



# Planning & Transportation Commission

## Staff Report (ID # 8473)

---

**Report Type:** Action Items **Meeting Date:** 11/8/2017

**Summary Title:** Stanford GUP 2018: DEIR Comment Letter

**Title:** The Planning and Transportation Commission Will Review and Provide Comments on the Draft Environmental Impact Report Prepared for the Stanford General Use Permit (2018) Application and Provide Input to the City's Comment Letter

**From:** Hillary Gitelman

### Recommendation

Staff recommends that the Planning and Transportation Commission (PTC) review and comment on the Draft Environmental Impact Report (DEIR) prepared by Santa Clara County for the Stanford University 2018 General Use Permit (2018 GUP) amendment. The Commission's input will help to inform the City's comment letter on the DEIR.

### Report Summary

Santa Clara County distributed on October 4, 2017, a Notice of Availability (NOA) for the DEIR for Stanford's application for an amendment to their 2000 General Use Permit (2018 GUP). Based on the City's comment letter on the Notice of Preparation (NOP) and the conclusions of the DEIR, the City is in the process of preparing a response letter to the County identifying issues relating to the City. (Attachment A: NOP Comment letter) Comments are due to the County no later than December 4, 2017.

The Planning and Transportation Commission (PTC) is being asked to review the Stanford 2018 General Use Permit (2018 GUP) DEIR, particularly with regard to the adequacy of the document as it relates to the issues raised in the City's NOP comment letter. The California Environmental Quality Act (CEQA) defines the scope of environmental analysis and mitigation specifically to include those issues that relate to the environment and can be measured against accepted criteria. The DEIR document for the Stanford 2018 GUP and associated appendixes can be found on line at: [www.scc.org/sites/dpd/Programs/Stanford/Pages/GUP2018\\_CEQA.aspx](http://www.scc.org/sites/dpd/Programs/Stanford/Pages/GUP2018_CEQA.aspx); a link to the document was previously transmitted to the Commission on October 6, 2017

There are other – non-CEQA -- issues raised by the 2018 GUP project that affect the City of Palo Alto and are not included in the DEIR. These policy issues should be identified so the City can address them separately with the County and Stanford University. An initial list of the policy issues identified so far in the City's review also has been included in the Discussion section below for Commission review and comment.

## **Background**

In November 2016, Stanford University (Stanford) applied to Santa Clara County for a major modification of their 2000 General Use Permit known as the 2018 GUP, with associated amendments to the Stanford Community Plan in the Santa Clara General Plan and to some zoning designations to conform to existing and planned conditions. The application for development is wholly within Academic Growth Boundary (AGB), central campus, located in Santa Clara County. The request that is addressed in the DEIR includes the following development within the AGB between 2018 and 2035:

- 2,275,000 SF net new academic and academic support space;
- 3,150 net new housing units/beds of which up to 550 units would be available for faculty, staff, postdoctoral scholars and medical residents;
- 40,000 SF net new of childcare center space and other space that reduces vehicle trips (e.g., transit hub);
- Use of up to 50,000 SF of construction surge space authorized under the 2000 General Use Permit;
- Use of the remaining unbuilt parking authorized under the 2000 General Use Permit (estimated at 1, 480 spaces remaining after completion of the Escondido Village Graduate Residences and associated parking in 2020) [There are an estimated 3,156 remaining unbuilt parking spaces as of Fall 2015];
- Creation of a parking reserve for up to 2,000 net new parking spaces (with County Planning Commission approval);
- Associated infrastructure.

As lead agency Santa Clara County (County) is responsible for preparing the environmental document for the Stanford project, 2018 GUP. The Stanford 2018 GUP DEIR was released for public review on October 6, 2017. (Attachment B- Notice of Availability) In accordance with the California Environmental Quality Act (CEQA), comments on the DEIR are due within 60 days, December 4, 2017. Staff is currently preparing a draft comment letter for consideration by the City Council on November 27, 2017. The Commission's input at this evening's meeting can inform preparation of that letter and will be made available to the City Council.

