbotics, FMC, Egemin, HK Systems and many other companies.

Autonomously randomized robot

Autonomous robots with random motion basically bounce off walls, whether those walls are sensed with physical bumpers like the Roomba cleaners or with electronic sensors like the Friendly Robotics lawn mower. The simple algorithm of bump and turn 30 degrees leads eventually to coverage of most or all of a floor or yard surface.

Autonomously guided robot

An autonomously guided robot knows at least some information about where it is and how to reach various goals and or waypoints along the way. "Localization" or knowledge of its current location, is calculated by one or more means, using sensors such motor encoders, vision, Stereopsis, lasers and global positioning systems. Positioning systems often use triangulation, relative position and/or Monte-Carlo Markov localization to determine the location and orientation of the platform, from which it can plan a path to its next waypoint or goal. It can gather sensor readings that are time- and location-stamped, so that a hospital, for instance, can know exactly when and where radiation levels exceeded permissible levels. Such robots are often part of the wireless enterprise network, interfaced with other sensing and control systems in the building. For instance, the PatrolBot security robot responds to alarms, operates elevators and notifies the command center when an incident arises. Other autonomously guided robots include the SpeciMinder and the Tug delivery robots for hospital labs, though the latter actually has autonomous bases and software to design robot applications quickly. Shells shaped like people or cartoon characters are used.
Mobile robot - Wikipedia, the free encyclopedia

Sliding autonomy

Also see Autonomous robot

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<th>Date</th>
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<td>Driving up to 55 mph on empty streets.</td>
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See also

- Ant robot
- Autonomous robot
- Autonomous Underwater Vehicle
- Domestic robot
- Humanoid robot
- Industrial robot
- Mobile manipulator
- Robot
- Robotic arm
- Robotic mapping
- Robot kinematics
- Ubiquitous robot
- Unmanned Aerial Vehicle

References

1. ^ Rail track and Linear track (PDF)
5. ^ Welcome

External links

- A tutorial about line tracking sensors and algorithms
- BioRobotics Laboratory, Research in Mobile Robotics and Human-Robot Interaction
- Department of Production at Aalborg University in Denmark, Research in Mobile Robotics and Manipulation

Swisslog, a leading provider of automated materials transport and pharmacy automation solutions for hospitals, announced that it has entered the autonomous mobile robot market with the introduction of two new mobile robots: SpeciMinder and RoboCourier.

SpeciMinder is a mobile robot designed for hospitals and healthcare facilities throughout the world. Swisslog has tested SpeciMinder in a real-world hospital environment for the past three years.

SpeciMinder is a mature robot that is a natural extension of Swisslog’s Automated Materials Transport Systems (AMTS) product family. The AMTS product portfolio currently consists of a platform for rapid transport of light loads, such as tools, instruments, and medical supplies, an automated guided vehicle platform for a standardized transport of heavy bulk loads, and an autonomous guided vehicle platform for a fully integrated transport system.

SpeciMinder and RoboCourier provide on-demand scheduled transport of both small loads weighing up to 50 pounds, thereby filling the void between the other AMTS products.

SpeciMinder and RoboCourier have highly maneuverable, capable of navigating through congested hallways and door openings as narrow as 27 inches. They are also able to traverse narrow aisles and corners, which require a high level of maneuverability.

Swisslog is releasing SpeciMinder now and is designing exclusively for the INTRA departmental materials transport, for example, a large core floor laboratory or pharmacy in which several workers frequently move goods among multiple workstations as an ideal environment for SpeciMinder. The primary benefit of SpeciMinder is a tremendous increase in operational efficiency. The robot significantly reduces the manual labor required to move materials around a large department, resulting in many man-hours being released to the department for other work.

Swisslog RoboCourier will be available later this year and is designed for the INTI departments, for example, a large core floor laboratory or pharmacy in which several workers frequently move goods among multiple workstations as an ideal environment for SpeciMinder. The primary benefit of SpeciMinder is a tremendous increase in operational efficiency. The robot significantly reduces the manual labor required to move materials around a large department, resulting in many man-hours being released to the department for other work.

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The word "robot" comes pre-loaded with its own set of unique connotations. To most, robots are a science fiction concept; a flight of fancy conjured by the vivid imaginations of Isaac Asimov, Arthur C Clarke and the like. In fact, robotics is a vibrant emerging field that is steadily building credibility as a method of making our lives safer and more convenient. From living rooms and factories to battlefields and operating theatres, robots are increasingly whelming their way out of our imaginations and into our daily lives.

With busy medical professionals increasingly under pressure to make the best possible use of their time, hospitals often play host to the latest innovations in advanced robotics. From remotely operated surgical devices to simple drug dispensers, here we present some of the most significant developments in medical robotics and their potential for improving patient care and simplifying the daily tasks of hospital staff.

neuroArm

One area in which the automated precision of robots has huge potential is surgery. While it may be some time before the technology is refined (and inexpensive) enough to become a part of surgeons' day-to-day lives, several new innovations have emerged in recent years that are bringing hospitals a step closer to a future where surgeons work in tandem with robotic counterparts to achieve better results.

The neuroArm, for example, was officially launched in April 2007. This robotic device was developed by Dr Garnette Sutherland at the University of Calgary in Canada. It is designed to perform remotely controlled neurosurgery in conjunction with an MRI. The surgeon controls the device's robotic appendages from a nearby workstation, which projects a 3D display of the surgical site and MRI data, with superimposed virtual tools allowing full control of the system. As the neuroArm is MRI-compatible, it can actually perform stereotactic surgery from inside the bore of an MRI with near real-time image guidance.

But the robot that has proved to be the most pervasive presence in operating theatres is the da Vinci Surgical System. As of December 2009, nearly 1,400 of these devices have been sold worldwide, with the majority appearing in US hospitals. The da Vinci System has been used for a wide range of laparoscopic (keyhole) surgeries, and has been seen to reduce bleeding during operations and minimise post-operative pain, scarring and recovery time.

Robotic surgeons are now able to perform many duties remotely. It allows them to make rounds during off-duty hours to maintain quality of care and stay up-to-date with patients' conditions.

