



# City of Palo Alto

## City Council Staff Report

(ID # 7519)

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**Report Type: Action Items**

**Meeting Date: 3/6/2017**

**Summary Title: Stanford GUP Draft Comment Letter**

**Title: Review and Direction to Staff Regarding Comments on the Preparation of and Environmental Impact Report for Stanford University's Application for a Major Modification to Their General Use Permit With Santa Clara County**

**From: City Manager**

**Lead Department: Planning and Community Environment**

### **Recommendation**

Staff recommends that Council review the draft letter in Attachment A, make desired adjustments, and direct staff to transmit a final letter to Santa Clara County with the City's comments on the scope of the Environmental Impact Report (EIR) being prepared regarding the proposed amendment to Stanford University's General Use Permit.

### **Executive Summary**

On November 28, 2016, Stanford University (Stanford) submitted an application to Santa Clara County (County) for a major modification to their 2000 General Use Permit (GUP) with an associated amendment to the County's General Plan (specifically the Stanford Community Plan), and amendments to some zoning designations to conform to existing conditions.

Stanford's application will be reviewed by Santa Clara County and requires preparation of an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA). The County issued a Notice of EIR Preparation (NOP) on January 10, 2017, which is provided as Attachment B, and has invited the City to comment on the scope of the EIR. The County also provided the City with some additional time to comment, such that the City's written comments are due at the Santa Clara County Planning Department no later than March 10, 2017.

City staff from multiple departments have contributed to the draft letter provided in Attachment A, which focuses on CEQA-related comments but also highlights a number of other

issues that will require coordination between the City, the County, and Stanford.

## Background

Stanford is proposing an amendment to their 2000 General Use Permit, referred to as the 2018 GUP, which would authorize:

- 2.275 million net new square feet of academic and academic support space
- 3,150 net new housing units (2,600 student beds, 550 DU staff and faculty)
- Up to 40,000 net new square feet of child care centers and facilities to support trip-reducing uses
- Continued use of 50,000 SF of temporary trailers for surge space during construction.

Stanford University's contiguous lands occupy 8,000 acres, with 4,017 of these acres in unincorporated Santa Clara County. The Academic Growth Boundary occupies 1,370 acres of the area located within Santa Clara County. Fourteen percent (1,161 acres) of Stanford owned lands are located within the City of Palo Alto.<sup>1</sup>

The development of the Stanford land in unincorporated Santa Clara County currently is subject to conditions of approval in the 2000 GUP. The 2000 GUP authorized the development of 2.035 million square feet of net new academic space and 3,018 net new housing units. In March 2016, the Santa Clara County Planning commission authorized an additional 1,450 housing units for total authorized housing units of 4,468 net new units. As of December 2015, 769,354 SF of academic buildings remained to be built under the 2000 GUP.

Stanford's recent application states that the entire allocation of academic space and housing in the 2000 GUP will be permitted/built by 2018, completing the total request of the 2000 GUP including the additional housing units. Therefore the requested development in the 2018 GUP will be in addition to that approved in the 2000 GUP.

During the 2000 GUP period (2000 to 2017) Stanford also built the following 1,256 dwelling units (not including health care beds) on Stanford land outside of the Academic Growth Boundary:

- Senior housing at the Vi (388 independent living units, 106 beds in a Health Center)
- Stanford West, Sand Hill Road (628 faculty/staff units-156 below market rate)
- University Terrace under construction completed by 2018 (180 faculty units)
- 2500 El Camino Real (70 units below market rate)

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<sup>1</sup> Distribution of Stanford lands by Jurisdiction: Santa Clara County 4,017 a. 49%; Palo Alto 1,161 a. 14%; San Mateo County 2,710 a. 33%; Woodside 114 a. 1%; Menlo Park 111 a.1%; Portola Valley 76 a.1%. Source: Stanford Community Plan, pg. 2. These numbers do not include land that Stanford may have purchased recently in Redwood City, Mountain View or other areas.

### Public Outreach

The County required public outreach following submittal of the application, and on January 25, 2017, Stanford presented its proposal at a public meeting at the Mitchell Park Community Center here in Palo Alto. At the City's request, Stanford also presented its proposal at a City Council meeting on February 27, 2017 (rescheduled from February 6, 2017). In addition, the County conducted a public scoping meeting on February 8, 2017 at the Art Center in Palo Alto. Public comments on the scope of the EIR were also invited in writing by the close of business on February 17, 2017, (the County granted the City an extension to March 10, 2017).

Following preparation of the Draft EIR, the County will hold public hearings on the draft and invite additional comments. It will be important for the City and other interested parties to review the Draft EIR to ensure that comments and suggestions made during the scoping period have been addressed. This is also the time when the City will have to ensure that the Draft EIR adequately discloses potential impacts and feasible mitigation, and that the EIR will meet the City's needs if it is called upon to make decisions as a "responsible agency" under CEQA. Possible City decisions include encroachment permits for the use of City streets and approval of off-campus improvements proposed as part of the application or as mitigation. For example, the present application includes a one-time contribution for park maintenance in the College Terrace neighborhood based on projected use by new Stanford population.