## **Discussion**

City staff and the City's environmental consultant are in the process of reviewing the 2018 GUP DEIR to determine the adequacy of the analysis regarding impacts and mitigations affecting the City. So far the following lists of technical and policy issues have emerged and are being studied for inclusion in the City's comment letter.

## Technical Issues

- EIR Assumptions
  - 2018 Baseline is not clearly identified or quantified and it is not clear whether the 2018 baseline condition includes development under construction in adjacent jurisdictions. Further, the concern is whether the 2018 baseline scenarios are carried consistently through all analyses and, as a result, whether all pending and proposed Stanford development is adequately addressed.
- Land Use – Project Description
  - Additional housing beyond the proposed limit of 3,150 units and or changes in distribution of academic, academic support, housing may be requested by Stanford as condition of permit. Although this would be subject to additional environmental review and County approval, there is concern about the flexibility and resulting impacts that could happen with changes in type and distribution of academic, academic support, housing throughout the AGB.
  - Future locations for development in the DRAPER district along El Camino Real between the Arboretum and the new graduate housing accessed from Stanford Avenue is not defined. Without better definition some environmental impacts of the proposed 200,000 square feet of academic and academic support development on immediately adjacent Palo Alto neighborhoods cannot be assessed, such as aesthetics, tree removal, traffic/transportation and parking.
- Population and Housing
  - Accuracy of the Stanford off-campus housing demand projection within Palo Alto is also a concern and whether population/household size estimates used in the DEIR analysis are consistent with current City projections.
  - Given the role of Stanford as a nationally recognized research institution with plans to increase the faculty during the project period, the accuracy of Stanford's projections of graduate student and postdoctoral population cohorts that will affect the demand for off campus housing should be reviewed.
- Traffic and Transportation
  - There are several concerns with the “No Net New Commute Trips” program wording, methodology and feasibility. The three key areas of concern are the definitions of the peak periods to be monitored, the direction of travel to be monitored, and the unlimited use of trip credits to meet the goal.
  - Trip generation rate is based on traditional peak periods that potentially underestimate impacts of project trips and traffic impacts.
  - The assumptions for adequacy of transit capacity and performance analysis for transit and Caltrain may not be accurate.
  - Parking concerns include the following issues:
    - The impact on trips of buildout of the parking space carry over from the 2000 GUP and requested Parking Reserve in the 2018 GUP.

- How parking management will impact the effectiveness of the TDM program.
- Further clarification of the off campus parking impacts.
- o Intersection impacts and specific mitigations including Caltrain grade separation at Alma and Charleston need to be addressed.
- o Impacts of additional trips on freeway segments are not adequately addressed.
- o Finding of less than significant impacts to residential streets and bicycle/pedestrian facilities.
- Construction Impacts – Air and Noise
  - o Concern that construction-related air emissions, including diesel emissions, and noise are not adequately addressed for example changes in travel distances for solid waste disposal during the project period.
  - o Construction noise and noise mitigation when proximate to Palo Alto should reflect Palo Alto policies and regulations.
- Public Services
  - o There is concern regarding provision for adequate fire and emergency service protection for future buildout.
  - o Continued, safe access for fire, police and emergency services throughout construction needs to be more thoroughly addressed.
- Other
  - o *Visual and Aesthetics*: Design-performance standards i.e. buffers, screening, for projects adjacent to the City is not provided.
  - o *Cultural*: Stanford's historic campus interfaces with the City of Palo Alto at the Main Gate / Palm Drive/the Oval which is an extension of the Main Quadrangle Block and should be provided better long term protection.
  - o *Hydrology*:
    - Does not adequately address effects of project on run-off and downstream flood control particularly on San Francisquito Creek and whether there is adequate capacity in detention basins for groundwater recharge.
    - Analysis of impacts of long term groundwater use on adjacent wells and coordination aquifer storage with other jurisdictions is not adequate.
- Cumulative Impacts
  - o In some cases the cumulative impact analyses are inadequate and need to be revisited.
  - o The projected growth of neighboring communities and other Stanford University off-campus developments are not properly addressed.