Dr Robot will see you now – InTouch's Remote Presence robot

The latest incarnation of the Da Vinci surgical system, the Da Vinci Si. The device, which costs between $4,000 and $7,000 a month to lease (depending on volume of orders and time commitment from hospitals), has been primarily used in fields where the ratio between medical professionals and patients is particularly high. For example, the ratio of ICU patients to ICU doctors is such that a single ICU doctor can only manage a small fraction of the patients. The RP-7 allows them to make rounds during off-duty hours to maintain quality of care and stay up-to-date with patients' conditions.

"The robot can connect to medical instruments such as electronic stethoscopes."

Developing the future - remote surgery and nanorobotics
Scientists are also developing increasingly complex robotic devices in an effort to eventually make truly science fiction concepts a reality.

The da Vinci surgical system could theoretically allow remote surgery to take place over much larger distances than from one hospital room to another. Although this area is not currently a priority for manufacturer Intuitive Surgical, the system could theoretically facilitate remote surgery across oceans and continents. The would-be benefits of this development are clear, as it would allow patients in remote locations (or soldiers in combat zones) to receive remote surgery from half the world away.

Nanorobotics is much discussed as a potentially revolutionising force in modern medicine. While the development of nanorobots (microscopic devices measured in nanometres - one billionth of a metre) is still in the theoretical stages, researchers believe they could play a vital role in the future treatment of disease. Small enough to enter the blood stream, possible applications of nanorobots include targeted drug delivery to combat cancer (as an alternative to chemotherapy), advanced diagnostics and regenerative medicine.

Today, robots are just beginning to make their way into the wards and operating theatres of our hospitals. Advances in medical robotics are impressive but new technologies are still expensive to implement and often impractical in the current medical environment.

Last year, a pilot scheme in the US replaced manual medicine delivery with self-guiding robots. This might have been a futuristic idea but results showed that nearly 10% of mechanised deliveries failed to reach their destination and patient satisfaction declined in comparison to traditional delivery methods.

Despite the stumbling blocks along the way, it is projects like this that foster greater awareness of the benefits of medical robotics. As hospitals begin to make planning decisions that integrate robotics with conventional human expertise, we may begin to see our hospitals transform into something worthy of the best science fiction.

“Advances in medical robotics are impressive but new technologies are still expensive to implement.”

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Related links
Minimal Invasion
The Arguments For or Against Robotics
The Mayo Clinic Trials Health’s New Big Brother

Post to: Delicious Digg reddit Facebook StumbleUpon

50.1 The commentor requests that the Draft EIR include an analysis of using service robotic technology at the SHC and LPCH Hospitals as a way to reduce the number of proposed employees under the SUMC Project. Please see response 49.1. Please refer to Master Response 10 for a discussion of non-CEQA issues.
Minor, Beth

From: Stepheny [stephenyograw@att.net]
Sent: Thursday, July 08, 2010 8:54 AM
To: info@stanfordpackard.org
Cc: Council, City; Anneke Olneckas; Jeb Eddy; Jill Matzke; Karen H. Lawrence; Kerry Kenny; Peggy Kenny; Sharron; Furman, Sherr; Sylvia Garber
Subject: What about health care efficiencies, costs?

At present, I cannot support this mega project for Stanford Packard. It is critically important that as a nation, we move to make health care more efficient and more affordable. Stanford Packard’s expansion has a chance to model the way and yet there is NO mention of any such measures surrounding this project.

Local paying patients are expected to subsidize experimental and extraordinary medical efforts for those brought in from around the world and around the nation. What is being done to make Stanford medical care more efficient, more affordable and more effective?

At a neighborhood meeting in 2008 your representatives had nothing to offer on this subject. Since then, I have still heard no plans to reduce our out of control medical costs.

I look forward to hearing your response.

Sincerely,

Stepheny McGraw

7/8/2010
51. **Stephney McGraw (letter dated July 8, 2010)**

51.1 *The commentor expresses opposition to the SUMC Project.* The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
Council members:

When discussing Stanford Hospital SEIR, I suggest that you discuss both the impacts and the offsets in similar measures (e.g., dollars, housing units). I have found that when one discusses costs and benefits in different measures—an easy trap to fall into—they often wind up being unintentionally far out of balance.

For the proposed Stanford offsets via payments, I would suggest that they be expressed not just dollars, but what those dollars could accomplish. For example, how many housing units does $23M represent, and how does this compare to what the expansion is likely to add to PA's target?

Similarly, in discussing the impacts, it would be useful to include estimated costs. I realize that such estimates are difficult and that some of the impacts cannot be remediated, but it is still useful. For example, for increased traffic delays, translate those into person-hours per year and then assign a dollar cost based upon a valuation of the lost time (impractical).

I expect that having such direct comparisons would be useful both to you (Council members) and to the community.

-- Doug Moran
52. **Doug Moran (letter dated May 24, 2010)**

52.1 *The commenter requests the analysis contain a cost benefit evaluation of the impacts and mitigation measures using measures that include estimated costs (dollars), number of housing units, etc.* The Draft EIR is not the appropriate forum for the type of cost/benefit analysis proposed by the commenter. However, as part of the project approval process, a Fiscal Impact was prepared by CBRE Consulting, Inc. in February 2009 to determine potential tax and fee revenues that would be generated by the SUMC Project. These fees would be required to sufficiently fund the anticipated costs of providing municipal services to the SUMC Project. The analysis used a time horizon of thirty years (2010-2040) to be consistent with the proposed Development Agreement, which is outlined on pages 2-27 through 2-28 of the Draft EIR. For the monetary impacts of the SUMC Project and the required fees to be paid by the SUMC Project sponsors, please refer to the Fiscal Impact Analysis, which is available at the City’s website.¹

This comment concerns financial issues and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

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Steve,

I have been thinking again about some of the EIR mitigation measures and want to suggest some potential corrective actions. A number of mitigations are proposed for the various impacts. In some cases they are one-time or very short time actions that are fairly easy to monitor and require corrections if they are not done right or are incomplete. Others require rather extensive on-going measurement and can require future corrective actions. One that looms large is traffic. There have been many comments about the potential inadequacy of Go

Pass distribution if CalTrain cuts back or ceases operation. The EIR talks some about monitoring use of Go

Passes and if not enough workers use them making it harder or more expensive to park and expanding the shuttle service. It does not mention expanding shuttle service to the East Bay, although this was mentioned by people during the hearings. However there are few other fall-back positions if those actions still fall short. Also it's unclear who will oversee and verify adequacy of mitigations and who will enforce failure to comply and how it will be enforced. Right now it appears that Stanford Medical will track compliance and decide when and how to impose changes and upgrades to the mitigations. There may be a better way.