### City Comments

The City's draft comment letter requests that the Draft EIR evaluate all of the potential environmental impacts related to Stanford's proposed development between today and 2035.<sup>2</sup> The letter also requests an evaluation of cumulative impacts arising from the current application and other development on Stanford lands, focusing on those in Palo Alto. Additional comments focus on specific environmental issues of concern, posing questions and requests regarding the EIR analysis and mitigation. Environmental issues typically addressed in an EIR include the following:

- Aesthetics/Cultural Resources
- Air Quality
- Biological Resources
- Greenhouse Gas Emissions
- Hazardous and Hazardous Materials
- Hydrology and Water Quality
- Land Use

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<sup>2</sup> While Stanford has proposed a baseline of 2018, CEQA practice is to evaluate impacts against the baseline of conditions existing at the time of the Notice of Preparation. County planning staff will have to consider this issue carefully and ensure the Draft EIR is both consistent with the law and understandable for a layperson who might not be familiar with the 2000 GUP and its current status.

- Noise and Vibration (addressed in Traffic)
- Population
- Housing
- Public Services (Police, Fire, Emergency Services)
- Recreation
- Transportation and Circulation (includes parking and bicycle access)
- Cumulative Impacts
- Growth Inducement
- Alternatives to the Requested Action, including an Environmentally Superior Alternative

As the Stanford application for the 2018 GUP proceeds through the review process at the County there are also a number of issues outside of the environmental analysis that the City will want to pursue with both the County and Stanford. Among these is negotiation of a Regional Housing Needs Assessment (RHNA) Transfer Agreement similar to the one that accompanied the 2000 GUP.

### **Resource Impact**

There are no resource issues associated with submittal of the City's comment letter; however when the Draft EIR is released, there may be a need for the City to hire technical experts to review the document. Also there maybe some costs to the City based on the implementation of the 2018 GUP that is finally approved; these will be better determined when the Draft EIR is available.

### **Timeline**

The response to the Notice of Preparation is due no later than March 10, 2017 to the Santa Clara County Planning Department. County staff indicates that it will take 10 to 12 months (February 2018) to complete the Draft EIR. The City will be given a minimum of 45 days to review and comment on the Draft EIR. The environmental document must be certified before the County can act on the 2018 General Use Permit application. Based on the experience of the 2000 GUP, the County's action on the application is likely to occur in late 2019 to 2020.

### **Attachments:**

**Attachment A: Draft Commente Letter (Will be provided "At Places") (TXT)**

**Attachment B: GUP Notice of Preparation (PDF)**

**Public Comments (PDF)**

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In order to reflect Council comments provided at the February 27, 2017 study session, the City's draft letter will be provided "at places" on March 6, 2017.



**NOTICE OF PREPARATION OF AN  
ENVIRONMENTAL IMPACT REPORT  
FOR THE  
STANFORD UNIVERSITY "2018 GENERAL USE PERMIT"**

**Project Applicant:** Stanford University  
**File Number:** 7165-16P-16GP-16Z-16EIR  
**Application For:** Major Modification to Stanford University's General Use Permit, Community Plan Amendment, Zoning Amendment

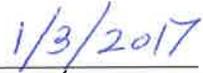
As the Lead Agency, the County of Santa Clara will prepare an Environmental Impact Report (EIR) for the proposed project and would like your views regarding the scope and content of the environmental information to be included in the EIR. On November 21, 2016, Stanford University submitted an application to the County to update its General Use Permit (hereafter collectively referred to as the "2018 General Use Permit"), amend the Stanford Community Plan, and amend zoning designations for some parcels to conform to existing conditions on the ground. A brief description of the proposed project, its site boundary, and a summary of the potential environmental effects are attached. The EIR may be used by your agency when considering approvals for the project. The County will make the ultimate determination regarding what level and type of development is approved under the project and what conditions of approval and mitigation measures and/or project alternatives may be imposed.

A Public Scoping/Community Meeting to solicit comments for the Notice of Preparation will be held at the Palo Alto Arts Center auditorium located at 1313 Newell Road, Palo Alto, on Wednesday, February 8th, 2017, from 6:00 p.m. and 8:00 p.m. The deadline for your response is February 17th. However, an earlier response, if possible, would be appreciated. Please send your response to:

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  
E-mail: [david.rader@pln.sccgov.org](mailto:david.rader@pln.sccgov.org)

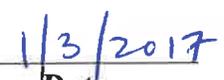
**Prepared by:**  
David Rader, Senior Planner

  
\_\_\_\_\_  
**Signature**

  
\_\_\_\_\_  
**Date**

**Approved by:**  
Manira Sandhir,  
Principal Planner, AICP

  
\_\_\_\_\_  
**Signature**

  
\_\_\_\_\_  
**Date**

## Introduction

The purpose of an Environmental Impact Report (EIR) is to inform decision-makers and the general public of the environmental effects of a proposed project that an agency may implement or approve. The EIR process is intended to provide information sufficient to (a) evaluate a proposed project and its potential for significant impacts on the environment, (b) to examine methods of reducing adverse impacts; and (c) to consider alternatives to the project.