### Policy Issues

Policy issues are general and/or policy concerns that are outside the limits of a strict CEQA analysis. These are issues that are important as the City discusses the project application with the County and Stanford. The following policy issues have been identified so far:

- Protection of foothills from future development is not addressed. Currently under the Stanford Sustainability Study (2009) the AGB could be changed by the County with an easier procedure after 2025 or when 17.5 million square feet of academic space is developed.
- Stanford should to meet more of its housing demand on campus than proposed and the County should be prepared to accept some of the City's RHNA allocation in the next housing element cycle as they did for the 2007-14 cycle.
- Because of the close interface with the Central Campus area (AGB), the City of Palo Alto anticipates the need for fee contributions for housing, use of City recreation facilities, and transportation/transit services and facilities including Stanford/community bicycle access and safety improvements.

### City Review of DEIR

Relevant City departments including Public Works, Community Services, Police, Fire, Emergency Services, Traffic and Transportation and Planning also have been involved in the review to identify local and interface issues. On October 16, Santa Clara County presented the DEIR to the City Council. At this Council study meeting the Council members identified some of their issues of concern. The County also held additional public comment meetings in Palo Alto on October 12 and October 19, 2017. A final County public comment meeting with the County Planning Commission will be held in Palo Alto on November 30, 2017.

The City's current review process is continuing with this PTC input. To meet the December 4 deadline, the conclusion of the entire City input will be put into a comment letter. The City Council will review the letter on November 27, 2017.

### **Next Steps**

PTC input is important as Staff is in the process of drafting a comment letter on the Stanford 2018 GUP DEIR. For your reference the key technical and policy issues identified so far have been included in this staff report. The NOP comment letter (Attachment A) also may assist Commissioners as you consider your comments.

Staff will prepare a comment letter on the 2018 GUP DEIR. The Council will review the comment letter at their meeting on November 27, 2017. The staff will submit the approved letter to the County by the December 4, 2017 deadline.

Santa Clara County representatives have indicated that they expect a Final Environmental Impact Report (FEIR) to be available for review in the Spring of 2018 and that the Board of Supervisors will consider the FEIR and project mid-2018.

### **Environmental Review**

This is an opportunity for the Planning and Transportation Commission to comment and no decision will be made requiring CEQA review. Ultimately, if the County approves Stanford's GUP proposal, it will be after completion of the EIR process and subject to required CEQA

findings. Under Section 15381 of the CEQA Guidelines and Section 21069 of the CEQA Statute, the City of Palo Alto is a 'responsible agency', which is a public agency, other than the lead agency (Santa Clara County), responsible for carrying out or approving components of the project. Items requiring City approval include any physical improvements within the City limits – including mitigation measures – as well as any agreements or contracts between the City and the University and/or the County related to implementation of the Stanford GUP.

### **Public Notification, Outreach & Comments**

Notice of the November 8, 2017 PTC meeting to discuss the 2018 GUP DEIR was published in the [Palo Alto Weekly](#) on October 27, 2017. In addition Santa Clara County presented the DEIR to the City Council on October 16, 2017. Santa Clara County has held two public meetings in Palo Alto for comment on the 2018 GUP DEIR, October 12 and October 16, 2017. The Santa Clara County Planning Commission will also hold a public meeting in Palo Alto to take comments on November 30, 2017.

#### **Report Author & Contact Information**

Meg Monroe, Management Specialist  
(650) 329-2425  
[margaret.monroe@cityofpaloalto.org](mailto:margaret.monroe@cityofpaloalto.org)

#### **PTC<sup>1</sup> Liaison & Contact Information**

Jonathan Lait, AICP, Assistant Director  
(650) 329-2679  
[jonathan.lait@cityofpaloalto.org](mailto:jonathan.lait@cityofpaloalto.org)

#### **Attachments:**

Attachment A: City of Palo Alto Comment Stanford University's Application for a 2018 General Use Permit, letter, March 7, 2017.