Full buildout and completion of the project will take on the order of 20 years. Why not have regular reviews, say every 3 or 4 years, of the effectiveness of mitigations such as for traffic impacts? If reality falls short of plans, halt or significantly reduce any construction or expansion until the problems are corrected. Stanford has a similar arrangement with the County regarding traffic and campus expansion, and they have been pretty successful in keeping traffic counts at the allowed maximums, although there were a few times when they went over and had to stop construction activities for awhile. There should be clear City review and oversight of all mitigations, verify that they are performing as intended, and the ability to enforce corrective actions if the mitigations prove inadequate. It will take staff effort, so SMCU should pay some if not all of the staff expenses for on-going performance monitoring. I suspect it would be less than a full staff person, probably half or less, not too huge an expense.

Thanks for all your effort on the EIR and project. It has been a very major task, far bigger than anything we've ever had.

Regards, Bob Moss
Bob Moss (letter dated July 27, 2010)

53.1 The commentor states that he would like to suggest corrective actions to the EIR mitigation measures due to the potential inadequacy of the GO Passes if Caltrain reduces or ceases operation. Monitoring is a requirement of Mitigation Measure TR-2.3 to determine if the modal split away from single occupant vehicles is achieved. The SUMC Project is also required to use reasonable efforts to lease parking spaces in the East Bay and maintain adequate bus service from the East Bay to the hospital complex as part of Mitigation Measure TR-7.2. Please also see Master Response 1 concerning the viability of Caltrain.

53.2 The commentor is concerned about who will monitor and verify adequacy of the mitigations during the construction and operation of the SUMC Project. As explained on the Introduction Section on page 1-5 of the Draft EIR, if the SUMC Project is approved, then the City of Palo Alto must adopt a Mitigation Monitoring and Reporting Program (MMRP), which would ensure that the mitigation measures adopted from the Draft EIR are being implemented. Please see Master Response 11 for a description of an MMRP and the SUMC Project review and approval process.

Regarding the City staff expenses that could be incurred during monitoring, this is a financial issue that is outside the scope of CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.
One time a friend of mine from the English speaking Mosquito Coast of Nicaragua married a young man from East Palo Alto, and he told me that he worked at Stanford, and added that he was approaching the end of his first year and he hoped they wouldn't fire him. "But why would they fire you?" I asked. "Because after that time they have to give you benefits, like health insurance, so they fire you so they can get somebody they don't have to give health insurance to." Stanford has many wonderful attributes, and it's grand to bask in the reflected glory of Nobel prizes and cutting edge research, and you could certainly recognize that a hospital is much more efficient adding space in a greater height, but you also have to recognize the increased cost/profit from having all private rooms, and you have to realize that part of their labor cost is borne by the community.

Even though it looks as if you're nickel and diming them to death, they're walking away with the store if you allow them to build all that commercial--and don't fool yourself, the health industry is commercial, big time--and stick you with the cost of housing the estimated 2242 new employees, half of them 190w income.

ABAG every 7 years takes note of the new jobs and assigns the cities a commensurate low-income housing number. In San Mateo County it's county-wide, but in Santa Clara county, it goes by city by city. So Menlo Park, Redwood City, Mountain View and Cupertino aren't going to get stuck with the tariff, Palo Alto is.

Stanford's EIR is deficient in not recognizing the cost of the housing to Palo Alto. To hear them tell it, Palo Alto needs only zone parts of the city higher density, but that's by no means the end of the story. There was a time, about seven or eight years ago, when I stood here and said "If a 4,000 square foot house is selling for a million, then four 1,000 square foot apartments in the same volume building can sell for a quarter of a million each." The then Council didn't give me the time of day, and I am talking about market rate housing.

Now, each unit of low income housing built will cost, at a minimum, $250,000, and many knowledgeable persons--I think Yoriko Kishimoto is one--estimate it as estimate it as closer to half a million. Each unit.

Just ask yourselves--really ask yourselves, the value of the electric sub-station moved from Aloma Street, which Palo Alto gave to the non-profit for low income housing. Why? Ask yourselves why.

And you could also ask yourselves what the purpose of the State law that says if a structure changes occupancy use it has to upgrade to current seismic standard--a purely arbitrary demand, that the State, given the incentive, could easily change.

Stephanie Munoz.
54. Stephanie Munoz (letter dated June 29, 2010)

54.1 *The commentor expresses fiscal concerns about the SUMC.* This comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

54.2 *The commentor raises the cost of providing affordable housing for new hospital employees.* A Fiscal Impact Analysis was prepared by CBRE Consulting, Inc. in February 2009 to determine potential tax and fee revenues that would be generated by the SUMC Project. For the monetary impacts of the SUMC Project and the required fees to be paid by the SUMC Project sponsors, please refer to the Fiscal Impact Analysis, which is available at the City’s website.¹ In addition, one component of the Development Agreement between the City and the SUMC Project sponsors would be the payment of a housing in-lieu fee in the amount of $23.1 million, which is equivalent to what a commercial project would pay. The terms of the Development Agreement are included in the Draft EIR on page 2-27, Section 2, Project Description.

One of the SUMC Project alternatives analyzed for the SUMC Project in Section 5, Alternatives, is the Village Concept Alternative, which would provide affordable housing. Under this alternative, housing would be provided at three sites within the vicinity of the SUMC Sites and would be dedicated to SUMC employees. For more information about the Village Concept Alternative, please refer to Section 5, Alternatives. Please refer to Master Response 10 for a discussion of non-CEQA issues.