The EIR for the proposed project will be prepared and processed in accordance with the California Environmental Quality Act (CEQA) of 1970, as amended. In accordance with the requirements of CEQA, the EIR for the Stanford University 2018 General Use Permit and related approvals will include the following:

- A summary of the project;
- A project description;
- A description of the existing environmental setting, potential environmental impacts, and mitigation measures;
- A cumulative impact discussion;
- Alternatives to the proposed project; and
- CEQA required environmental consequences, including (a) any significant environmental effects which cannot be avoided if the project is implemented; (b) any significant irreversible and irretrievable commitment of resources; (c) the growth inducing impacts of the proposed project; and (d) effects found not to be significant.

## Project Location

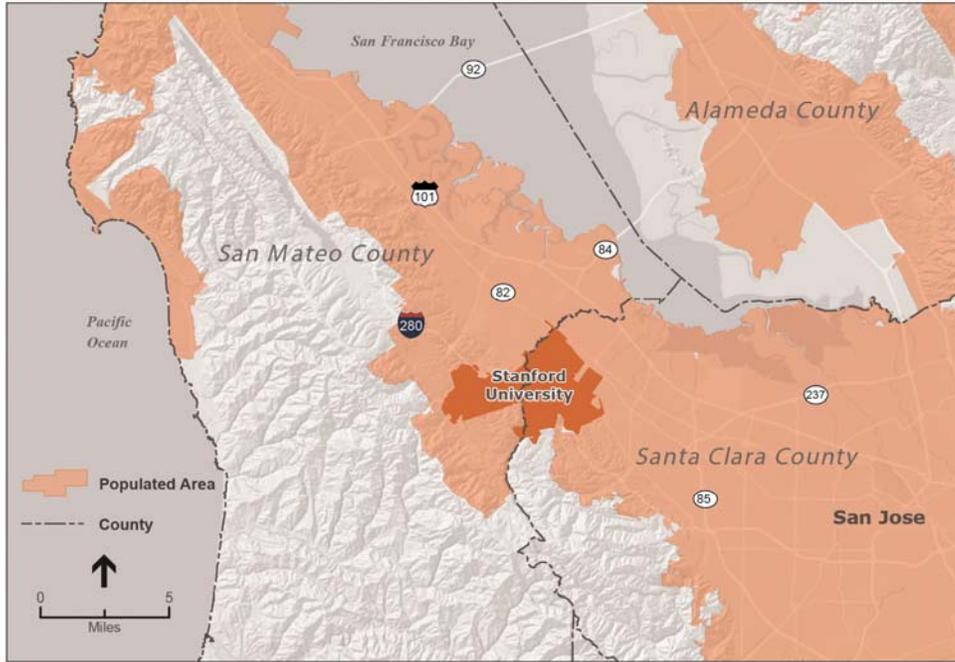
Stanford University (Stanford) is located on the San Francisco Peninsula, approximately 35 miles southeast of San Francisco, and 20 miles northwest of San Jose (see **Figure 1**). Stanford owns approximately 8,180 contiguous acres across six governmental jurisdictions, including unincorporated areas of Santa Clara County and San Mateo County, and the cities of Palo Alto, Menlo Park, Portola Valley and Woodside (see **Figure 2**).

The proposed 2018 General Use Permit would apply only to the 4,017 acres of Stanford lands that are located within unincorporated Santa Clara County, and thus, subject to the land use jurisdiction and regulatory authority of the County of Santa Clara (see **Figure 3**). As shown in Figure 3, the project area is generally located southeast of Sand Hill Road, southwest of El Camino Real, northwest of Stanford Avenue and Page Mill Road, north of Arastradero Road, and east of Alpine Road. Stanford's core campus area, including academic and academic support facilities and housing, is concentrated north of Junipero Serra Boulevard and located within Stanford's Academic Growth Boundary. The largely undeveloped Stanford lands within the foothills south of Junipero Serra Boulevard are located outside of Stanford's Academic Growth Boundary.