#### **Attachments:**

- Attachment A: City of Palo Alto Comment letter on Notice of Preparation for Stanford GUP2018, March 7, 2017 (PDF)

---

<sup>1</sup> Emails may be sent directly to the PTC using the following address: [planning.commission@cityofpaloalto.org](mailto:planning.commission@cityofpaloalto.org)

March 7, 2017

County of Santa Clara Planning Office  
**Attention: David Rader**  
County Government Center  
70 West Hedding, 7<sup>th</sup> Floor, East Wing  
San Jose, CA 95110

**Subject:** Stanford University's Application for a 2018 General Use Permit

Dear Mr. Rader,

Thank you for the opportunity to comment on the scope of the EIR being prepared to evaluate Stanford University's application for a 2018 General Use Permit (GUP). Members of the Palo Alto community are keenly interested in this project, and the City Council is happy to provide comments to inform preparation of the DEIR and its technical analyses. At the end of this letter, we have also identified a number of shared concerns that we look forward to working on with you as the County considers Stanford's application.

**Project Description**

We understand that the University has requested approval of 2.275M square feet of academic and academic support space, 3,150 dwelling units or beds (approximately 450 of which would be classified as affordable units), and 40,000 square feet of additional building space for child care and Transportation Demand Management (TDM) program administration. We further understand that all of this would occur within the current Academic Growth Boundary and that concurrent changes to the Stanford Community Plan and zoning would be extremely limited in scope, essentially reflecting existing use of limited areas, and adoption of the County's housing element several years ago.

While the magnitude of this proposal means that it will require careful review, we applaud the University's long term commitment to the Academic Growth Boundary and to managing the impacts of growth. Throughout the planning process, we will be seeking as much certainty as possible regarding the number of students, staff, employees, and residents that will be accommodated by the proposed development over time, and on ways the County will ensure that the intensity of use on campus will not increase unless clear performance standards (established as mitigation measures or conditions of approval) are met. We will also be

interested in fully understanding the relationship between on-campus development and the various land uses and developments that the University has or is developing at off-campus locations within Palo Alto and nearby jurisdictions. Our community deserves a comprehensive description of the University's footprint in the region, and a full accounting of its cumulative impacts and benefits if the 2018 GUP is approved as proposed.

### **Aesthetics & Cultural Resources**

Given the flexibility and performance criteria that are the underpinning of the 2018 General Use Permit (GUP) proposal, the City is concerned that we will not be able to adequately assess the impacts of proposed development without specific information on the location and scale of the proposed changes. The DEIR should carefully identify scenic resources, including mature vegetation and historic resources that may be affected, and should identify those resources that are likely to be impacted by the proposed development program. A specific performance standard should be identified to minimize or avoid potential impacts through alternatives, and mitigation measures should provide for review and consultation with the City of Palo Alto as each development proceeds.

### **Air Quality, Green House Gas Emissions, Noise, & Vibration**

With the similarities in the amount of development in the 2000 GUP and 2018 GUP within the academic growth boundary and the almost continuous construction we have experienced during the 2000 GUP, a detailed study of the impact of construction is needed. Construction activities and construction equipment will have an ongoing impact on air emissions and noise and vibration. The DEIR should provide a quantitative analysis of air emissions and noise/vibration attributable to construction (including the use of heavy equipment, construction worker traffic, etc.), and provide appropriate control measures.

### **Land Use & Biological Resources**

The EIR should address the proposed changes in land use and open space within the academic growth boundary, as well as potential impacts resulting from activities and mitigation measures that extend outside that boundary. Please be specific regarding any existing land uses that will be replaced. For example, will the 200,000 SF of academic and support development proposed in the area of the playing fields on El Camino Real (DAPER development district) affect the continued use of this area for recreation, intramural sports events, and parking for major events at the stadiums? Will rezoning of the driving range affect that existing land use?