54.3 *The commentor raises the issue of moving the electrical sub-station from Alma Street.* The electrical sub-station is not located at the SUMC Project Sites and is not included in the SUMC Project. As such, this comment does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues.

54.4 *The commentor questions the need for State seismic standards when a structure changes occupancy use.* The requirement for the SUMC hospitals to meet seismic standards was not triggered by the change in occupancy use, but by Senate Bill (SB) 1953. The Alfred E. Alquist Hospital Facilities Seismic Safety Act of 1994 (SB 1953) requires all hospital facilities to meet new seismic standards and establishes a timeline for these improvements. SB 1953 requires that both structural and non-structural elements of existing hospitals meet the new standards either through retrofit or replacement. If a hospital does not comply with these regulations, the State can revoke the hospital’s operating license.

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As described on pages S-8 through S-9 of the Draft EIR, Summary, the Stanford Hospital complex consists of buildings built in 1959, 1973, and 1989, some of which do not meet the current seismic safety requirements imposed by SB 1953. Therefore, a significant portion of its facilities must be replaced or renovated in order to meet current safety standards. The SUMC Project sponsors have determined that in many cases it is more cost efficient and physically practical to demolish older, noncompliant buildings and replace them with new facilities that meet the standards. Please refer to the Draft EIR for more details regarding seismic safety and changes proposed under the SUMC Project.
Hi Sidney,

Sorry to hear about your close call with the Ambulance. You’d they would understand.

I’m going to pass your comments over to the Stanford Project as part of a public comment, via this email.

Thank you for your input and we hope you are feeling better.

Diana

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>> "Sidney Overland" <sidneyoverland@yahoo.com> 7/22/2010 11:53 AM >>>

I would like to add to Janet’s comments about safety on Alpine Rd. This area is even more dangerous for pedestrian’s.

I have a shoulder injury and could not drive for quite some time. There were times that I had to walk to Sharon Heights or to the Bus Stop from our house on Bishop Lane.

The situation is unacceptable for pedestrians, especially those who are elderly, injured, or disabled in some way. The traffic lights and cross walks do not allow pedestrians to cross Alpine Rd. So, I was forced to walk farther to get to the pedestrian under pass. Adding the extra distance was very hard on me and took a lot of extra time. To get to Sharon Heights, I had to hike to Junipero Serra and hike under the the street, come back up, cross Sandhill, and cross back over Alameda/SantaCruz. That is a lot of extra walking for an injured person in pain.

In addition, when I had stepped into the crosswalk at Alameda Del Las Pulgas and Sandhill Rd., an ambulance without lights or siren almost ran me over because they were wiping around the corner and they didn’t notice me.

This intersection is too dangerous for pedestrians. It was pretty obvious to me.

Other times, I tried crossing Alpine at the back entrance to the Buck Estate; however, the speed of traffic makes it way to dangerous for pedestrians. The best way for pedestrians to get to Sharon Heights from Alpine is by walking through the Buck Estate because its much safer, takes less time, and is physically easier on the pedestrian. However, the speed of traffic makes crossing Alpine close to impossible.

I was very upset that I while using the pedestrian route, I was almost run over by an ambulance while I was in a crosswalk with a green light.

I believe a senior citizen was killed in front of a retirement community very close to the bus stop that I was trying to reach.

The situation on Alpine is just unacceptable and an increase in traffic will only make it worse. It will also make the intersection at Alameda and Sandhill more dangerous.

Sidney Overland
55. Sidney Overland (letter dated July 22, 2010)

55.1 The commenter conveys his difficulties crossing the street at multiple intersections in the area and believes that the increase in traffic would only make the situation worse. The Sand Hill Road/Santa Cruz Avenue intersection is under the jurisdiction of Menlo Park. If the current pedestrian signal phase is too short to allow pedestrians to safely cross, it could easily be lengthened by Menlo Park. The SUMC Project would add 147 AM Peak Hour vehicle trips and 152 PM Peak Hour vehicle trips to this intersection. Generally, accidents result from both poor design and traffic volumes. However, the SUMC Project does not contribute to the real or perceived unsafe conditions at the Sand Hill Road/Santa Cruz Avenue intersection.
Honorable Mayor Burt and Council Members,

Congratulations on the completion of the draft Environmental Impact Report for the Stanford Hospital renewal project. This is a great step forward toward the important goal of completing the project review in this calendar year. I urge you to remain focused and avoid making unrelated requests of Stanford in the development agreement.

In your deliberations, please consider the many positives of Stanford's behavior in the community. I hold up as an icon the Marquerte shuttle system. If you want to understand how public transit can work optimally, go to the Caltrain station on University Ave any weekday morning and take the a Marquerte A or B Counter clockwise shuttle to Campus. Stanford Hospital and Packard Clinic and other employees are moved, quickly and efficiently from Caltrain to their places of work. The Marquerte is really a dream system, is environmentally responsible and actually builds community. It demonstrates how professionally and effectively Stanford consistently addresses issues.

As you move forward I hope you will address only matters directly related to the project. You've made great progress toward narrowing down a 'wish list' that, among other negatives, could have damaged the image and reputation of Palo Alto city government. It is essential for Palo Alto to manage its budget responsibly and rely on an external utility to fund projects unrelated to its operations and impact is neither sound nor sustainable fiscal policy.

Between now and July 27 I hope that you will focus on the innumerable win wins of this project so that our community can continue to be served by top notch healthcare.

Sincere thanks to the entire Council for your service to our city.

Kind Regards,
Nancy Peterson
Albion Avenue
Palo Alto
56. **Nancy Peterson (letter dated May 22, 2010)**

56.1 *The commentor describes the benefits of the Marguerite shuttle that provides transit service from the Caltrain station on University Avenue to the SUMC Sites.* The SUMC Project would encourage employees to use the Marguerite Shuttle. In addition, the Draft EIR includes Mitigation Measure TR-2.3, which would expand Marguerite shuttle service between the SUMC and Palo Alto Intermodal Transit Center (PAITS). Please refer to pages 3.4-68 and 3.4-79 of the Draft EIR, Transportation, for more details. Please see Master Response 2 regarding the feasibility of expanded shuttle service.