## Project Description

### Background

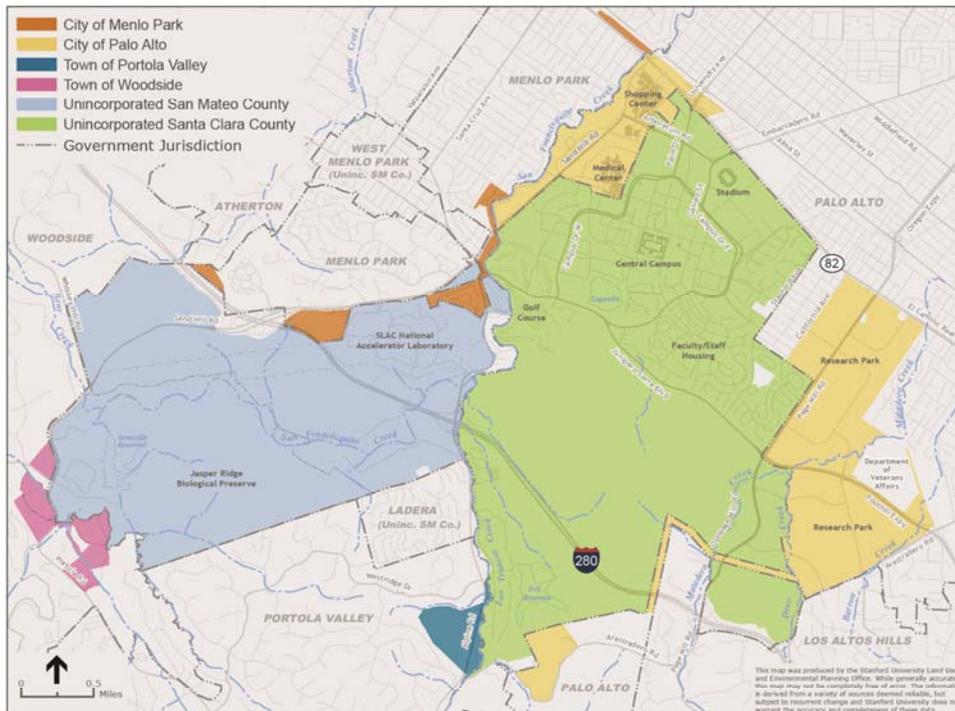
The County of Santa Clara regulates land uses on the Stanford lands within its jurisdiction through several mechanisms, including the General Use Permit adopted in 2000 (hereafter referred to as the 2000 General Use Permit), the Stanford Community Plan (adopted in 2000 as part of the Santa Clara County General Plan), the County Zoning Code, and the 1985 Land Use Policy Agreement between the County of Santa Clara, City of Palo Alto and Stanford University.