The study should extend to include impacts from corollary uses and development on other Stanford lands located in Palo Alto, including new off-site housing, non-residential uses in the East Bayshore Area, at the Stanford Research Park, the Stanford University Medical Center and at the transit center site.

### **Hazards and Hazardous Materials**

Palo Alto's regulations governing the use of hazardous materials in proximity to sensitive receptors (such as residences) are evidence of this community's concern regarding this issue. The DEIR should describe current and potential future hazardous materials uses on site with some specificity with regard to type and location. The DEIR should also describe ways to ensure that sensitive receptors are not adversely impacted in the event of an unexpected release of hazardous materials caused by human error or an emergency (fire, earthquake, and explosion). The notification and safety of first responders to such an event involving hazardous materials should also be addressed.

### **Hydrology and Water Quality**

While Stanford proposes to avoid an increase in impervious surfaces, thereby avoiding an increase in storm water flows, the EIR should describe existing deficiencies (i.e. downstream flood risks) that existing flows contribute to. A study of potential flood control measures should be included along with a discussion of upstream control measures and protections.

The city understands that Stanford uses groundwater for irrigation purposes and that there is a countywide groundwater study ongoing. The aquifer is shared by Stanford and a number of jurisdictions, and the capacity and availability of water from this source will affect Palo Alto and other jurisdictions, particularly during drought years and in the event of region wide emergencies. The DEIR should quantify any expected increase in Stanford's use of groundwater, and provide some discussion regarding the health of the aquifer. If increased groundwater use is expected, we request that the DEIR discuss and evaluate plans for recharge of the aquifer from detention basins, including dams/reservoirs, and creek management. Mitigations should be included in the form of recharge areas so that the basin can meet the available supply needed by Stanford and others drawing from the aquifer in years of drought and variable water supply. Ideally, detention basins also can be planned to help alleviate the flood risks referred to above.

The City of Palo Alto provides wastewater treatment for Stanford University including transport for the wastewater to the treatment facilities located on the Bayfront. The DEIR should include a detailed study of the impacts of development proposed over the 17-year period of the 2018 GUP on the city's wastewater treatment plant capacity and treatment facilities. The impact on the location and capacity of the collection system, both on campus and through the city to the treatment facilities, should also be studied. Appropriate mitigations to any impacts should be identified and addressed.

### **Population and Housing**

As noted earlier, the City will be looking for detailed information about the number of new students, staff, and residents that would be accommodated on and off-campus by the development Stanford is proposing between today (the appropriate CEQA baseline) and 2035 (the proposed horizon year). Along with the population analysis, we would appreciate an assessment of housing demand, including existing and future demand by employees and

students qualifying for below market rate housing. The study should quantify housing demand inside and outside the Academic Growth Boundary and indicate how the supply of housing on campus, existing and projected, correlates with this demand, and should identify areas where those who are not provided housing on campus are likely to seek housing.

Section 5 of the application materials notes that with 550 new multiple family housing units occupied by faculty and staff on Stanford owned lands in unincorporated Santa Clara County there will be 275 additional school-aged children by 2035 (assuming 0.50 school aged children/dwelling). The City would ask for a clarification of 'multiple family' since many of the units built during the 2000 GUP particularly along Stanford Avenue were free standing single family units in close proximity to one another. More detailed study needs to be made of the family size of the current Stanford graduate, post doctoral, faculty, and staff living on campus since this is a unique population. An accurate estimate of the age range within the pre-school and school aged population is important in order to determine the impacts of these additional children on city facilities including safe routes to school, bicycle trails and travel routes, recreation needs. This analysis will also define the need for the 2018 GUP to address providing the additional square footage to meet demands for daycare and other on campus services and their related traffic impacts. Impacts on the Palo Alto Unified School District's capacity and services should also be addressed.