56.2 *The commentor urges the City to make sound and sustainable fiscal decisions regarding the SUMC Project.* The comment concerns financial issues and the Development Agreement, which do not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 10 for a discussion of non-CEQA issues and Master Response 12 for a discussion of the Development Agreement.

56.3 *The commentor expresses support for the SUMC Project.* The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
Dear Council Members:

I believe that the most important decisions you will make during your respective terms on the city council, decisions that will determine the long-term viability of our city, will be those decisions you make regarding the proposed Stanford Medical Center Expansion Project.

While I agree that council members need to carefully weigh the impact this project will have on the city’s finances, its infrastructure and its physical and social environment, I believe it needs to give equal weight to the impact your decisions will have on the medical center and the university as well.

I strongly support this project. In this letter I will tell you why.

First, I ask you to consider exactly what Stanford University and its various activities and enterprises have meant and will continue to mean to Palo Alto and the entire south peninsula. But for Stanford, our city would just be another small peninsula town. We would continue to enjoy the same climate, the same views of the coast range and proximity to the bay and the same cultural offerings of the City of San Francisco. But we would not be distinguished from any other town up and down the peninsula. In fact, it is very unlikely that there would be a Silicon Valley here, or another major city like San Jose with its growing business and cultural offerings to the area.

Second, consider that without Stanford, the PAUSD would be just another typical school district rather than one of the highest ranked districts in the country. And with a lesser school district, Palo Alto would not enjoy the consistently high property values and economic stability that so many of our residents enjoy today, even during this serious financial recession. Without the influence of the academic faculty and high caliber administrative and support staff who live and work in this area, Palo Alto would be an entirely different town and all the special services and amenities that many claim to not just enjoy but need, would likely not exist.

Third, give some thought to what Stanford offers to this community on a regular basis aside from the medical center: a superb museum including the Rodin sculpture garden; theater; musical concerts in several venues; lovely grounds generally open to the public for recreation and contemplation; access to educational programs for continued learning; the world famous Stanford Research Park and all that signifies; the beautiful Stanford Shopping Center, which exceeds in beauty and store offerings and successfully competes with the highly acclaimed Santana Row in San Jose and much more. In fact, the council’s recent “Destination Palo Alto” PR project relied for success largely on the lure Stanford has to tourists and business travelers.

Fourth, just look what Stanford has done for the community in a variety of ways no other city enjoys: the playing fields at El Camino Road and Page Mill Road, given as a virtual gift to the city; the reconstruction of Sand Hill Road on El Camino Road; the reconstruction of El Camino Real at the main entrance to the Stanford Shopping Center; the lease at minimal cost of the small park across from the shopping center; the lease of vital lands at costs way below market value to the city utility department for use for its facilities.

Finally, consider that most of these activities bring much needed revenue to the city through shoppers who use the shopping center, business travelers who come to the university, the research park and other venues along Sand Hill Road, students and visiting faculty who make use of our rental properties, stores and other revenue generating services. In addition, I understand that Stanford participates in what I assume is its share of public safety services through the fire station on campus and in other ways during public events like major sports activities. Remember too, the Senior Games came to Palo Alto because of Stanford University.

All of this, and not one word yet about the medical center project.

I believe I will not be alone when I say that my wife and I have benefitted in life saving ways because of the proximity of the Stanford medical center, its superb, world class medical faculty and staff and the advanced technology made available to us. Now that we are seniors and health care becomes more of an issue for us, having Stanford nearby is a great comfort. In fact, my late mother had the quality of her life and longevity extended (she died a year ago at age 97) because as a recent Palo Alto resident she was able to get to the Stanford hospital in a timely life saving manner. But there is another factor that many people in town may not consider. It is this. The presence of Stanford here has a direct relationship to the overall quality of medical care provided by the local medical community, who are not necessarily on the medical center faculty. The Palo Alto Medical Foundation exists here as it is today largely because of the influence of the university medical center ever since it moved here from San Francisco in 1959.
This is quite a bill of positive particulars for one institution to bring to a community. While the university is not perfect, and while it brings with it its share of problems that the community has to work out and/or live with, I think the balance leans heavily in favor of positive benefits to Palo Alto and its residents. Stanford has been a good neighbor, and considering its global mission and responsibilities as the university sees them, I think the institution has bent over backwards trying to be a good and beneficial neighbor. I know of no other enterprise in the city that has done as much for us as the university and its world class medical center has done and will continue to do.

Yes, with the proposed medical center expansion, we will have to pay a price, but Stanford is showing its willingness to mediate traffic and housing problems that will arise. Its financial contributions to the city, both in direct payments and generated fees related to the project will amount to tens of millions of dollars. Ongoing tax and other revenues can only be good news to sadly depleted city coffers, and to local businesses who are feeling the pinch of the recession. To those who complain about increased traffic, I believe the community can resolve these issues and besides, traffic will increase as the city grows, in spite of Stanford - just look at the high density housing projects the council continues to approve. Some opponents criticize the high rise nature of the project. I would like to remind residents that these buildings will be located deep into Stanford property, and will not even be visible to nearby downtown or residential areas.

Stanford has been a Godsend to our community. The advantages are mostly ours. Now the university has come to the community to ask for approval to expand its medical center to meet not just local needs, but the needs of the entire south peninsula and beyond. But that is what a world class medical center does. I urge the council to respond positively, seeking a proper balance between protecting the city's legitimate concerns as related to this project, without expecting Stanford to solve every problem we can possibly think of. Do not kill the golden goose from which we derive such splendid gifts.

I have a personal friend dating back to the time we were boys together, who is now in a nursing home for the rest of his life, because he lives in an area where the kind of care we tend to take for granted was not available to him. And I know of other friends and family, who face the same situation, because they are not fortunate to have world class medical care available to them. Let's not hold Stanford back, possibly putting us in the same position.

Sincerely yours,

Richard and Jeanne Plaone
Chimulus Drive
Palo Alto, 94306

7/12/2010

57.1 The comment pertains to the review process of the EIR and the SUMC Project in general. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review process.