SOURCE: Stanford LBRE LUEP, ESA

Stanford 2018 General Use Permit . 160531

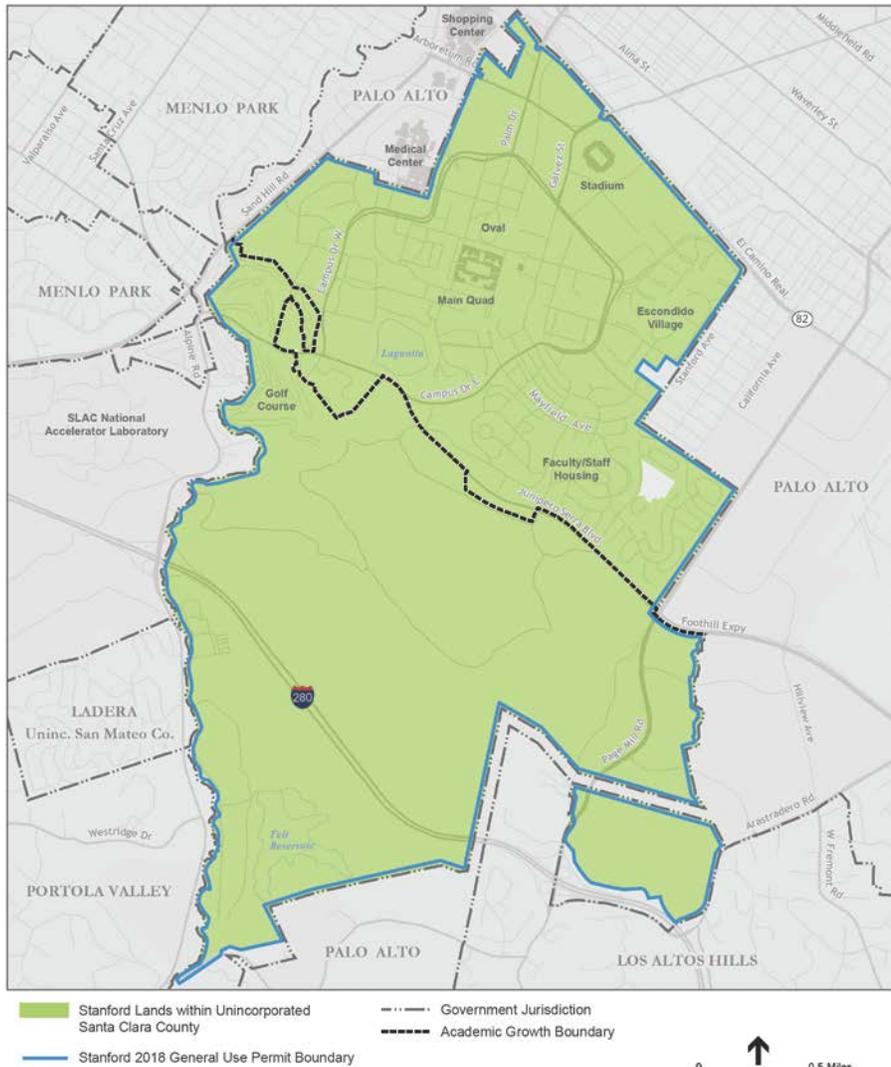
**Figure 1**  
 Regional Map



SOURCE: Stanford LBRE LUEP, ESA

Stanford 2018 General Use Permit . 160531

**Figure 2**  
 Stanford University Lands



SOURCE: Stanford LBRE LUEP, ESA  
 Stanford 2018 General Use Permit . 160531  
**Figure 3**  
 Stanford University Land Subject to  
 Proposed 2018 General Use Permit

The Stanford Community Plan serves as the General Plan for the campus and maps the goals, strategies, and policies for Stanford lands in unincorporated Santa Clara County. It is guided by six core principles:

- compact urban development;
- academic growth boundary for minimum of 25 years;
- conservation of natural resources;
- housing concurrent with academic development;
- flexibility and accountability; and
- goal of no net new commute trips.

The General Use Permit is the implementation document that permits additional academic facilities and housing units, and establishes conditions of approval, consistent with the goals, strategies, and policies of the Community Plan.

The 2000 General Use Permit as amended allowed the construction of 2,035,000 net new square feet<sup>1</sup> of new academic and academic support uses, 3,018 net new housing units/beds for students, faculty and staff, 2,300 net new parking spaces, and associated infrastructure. In May 2016, the County authorized an additional 1,450 housing units to be constructed under the 2000 General Use Permit (for a total of 4,468 housing units/beds authorized under the 2000 General Use Permit). Stanford estimates that approximately 1.4 million net square feet of the academic and academic support uses, and all of the housing, allowed in the 2000 General Use Permit has been built or approved; and that all remaining authorized development under the 2000 General Use Permit will be exhausted between 2018 and 2020.

**Proposed 2018 General Use Permit**

On November 21, 2016, Stanford submitted an application to the County to update its General Use Permit (hereafter referred to as the 2018 General Use Permit). The 2018 General Use Permit application, as well as relevant plans, reports and other documents, are located on the County’s website at:

<https://www.sccgov.org/sites/dpd/Programs/Stanford/Pages/Stanford.aspx>

The proposed 2018 General Use Permit would authorize an increment of campus growth and land use development, anticipated to take place over a period that would extend from approximately 2018 through 2035. The requested amount of growth corresponds to the 2035 Moderate Growth Scenario included in Stanford’s Sustainable Development Study, approved by the County in 2009. **Table 1** presents a summary of existing authorized development and parking at Stanford, and additional development and parking proposed under the 2018 General Use Permit.

**TABLE 1: Summary of Existing Authorized Development and Parking at Stanford University, and Additional Development and Parking Proposed Under the 2018 General Use Permit**

Development	Academic and Academic Support Space (Net Square Feet)	Housing (Units/beds)	Parking
Authorized Prior to 2000 General Use Permit	8,220,000	9,832	19,351
Authorized Under 2000 General Use Permit	2,035,000	4,468 <sup>a</sup>	2,300
Additional Proposed under 2018 General Use Permit	2,275,000	3,150	0 <sup>b</sup>
<b>Total</b>	<b>12,530,000</b>	<b>17,450</b>	<b>21,651</b>
<sup>a</sup> Revised as of May 2016. <sup>b</sup> See, however, proposed 2000-space parking reserve discussed under Proposed Parking, below. Source: Stanford LRBE LUEP, 2016			

**Proposed Development**

Similar to the 2000 General Use Permit, the proposed 2018 General Use Permit would apply to all land uses within unincorporated Santa Clara County that would require a conditional use permit, Architecture and Site Approval (ASA), or Planning Commission approval under the County Zoning Code. The 2018 General Use Permit would not apply to uses on Stanford lands that are permitted by right under the County Zoning Code.

Under the 2018 General Use Permit, Stanford proposes new academic and academic support space, and housing subject to the following development limits:

- 2,275,000 net new square feet of net new academic and academic support facilities; and
- 3,150 net new housing units/beds, of which up to 550 units would be available for faculty, staff, postdoctoral scholars, and medical residents.

<sup>1</sup> Refers to gross square footage pursuant to Government Code Section 65995-65998.