The City strongly supports the housing linkage/ratio concept used in the 2000 GUP and its continued use in the 2018 GUP. The proposed ratio is 605 new beds for every 500,000 SF of new academic and academic support space. The City would urge that the housing become available as close as possible to the availability of the new academic space. The City also appreciates the University's proposal to continue funding affordable housing projects elsewhere in the region, and supports continued use of a six-mile radius from campus for expenditure of these funds, with an additional focus of such development on transit corridors within that radius.

We also understand that Stanford is seeking a condition that would allow it to build additional housing beyond the proposed development limit of 3,150 housing units/beds proposed in the 2018 GUP. We have no objection to this proposal, as long as the environmental review effectively addresses potential impacts and/or provides a mechanism to do so, if and when, these additional housing units/beds should be proposed.

### **Public Services**

Under contract with Stanford University, the City of Palo Alto Police Department Palo Alto 9-1-1 Communications Center (a.k.a. Public Safety Answering Point (PSAP)) provides 9-1-1 call taking service for the University campus and dispatches the Stanford University Department of Public Safety. The DEIR should provide a detailed study of how the demand for these services will increase as the 2018 GUP progresses and is completed.

The City of Palo Alto Office of Emergency Services (OES) works closely with Stanford University on topics related to natural disasters, technological and accidental hazards, and human-caused events, such as crime and terrorism. In particular, the Stanford University Department of Public Safety (SU DPS) and the Stanford University Environmental Health & Safety (EH&S) group routinely work with OES to conduct joint training, emergency planning, and work together on planned special events and other higher-risk events. Some clarification is needed in Section 8.5, Emergency Preparedness and Response, of the application materials. Specifically, the Background Conditions Report verbiage has to do with Palo Alto Fire Department and related topics, not emergency preparedness. The OES is a separate City Department. OES operations are closely aligned with the Palo Alto Police and Fire Departments and the 9-1-1 Communications Center. Stanford University generally receives support by OES at no additional charge despite many shared activities.

The Palo Alto Fire Department (PAFD) has been providing fire, rescue and emergency medical services (EMS) to Stanford University (Stanford) under contract since 1976. Under the proposed 2018 GUP, additional public safety impacts would be created by the increase in residential and daytime populations as well as construction and regular traffic impacting already congested road networks. The city understands that a court decision, *City of Hayward v. Board of Trustees of the California State University*, 242 Cal. App. 4<sup>th</sup> 833 (2015) minimizes the environmental impacts under CEQA related to emergency services. However, these effects as they relate to the 2018 GUP proposal should be studied in detail in the DEIR. Without mitigation the ability of the PAFD to meet acceptable performance standards could be negatively impacted by the anticipated growth impacting public safety.

The PAFD notes that they have been challenged to meet the response time performance noted in the 1976 contract as well as in the 2000 GUP and updated annual reports. The primary reason for response time performance challenges have been due to increased calls for service, the frequency of simultaneous calls for service, the location of the fires, speed limits, and the frequency of detours and lane closures due to construction activities. The DEIR should assess how the 2018 GUP will affect response times and provide appropriate mitigations.

## **Recreation**

The NOP states that the DEIR will describe the environmental setting for parks and recreation, discuss the potential for increases in the use of non-Stanford recreation facilities so that substantial impacts could occur, and assess whether the construction of any proposed recreational facilities would have a significant effect on the environment. The DEIR should also address impacts and appropriate mitigations for impacts on City park and recreation facilities including available parking, over-use of recreational facilities, parks, open space trails and habitat. The study should include impacts to city recreational programs, including youth camps and classes resulting from an increased number of Stanford campus residents and employees. Will the soccer field at El Camino Real and Page Mill Road be preserved long term?

The Stanford application for the 2018 General Use Permit states that due to the size of the district and regional parks (Foothill Park/Open Space Preserve, Baylands Nature Preserve, and Pearson-Arastradero Preserve), increased visitor ship is less likely to lead to substantial deterioration. The application refers to the low increases in visits per acre for district and regional parks shown in Section 16, Table 7 to demonstrate that such projected increases in visits per acre are negligible given the size of the parks. The City of Palo Alto disagrees with these statements because -- although the open space preserves are large -- the areas where people actively recreate are a very small percentage of the entire preserve area. The impact of concentrating more people into these areas should be studied and identified impacts should be addressed with appropriate mitigation.