57.2 The commentor requests consideration of the services that the SUMC has provided for the City of Palo Alto currently and in the past. The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
Dear Mr. Turner,

Forgot to mention that a significant number of Oak Creek Apt. residents use Oak Ave./Middle Ave. as a cut through to ECR when eastbound Sand Hill Road is jammed in the a.m. They find it faster to turn right, go out Sand Hill over the bridge and hang a right on Oak Ave.

Rich Rollins, Broker
Rollins Realty and Management
640 Menlo Ave.
Menlo Park, Calif. 94025
Cell 415-999-7109

Thank you. These comments will be entered into the record.

--Steven Turner

Dear Mr. Turner, just wanted to make sure the email below to the MP City Council and staff made it into your record of comments on the draft EIR.

In particular, we would like further analysis on not only the current and projected origin and destination impact of the Hospital expansion on Oak Ave., which currently serves as a primary access route from West Menlo Park to the Hospital complex (i.e., staff, patients, visitors), but also the impact of diverted traffic that would continue to use the Middle/Oak Ave. corridor as a means to avoid the congestion on Sand Hill Road.

With the inability of drivers from downtown Palo Alto to get across El Camino from Alma, the stop and go pm peak commute pattern due to restricted 2 lanes from ECR to Arboretum, and the downtowns uncoordinated signals west from Arboretum to Santa Cruz, it appears that the Hospital expansion would exacerbate the limited access to, and congestion on, Sand Hill Road, thereby creating a significant impact on the Middle/Oak Ave. corridor and Oak Knoll Elementary School neighborhood in West Menlo Park.

Sincerely,
Rich Rollins
27 year resident of Oak Ave.
Former Menlo Park Transportation and Planning Commissioner

--- Forwarded Message ---
From: rich.rollins@scglobal.net
To: Turner, Steven
Cc: sturner@mpch.org; katerfens@mpch.org; bournepub@bci.com; thprop@earthlink.net
Subject: Re: Stanford Hospital expansion DEIR comment letter

Thank you; these comments will be entered into the record.

--Steven Turner

Dear Council, the proposed Hospital Expansion traffic impact analysis failed to study the potential substantial impact on Oak Ave., and the Oak Knoll School neighborhood.

Oak Avenue, at 24 feet wide, and, now with a new school parking and delivery entrance to Oak Knoll School, is already suffering excessive traffic due to the 2 outbound lanes to Sand Hill Road and speeding cars making the sharp right turn from Sand Hill onto Oak.
As you know, the signal at Oak and Sand Hill is a huge attractant to cut through traffic, and the safety of pedestrians and cyclists on Oak Ave. is compromised daily. The hospital expansion will undoubtedly create even more cut through traffic as drivers attempt to avoid the near gridlock on Sand Hill Road during commute hours. Residents of our neighborhood would appreciate that this oversight be noted in your comment letter to the City of Palo Alto, and strongly urge the City of Palo Alto to respond to this oversight.

Respectfully submitted,

Rich Rollins, Broker
Rollins Realty and Management
640 Menlo Ave.
Menlo Park, Calif. 94025
Ofc. 650-327-0375 Fax 650-327-0382
Cell 415 999 7109

58.1 The commentor notes that a significant number of motorists use Oak Avenue and Middle Avenue as a cut through to El Camino Real when there is traffic on Sand Hill Road in the morning. The commentor would like further analysis on the current and projected origin and destination impact of the hospital expansion on Oak Avenue and the impact of diverted traffic that would continue to use the Middle Avenue/Oak Avenue corridor as a means to avoid the congestion on Sand Hill Road. Please refer to Response 8.24 concerning the analysis of Oak Avenue.
From: steve.schmidt@menloparksteve@gmail.com
Sent: Tuesday, July 06, 2010 9:32 PM
To: Stanford Project
Subject: Comment on bike/pedestrian conditions & mitigations

Dear Steven:

Below are my comments on the Medical Center DEIR:

Comments on DEIR for Stanford Hospital Expansion

Transportation Section:

1. Map showing bicycle facilities indicates a Class I facility on Alpine Road. Past the Menlo Park City Limit in San Mateo County, the side path does not meet the minimum standards for Class I facilities.

2. The discussion of bicycle/pedestrian facilities indicates that two new bicycle/pedestrian undercrossings of the Caltrain tracks will be built: one at Everett in Palo Alto and one at Middle Ave. in Menlo Park. It is stated that these improvements will “facilitate walking and bicycling from residential and commercial areas in North Palo Alto and South Menlo Park.”

The choice of Middle as the site for an undercrossing is premature and impractical for several reasons:

1. the site has not yielded a design that has been approved by the Menlo Park City Council, the Menlo Park Bicycle Commission or the Menlo Park Transportation Commission;

2. the site is not contiguous with the Class II bicycle facility on Willow Road that serves neighborhoods east of the Caltrain tracks;

3. the site is nearly ¾ mile from Stanford and Sand Hill Road;

4. construction at the site is in conflict with a Caltrain vertical alignment required to accommodate future grade separations;

5. the site would require expensive below grade switchbacks on both sides;

6. access to the eastern portal of an undercrossing at this site would create an unprotected mid-block T-intersection with Alma Street;

7. the site lacks direct and simple connection for users from east Menlo Park to Stanford Medical Center and Campus;

8. the intersection of Middle and El Camino is encumbered with commercial ingress and egress on Middle serving a Safeway superstore and a busy Shell gas station.

An alternative site previously studied is at Willow and Cambridge, approximately ¼ mile from Sand Hill Road and possessing none of the problems outlined above. It would be considerably less costly to construct due to the uncomplicated approach and generous elevation of the railroad tracks. Because of this site’s proximity to Stanford it would be more likely to attract Stanford trips to and from Menlo Park.

If Stanford were to share the costs of constructing an undercrossing at the Willow/Cambridge location, it would be a far more efficient use of limited resources for Stanford, Menlo Park and other potential funding partners.