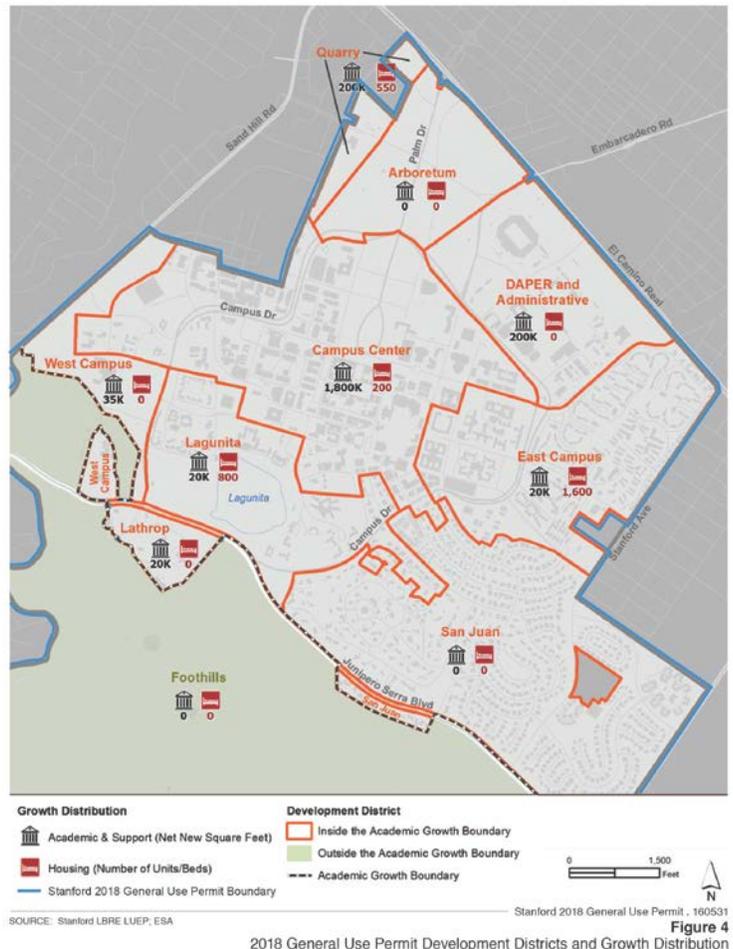
The proposed academic and academic support space and housing units would be constructed on vacant land, infill sites and redevelopment sites within the Academic Growth Boundary (see Figure 3). No site-specific projects and locations have been identified for development under the 2018 General Use Permit. Each individual building or project that would be developed under the 2018 General Use Permit would require submittal of an application to the County at the time proposed, and may be subject to additional review prior to consideration of approval by the County.

Stanford proposes that any remaining unbuilt academic and academic support space square footage that was authorized by the 2000 General Use Permit would be carried over to the 2018 General Use Permit in the event that Stanford does not receive approval for construction of all the remaining square footage by the time the 2018 General Use Permit takes effect.

In the 2000 General Use Permit Stanford identified development districts to estimate the distribution of development within the campus. **Figure 4** presents the proposed distribution of academic and academic support space and housing that is proposed to occur under the 2018 General Use Permit, by development district. Stanford proposes modifications to the district boundaries to better comport to existing zoning boundaries and conditions on the ground. In addition, Stanford proposes minor amendments to Community Plan and zoning designations on some parcels to conform to existing conditions on the ground.

**Housing Linkage**

As with the 2000 General Use Permit, under the proposed 2018 General Use Permit the development of academic and academic support space would be linked to the development of housing units. **Table 2** presents the proposed housing linkage under the 2018 General Use Permit, and proposed interim milestones for development.<sup>2</sup> Interim milestones would be required to be met for each increment of 500,000 square feet of academic and academic support space to ensure proposed housing keeps pace with academic and academic support facility growth. Similar to the 2000 General Use Permit Condition F.7, under the 2018 General Use Permit, Stanford seeks a condition that would allow it to build additional housing beyond the proposed development limit of 3,150 housing units/beds, subject to additional environmental review and approval by the Planning Commission.



<sup>2</sup> As shown in Table 2, under the proposed project, Stanford would use the same housing linkage ratio as was identified in Condition F.8 in the 2000 General Use Permit.

**TABLE 2: 2018 General Use Permit Housing Linkage**

Academic and Academic Support Space (Net New Square Feet)	Housing Units/Beds at 1/826 (Net New Square Feet)	Cumulative # of Housing Units/Beds
0 – 0.5 M	605	605
0.5 – 1.0 M	605	1,210
1.0 – 1.5 M	605	1,815
1.5 – 2.0 M	605	2,240
2.0 - 2.275 M	333	2,753
Note: This table represents the minimum housing required per the housing linkage ratio. However, the 2018 General Use Permit proposes a greater number of housing units/beds (3,150) than that required by the housing linkage ratio. Source: Stanford LRBE LUEP, 2016		

Stanford has proposed that certain specific types of development not be counted towards the proposed development limits. This exempted development would include 40,000 net new square feet of child care and community center space. Stanford also proposes to continue to be allowed to utilize up to 50,000 net new square feet of construction surge space that was authorized in the 2000 General Use Permit. Surge space is used to temporarily house uses that may be displaced during a construction project.

As proposed, the 2018 General Use Permit would also accommodate construction of campus infrastructure improvements to support development proposed under the 2018 General Use Permit, including, but not limited to, utilities and circulation improvements.