In Section 16, Parks and Recreation Analysis, of the application materials, Stanford includes a section assessing recreation impacts on nearby public park and recreation facilities located in the City of Palo Alto focusing on the College Terrace neighborhood. The city notes that the number of visitors per day cited (41 visits to Foothills Park, 32 visits to the Baylands, and 27 visits to the Pearson Arastradero) clearly demonstrate that visitation to parks by Stanford campus residents is not limited to the nearby College Terrace parks, and appropriate mitigation should include a larger area. Please consider whether provision of funding for acquisition of new parkland (in addition to funding to address impacts on existing parks) would address identified impacts.

The premise of the 2018 GUP involves concentration of uses within the core campus, increasing the density of the population within the academic growth boundary and requiring new construction that will reduce open space from 15.1 acres/1000 in the Fall of 2018 to 12.2 acres/1000 at build out of the 2018 GUP. While infill development is preferable to the alternative, the City requests an assessment of how any changes open space within the Academic Growth Boundary might affect recreational uses/facilities on and off-campus.

### **Transportation & Circulation**

Members of the Palo Alto community appreciate the University's focus on reducing commute trips to/from campus by single occupant vehicle (SOV) during peak commute hours but are increasingly skeptical that the University's trip reduction programs are living up to their promise. We would ask the County to take a hard look at how the "no net trips" goal is structured, starting with the baseline, and including the methodology, reporting, peer reviews, and penalties for not achieving the promised results.

As the basis for this analysis, the DEIR should include the following data collection and background information:

- 1) Identify peak travel periods for the campus based on vehicle volumes collected across an entire day. Due to the University's unique land use mix, the city is interested in understanding how travel patterns may differ from typical morning and afternoon peak periods. Consider using the 24-hour cordon count data from the most recent version of the *Stanford University Traffic Monitoring Report*.
- 2) Identify the University's existing and planned primary and secondary transit corridors, especially within the Campus Drive ring-road, as this area is described as limited to most motorized vehicles. Primary corridors should be routes with frequencies greater than 15 minutes in the peak periods.
- 3) Additional background information is needed on transit serving the University: Include an inventory of applicable local and regional transit lines serving the project area, their ridership, capacity, and utilization.
- 4) The Marguerite is the backbone of the University's transit system. Please include current performance data such as boardings, speed, and frequency for individual lines.
- 5) Consider estimating person trip generation and then estimate mode split. Mode split estimates may be important to assist with impact analysis for transit capacity.

Based on information provided in the application materials, the DEIR traffic impact analysis should include the following items:

- 1) Include intersection, freeway segment, and ramp impact assessment consistent with the latest version of the Valley Transportation Authority's TIA Guidelines.
- 2) Evaluate impacts to emergency response times.
- 3) Evaluate transportation-related construction impacts including capacity impacts to roadways.
- 4) Pending review of daily vehicle volumes, reset the "no net new trips" baseline, as peak hours, periods, and directions may have changed since 2001.
- 5) Evaluate transit performance and efficiency as it relates to site design, mobility, and access.
  - a. Consider setting transit performance metrics such as speed, passenger travel time, boardings/hour. The city is concerned that dispersed development patterns may result in inefficient transit routes
  - b. Of the major transit corridors identified, show the location of development areas relative to ¼ mile walksheds around stops. It is unclear whether transit accessibility was considered as a factor when the distribution of growth was proposed.