Steve Schmidt
Former Mayor, Menlo Park
650-323 5546
menloparksteve@gmail.com
Steve Schmidt, Former Mayor of Menlo Park (letter dated July 6, 2010)

The commentor states that the Draft EIR indicates a Class I bicycle facility on Alpine Road past the Menlo Park city limit into San Mateo County; however, the side path does not meet the minimum standards for Class I facilities. Draft EIR Figure 3.4-2, which shows the existing bicycle facilities, has been revised for the Final EIR. Please refer to Staff-Initiated Change 2 for the revised Figure 3.4-2.

The commentor notes that in the discussion of bicycle and pedestrian facilities two new undercrossings of the Caltrain tracks would be built, one at Everett Avenue in Palo Alto and one at Middle Avenue in Menlo Park. The commentor notes that the choice of Middle Avenue for an undercrossing is premature and impractical. In discussion with City of Menlo Park staff, the City indicated that they planned to construct a bicycle and pedestrian undercrossing in the vicinity of Middle Avenue. The SUMC Project is required to contribute its fair share contribution to this undercrossing. Its exact location and design features would be determined by the City of Menlo Park.

The commentor notes that an alternative site previously studied at Willow Avenue and Cambridge Avenue exists approximately 0.25 miles from Sand Hill Road and possesses none of the problems outlined in Comment 59.2. Please refer to Response 59.2, above. The SUMC Project sponsors would pay their fair share toward the construction of a single undercrossing of the Caltrain tracks in Menlo Park, at a location determined by the City of Menlo Park.
Dear Mr. Turner:

This letter is to convey two comments on the SUMC DEIR:

1. General: As set forth in the DEIR, the project will result in numerous significant environmental impacts that cannot be mitigated to less-than-significant levels, even after the mitigations identified. Nevertheless, the beneficial aspects appear to override the impacts—after effective mitigations. We therefore support the project and ask for diligent implementation of mitigations and openness to new ways of dealing with the impacts that may develop over the lifetime of the project.

2. Regarding Traffic Impacts and Mitigations: As you know, the credibility of mitigations overall in the SUH plan, and the actual outcomes, depend not only on statements of policy but on commitment to implementation of measures effective in the real world, and sustained enforcement.

With respect to the management of trucking impacts, both during the years of construction and there after (ongoing provision of supplies for day to day operations):

We appreciate the inclusion of Figure 3.4-6, showing "Proposed SUMC Truck Routes." TR-1.5-8, S-32 ff. state:

Restrict Construction Truck Routes. The SUMC Project sponsors shall be required to deliver and remove all construction-related equipment and materials on truck routes designated by the cities of Palo Alto, East Palo Alto and Menlo Park. Heavy construction vehicles shall be prohibited from accessing the site from other routes. Figure 3.4-6 and 3.4-7 of the EIR illustrates the Stanford Area Truck Routes which must be used by all trucks.

Prepare and Implement Construction Impact Mitigation Plan. In lieu of the above mitigation measures, the SUMC Project sponsors shall submit a detailed construction impact mitigation plan to the City of Palo Alto for approval by the Director of Public Works.

Please note in the paragraphs above that in addition to the cities named, Santa Clara County has jurisdiction over two of the roads prohibited in the map (Junipero Serra Blvd. and part of Stanford Avenue), and should be added to the list of jurisdictions. County residents as well as City residents and the vast numbers of the general public who use that area for recreation also have a stake in the outcome. If for whatever reason the mitigation measures outlined in the DEIR are not implemented, the alternate construction impact mitigation plan (TR-1-8) needs wider review than just the City of Palo Alto.

60.3

Con't

The clear policy on the the truck routes as set forth in the DEIR can serve as a very good start. But local experience has shown that communication of, and enforcement of, a trucking limit policy cannot be taken for granted. Both Junipero Serra Blvd. (JSB) and Stanford Avenue have had trucking limits as a matter of law (Santa Clara County ordinance) for years, yet compliance has been far from automatic. Santa Clara County has no budget for targeted enforcement, nor does CHP. The SUMC Project must not assume these mitigations will be self-enforcing nor added to the University burden.

For its own construction projects and ongoing services, Stanford University has made significant efforts to support the JSB and Stanford Avenue policies (and the law), by a program of communication with contractors and through penalties written into their contracts. As a start, we ask that the SUH project do likewise. Each new contractor needs to be apprised of the policy and the law, and take responsibility for their drivers, their subcontractors, and, over time, their new hires. Prominent posting of the Truck Routes and prohibited routes at job site entry and exit should help to some degree, along with wide distribution of the Route map.

Still, "education" only goes so far. "Truck Route Map? Oh, I think that's the thing I tossed on the floor of my truck to mop up some coffee I spilled," said one driver, when quizzed why he'd chosen to use a prohibited route.

Beyond education, we ask for some proactive enforcement (as opposed to complaint-driven) during construction hours. One natural opportunity might exist to do this at minimal marginal cost by making an arrangement with Stanford Public Safety, through the Community Service officer already stationed at the intersection of Stanford Avenue and Junipero Serra Blvd. In this area, violations impact not only other traffic and homes, but also the daily throngs of recreational joggers, bicyclists, and hikers. And from this checkpoint, there is perfect visibility to identify any violating vehicles both inbound and outbound on both JSB and Stanford Ave. Since the current duties of the person in this position are monitoring, this could combine well.

In summary, we applaud the policy on limiting truck routes, and request that it be made meaningful by ongoing enforcement in addition to policy education.

Thank you for the opportunity to comment.

Sincerely,

Jeannie Siegman
Tony Siegman

cc: Charles Carter, Stanford Univ.
Andy Cox, Stanford Hospital
Jean McCown, Stanford Univ.
Jim Sweeney, SCRL
Scott Strickland, SCC
60.  Jeannie and Tony Siegman (letter dated July 25, 2010)

60.1  *The commentor expresses support for the SUMC Project.*  The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA.  Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

60.2  *The commentor states that a commitment to implementation of the SUMC Project’s mitigation measures is required for effective mitigation.*  As explained in the Introduction Section on page 1-5 of the Draft EIR, if the SUMC Project is approved, the City of Palo Alto must adopt a Mitigation Monitoring and Reporting Program (MMRP), which would ensure that the mitigation measures presented in the Draft EIR are implemented.  Please see Master Response 11 for a description of an MMRP and the SUMC Project review and approval process.