***Proposed Parking***

Under the 2018 General Use Permit the authorized amount of parking would be unchanged from the limits established by the 2000 General Use Permit. Stanford proposes to exempt certain types of parking at the campus from inclusion in its authorized parking limit, including parking associated with trip-reduction programs, electric vehicles, police and fire department use, and high-density faculty and staff housing. In addition, Stanford University proposes that the 2018 General Use Permit include an option to allow Stanford to construct a 2,000-space parking supply reserve, subject to Planning Commission review and approval, if any one of the following conditions apply: 1) Stanford is achieving its No Net New Commute Trip goal; 2) such parking would not result in a substantial increase in peak-hour commute trips; or 3) unforeseen circumstances occur due to changes in background conditions would require provision of additional parking.

**County Approvals**

Stanford seeks the following approvals from the County:

- Certification of the 2018 General Use Permit EIR;
- Adoption of a new 2018 General Use Permit;
- Approval of amendments to the County Zoning Map (zoning designation changes are proposed for specific parcels within the campus); and
- Approval of amendments to the Stanford Community Plan.

**Potential Environmental Effects of the Project**

The County will prepare a program level EIR for the proposed 2018 General Use Permit pursuant to CEQA Guidelines Section 15168. It should be noted that project-specific CEQA review may be required for individual buildings or other projects that would be developed pursuant to the proposed 2018 General Use Permit. Prior to consideration of approval, the County would examine each individual development at

the time they are proposed to determine whether the environmental effects of the specific project were disclosed in the 2018 General Use Permit EIR.

The EIR will identify the significant environmental effects anticipated to result from implementation of the proposed 2018 General Use Permit. Specific environmental topics addressed will include:

- **Aesthetics** – The EIR will describe the existing visual and aesthetic conditions of the project site and the study area, and will evaluate the effect of the proposed changes envisioned by the proposed project on scenic views, visual character and quality, and light and glare. Mitigation measures will be identified to reduce any potential significant aesthetic impacts will be identified and analyzed, as appropriate.
- **Air Quality.** The air quality analysis presented in the EIR will discuss current air quality conditions and air-pollutant sensitive land uses or activities in the vicinity of the project area; describe the regulatory context for air pollution in the Bay Area; and assess the potential for the project to conflict with the Clean Air Plan, violate any air quality standards, result in cumulatively considerable increase in criteria pollutants, cause emissions of substantial pollutant concentrations, or create objectionable odors. Stanford University has submitted an Air Quality Technical Report for the proposed project, which will be peer-reviewed and, if appropriate, included in the Air Quality section. As needed, mitigation measures to reduce any potential significant air quality impacts will be identified and analyzed.
- **Biological Resources** – The EIR will present information on applicable biological resources in the project area, including special-status wildlife and plant species, natural communities, and wetlands; describe the regulatory framework for biological resources; and evaluate potential for implementation of the proposed project to impact biological resources and/or conflict with Stanford’s Habitat Conservation Plan. As needed, mitigation measures to reduce any potentially significant biological resource impacts will be identified and analyzed.
- **Cultural Resources** –The EIR will present relevant cultural resources information, including data from Stanford’s Archaeological Resources Map and other sources; and will assess the potential for the proposed project to cause a substantial adverse change in the significance of historical resources, archaeological and unique paleontological resources, tribal cultural resources, or potential disturbance of human remains. In addition, Stanford University has submitted an Historic Resources Survey for the proposed project, which will be peer-reviewed and, if appropriate, included in the Cultural Resources section. As needed, mitigation measures to reduce any potentially significant impacts to historic and archaeological resources will be identified and analyzed.
- **Energy Conservation** –Consistent with CEQA Guidelines Appendix F, the EIR will evaluate the potential energy impacts of operation, construction, and transportation associated with the proposed 2018 General Use Permit. Stanford has submitted an Energy Technical Analysis for the proposed project, which will be peer-reviewed and, if appropriate, included in the Energy Conservation section. If needed, mitigation measures that would avoid or reduce the wasteful, inefficient, and unnecessary consumption of energy will be identified and analyzed.
- **Geology and Soils** – The EIR will present relevant information on existing soils and geologic conditions at Stanford. The EIR will address the potential for implementation of the proposed 2018 General Use Permit to result in soil erosion or exacerbate conditions related to unstable soils or slopes. If needed, mitigation measures to reduce any potential significant impacts related to geology and soils will be analyzed and described.
- **Greenhouse Gas Emissions** – The EIR will report greenhouse gas (GHG) emissions associated with implementation of the proposed 2018 General Use Permit, and will assess any conflict with applicable policies or regulations adopted for the purpose of reducing emissions of GHGs. As needed, relevant

policies and features that may serve to minimize GHG emissions will be identified. Stanford University has submitted a GHG Emissions Technical Report for the proposed 2018 General Use Permit, which will be peer-reviewed and, if appropriate, included in the GHG Emissions section of the EIR. If needed, mitigation measures to reduce any potential significant impacts related to GHG emissions will be identified and analyzed.