- c. Include a qualitative discussion around the optimal land use and site design principles that support effective, user-friendly, and efficient transit networks. Evaluate the transit system serving the University with these principles.
- 6) Assess demand, capacity, and utilization of Caltrain servicing the Downtown Palo Alto Intermodal Transit Center in all scenarios. Many peak-period trains already exceed capacity. How will impacts on Caltrain be addressed, and how will current conditions impede the University from meeting its TDM goals?
- 7) Assess demand, capacity, and utilization of connecting transit services at the Palo Alto Intermodal Transit Center (PAITC). Consider requiring improved circulation and access to the transit center for transit vehicles as a prerequisite for additional development. Transit service would be greatly enhanced with improved access from El Camino Real.
- 8) Assess the performance, capacity, access, and operations of transit, bicycles, and pedestrians the Palo Alto Intermodal Transit Center (PAITC). Include capacity assessment for bus bays, layover facilities, and potential operational impacts to other transit providers using the PAITC.
- 9) Evaluate the relationship between mode and distance travelled to the University. Similar recent evaluations have shown persons who travel 3-5 miles may be the most likely to drive, but are still within biking distance of their destination.

When evaluating the “no net trips” methodology, please account for lengthening of “peak” traffic conditions as the University shifts more and more trips to traditionally off-peak or shoulder periods. Also consider ways to simplify the accounting process and make the annual counts and calculations more transparent to the public.

The traffic analysis should also study the extent to which Stanford commuters are avoiding cordon counts by parking on local streets in adjacent city neighborhoods. The DEIR should assess the magnitude of this practice, and propose a realistic program for addressing these “hidden” vehicle trips and the neighborhood parking problems they create.

The DEIR should identify critical intersections on bicycle routes that currently have inadequate integration of bicycle facilities and determine needed improvements to facilitate the No Net New Commute Trips program going forward. This should include an evaluation of Stanford population’s use of these locations and their impact on the need for improvements.

The City of Palo Alto appreciates the University’s proposal to support the City’s Safe Routes to School program via “walk and roll” improvements needed for Escondido and Nixon Elementary Schools. To continue this cooperative effort, the City would ask that the DEIR study

the impacts of the 2018 GUP on other school routes and expand their support to include improvements needed for Terman and Jordan Middle Schools and Gunn High School.

Finally, if the County seeks to off-set trips that cannot be reduced by requiring payments to agencies or organizations like the Palo Alto Transportation Management Association, these should be negotiated in advance, and not on an annual basis when we learn whether the University has or hasn't met its goal. This is because successful TDM programs require thoughtful planning and consistent funding; they cannot be funded on an ad hoc or intermittent basis.

### Other Issues

There are a number of issues that warrant discussion outside of the EIR process and the City would be interested in discussing these with County representatives as the Draft EIR is being prepared. These include several issues identified in the comments above: upstream detention of storm water flows; compensation for Stanford-related impacts to City parks and recreation facilities; support for pedestrian and bicycle linkages; and support for transit services/access improvements including the Palo Alto Intermodal Transit Center and TDM programs. These issues also include extension of the University's 25-year foothills protection commitment, "fair share" contributions to neighborhood Residential Preferential Parking (RPP) programs, the project's proposal to provide below market rate housing, and the opportunity to execute a transfer agreement for the next Regional Housing Needs Allocation (RHNA) cycle similar to the agreement that was negotiated concurrent with the 2000 GUP.

Thank you for the understanding you have shown the City in providing time for the preparation of these responses. We encourage County staff to contact the City with any questions you might have or information you might need during the environmental review process. If you have any questions regarding these comments please reach out to me or Hillary Gitelman, Director of Planning and Community Environment, at (650) 329-2321 and [Hillary.gitelman@cityofpaloalto.org](mailto:Hillary.gitelman@cityofpaloalto.org).

Sincerely,



Mayor H. Gregory Scharff  
City of Palo Alto

CC. Santa Clara County Supervisor Joe Simitian  
Palo Alto City Council Members

**James Keene, City Manager**

**Jean McCown, Stanford University Director of Community Relations**

**Catherine Palter, Stanford University Land Use and Environmental Planning**

**Kirk Girard, Santa Clara County Director of Planning & Development**

**Hillary Gitelman/Margaret Monroe/File**