60.3  *The commentor wants to ensure that the construction truck route mitigation measures, as outlined in the Draft EIR on page 3.4-44, are applied by the SUMC Project sponsors and enforced.*  As explained above in Response 60.2, the City would adopt an MMRP to confirm that all mitigation measures presented in the EIR are implemented.  Please see Master Response 11 for a description of an MMRP and the SUMC Project review and approval process.

*In addition, the commentor states that Mitigation Measure TR-1.8 should be revised to include review other than from the City of Palo Alto.*  As noted by the commentor, the construction truck routes would traverse Palo Alto, Menlo Park, and roads under the jurisdiction of Santa Clara County.  However, as the lead agency of the SUMC Project, the City of Palo Alto would be responsible for reviewing and approving construction activities with potential transportation impacts.  Nonetheless, Mitigation Measure TR-1.8 has been revised and requires that the City of Palo Alto provide a copy of the construction impact plan to the City of Menlo Park for review.  Please refer to Master Response 4 for revisions to Mitigation Measure TR-1.8.

60.4  *The commentor states that for its own construction projects and ongoing services, Stanford University has made significant efforts to support JSB and Stanford Avenue policies (and the law), by a program of communication with contractors and through penalties written into their contracts.  The commentor would like the SUMC Project do likewise.*  Mitigation Measures TR-1.1 through TR-1.9 address impacts during construction.  The ideas put forth in this comment can be considered as City staff reviews the construction traffic plans for the SUMC Project.  Please refer to Master Response 4 for a discussion of construction traffic.
From: Stonestrom [stones@igc.org]
Sent: Tuesday, July 27, 2010 9:41 AM
To: Stanford Project
Subject: Draft EIS for Stanford Hospital Expansion + Seismic Upgrade

To whom it may concern,

I am writing in support of allowing the expansion and upgrade to go forward despite the negative impacts on traffic congestion, etc.

We live in a seismically high risk region. When the next large earthquake happens, having a fully functioning hospital will be vitally important.

We live among a rapidly growing population. The number of hospital beds has not kept pace with this growth. Our hospitals must be allowed to grow with the population they serve.

The devil is in the details, and adjustments to expansion plans can and should be made to minimize and distribute detrimental impacts on adjoining communities. But the EIS process should not be allowed to unnecessarily delay this urgently needed project.

Sincerely yours,

David A. Stonestrom
1000 S. California Ave.
Palo Alto, CA 94306

61.1 The commentor expresses support for the SUMC Project. The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.

61.2 The commentor requests adjustments to the expansion plans in order to minimize impacts on adjoining communities. The Draft EIR analyzes the SUMC Project as proposed by the SUMC Project sponsors in the 2007 application, and as last amended in March 2010. As such, the Draft EIR does not make recommendations for reduced building programs.

However, alternatives to the SUMC Project are included in Section 5, Alternatives, of the Draft EIR. Per CEQA Guidelines Section 15126.6, an EIR must include a range of feasible alternatives that obtain most of the project objectives and reduce the impacts of the proposed project. Therefore, the Draft EIR analyzes seven SUMC Project alternatives that make adjustments to the proposed expansion plans in order to minimize the significant and unavoidable impacts identified in the Draft EIR. Included in the alternatives analysis are two No Project and two Reduced Intensity alternatives, which reduce the building program of the SUMC Project. Please refer to Section 5, Alternatives, of the Draft EIR for a complete description and analysis of all seven alternatives. Also, please see Master Response 8 for a discussion of the range of alternatives.

61.3 The commentor indicates that the delays in the EIR process should not delay approval of the SUMC Project. Reasons for the delay in completing the Draft EIR include site plan modifications and application updates by the SUMC Project sponsors in order to fulfill Office of Statewide Health Planning and Development (OSHPD) requirements; the withdrawal of the Stanford Shopping Center Project from the analysis of the Draft EIR; and changes in the City’s Traffic Model. This comment concerns the EIR process and does not concern the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 11 for a detailed description of the City’s review process and the next steps in the EIR review process.
As a physician and as a patient in the community, I support Stanford's Draft EIR because the community needs a great hospital. The facilities need upgrading per the State's seismic standards and the city of Palo Alto should be happy that Stanford is willing to foot the enormous bill to build a new hospital that will benefit the community of patients and healthcare workers but also bring business to the area. The increased traffic will not likely to be severe since Stanford is willing to pay for transport passes for all the workers that need them. Moreover, the area to be developed is already a commercial area. It is not being built in a middle of houses so really should not inconvenience anyone much.

We need a new hospital so the City of Palo Alto should support Stanford's efforts. The city should not forget that many of us live here because we have past or present ties to Stanford and our houses are worth more because of our proximity to Stanford!

Sue Tsung, MD
62. Soa Tsung, MD (letter dated May 28, 2010)

62.1 *The commentor expresses support for the SUMC Project.* The comment concerns the merits of the SUMC Project and does not address the adequacy of the Draft EIR or the SUMC Project’s compliance with CEQA. Please refer to Master Response 9 for a discussion of project merit in the CEQA process.
From: tv@work.net
Sent: Friday, May 28, 2010 10:32 AM
To: Council, City
Subject: Stanford Hospital

As a physician and as a patient in the community, I support Stanford's Draft EIR because the community needs a great hospital. The facilities need upgrading per the state's seismic standards and the city of Palo Alto should be happy that Stanford is willing to foot the enormous bill to build a new hospital that will benefit the community of patients and healthcare workers but also bring business to the area. The increased traffic will not likely to be severe since Stanford is willing to pay for transport passes for all the workers that need them. Moreover, the area to be developed is already a commercial area. It is not being built in a middle of houses so really should not inconvenience anyone much.

We need a new hospital so the City of Palo Alto should support Stanford's effort. The city should not forget that many of us live here because we have past or present ties to Stanford and our houses are worth more because of our proximity to Stanford!

Jaya Virmani, MD
63. Jaya Virmani, MD (letter dated May 28, 2010)

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