- **Hazards and Hazardous Materials** – The EIR will discuss existing conditions as it relates to the potential past releases of hazardous materials within the General Use Permit area, describe existing hazardous materials and waste use, storage, and disposal operations at the campus, and discuss the regulatory requirements governing these operations. The EIR will assess whether implementation of the proposed project would have the potential to emit hazardous emissions, exacerbate hazard conditions through ground disturbance, or interfere with emergency evacuation plans. If needed, mitigation measures to reduce any potential significant impacts related to hazards and hazardous materials will be identified and analyzed.
- **Hydrology and Water Quality** – The EIR will generally describe the hydrology and water quality conditions in and around the General Use Permit area, and describe the applicable regulatory agencies and regulations governing water resources at the campus. The EIR will address the potential for implementation of the proposed project to substantially degrade water quality or violate water quality standards, deplete groundwater supplies or substantially interfere with groundwater recharge, substantially increase surface runoff or erosion, or exacerbate flooding hazards from new development. Stanford has prepared a draft Water Supply Assessment for the proposed 2018 General Use Permit, which will be peer-reviewed and, if appropriate, included in the Hydrology and Water Quality section of the EIR. If needed, mitigation measures to reduce any potential significant impacts related to hydrology and water quality will be identified and analyzed.
- **Land Use** – The EIR will describe existing land uses and development trends within the project area; discuss potential inconsistencies of the proposed 2018 General Use Permit with relevant County and other applicable planning documents; analyze potential programmatic land use changes that could occur, and evaluate the compatibility with neighboring land uses. If needed, mitigation measures to reduce any potential significant impacts related to land use will be identified and analyzed.
- **Noise and Vibration.** The EIR will describe the existing ambient noise environment in and around the General Use Permit area; identify applicable noise guidelines and regulations; assess the noise compatibility of the proposed project with existing land uses, and assess construction and operational noise and vibration impacts on existing and proposed future land uses. If needed, mitigation measures to reduce any potential significant impacts related to noise and vibration will be identified and analyzed.
- **Population and Housing** – The EIR will describe the magnitude of potential changes in population and housing associated with the proposed 2018 General Use Permit. The EIR will describe whether the housing demand associated with increased campus population under the proposed project would be met by the existing or future housing supply. The EIR will evaluate if implementation of the proposed project would displace housing and population, from both the Stanford campus and, indirectly, from nearby areas. If needed, mitigation measures to reduce any potential significant impacts related to population and housing will be identified and analyzed.
- **Public Services** – The EIR will describe local police and fire services, as well as primary and secondary schools in districts serving the General Use Permit area and surrounding communities; and assess whether implementation of the proposed 2018 General Use Permit would require the construction of new or expanded public facilities that would result in substantial adverse physical impacts. If needed,

mitigation measures to reduce any potential significant impacts related to public services will be described.

- **Recreation** –The EIR will describe the environmental setting for parks and recreation; discuss the potential for the anticipated population increases and proposed 2018 General Use Permit development to result in a corresponding increases in the use of non-Stanford recreational facilities such that substantial impacts could occur; and assess whether the construction of any proposed recreational facilities would have a significant effect on the environment. Stanford University has submitted a Parks and Recreation Facilities Analysis for the proposed project, which will be peer reviewed and, if appropriate, included in the EIR Recreation section. If needed, mitigation measures to reduce any potential significant impacts related to recreation will be identified and analyzed.
- **Transportation & Circulation** –The EIR will describe existing multi-modal transportation and circulation conditions at study intersections, on freeways, and transit facilities, as well as transit service and bicycle/pedestrian facilities; describe Stanford’s current and proposed transportation demand management programs; present forecasted future conditions using the VTA/CCAG travel demand model; estimate trip generation, trip distribution and vehicle miles traveled associated with the 2018 General Use Permit; and analyze near-term and cumulative transportation conditions with and without the proposed 2018 General Use Permit. Stanford University is submitting a Traffic Impact Study for the proposed 2018 General Use Permit, which will be peer reviewed and, if appropriate, included in the EIR Transportation & Circulation section of the EIR. If needed, mitigation measures to reduce any potential significant impacts related to transportation and circulation will be identified and analyzed.
- **Utilities and Services Systems** –The EIR will describe existing utilities and service systems, including water, wastewater and solid waste services that serve Stanford, calculate increased demand for water and generation of wastewater and solid waste under the proposed 2018 General Use Permit; and assess whether implementation the proposed project would require new or expanded public utilities, the construction or operation of which would have a substantial adverse impact on the environment. The EIR will also consider whether the proposed project would comply with applicable regulations related to solid waste. The evaluation of water demand will be based on a draft Water Supply Assessment prepared by Stanford for the proposed 2018 General Use Permit, and peer reviewed and ultimately approved by the County. The EIR will evaluate if there are sufficient water supplies available to serve the project from existing entitlements and resources. If needed, mitigation measures to reduce any potential significant impacts related to utilities and service systems will be identified and analyzed.
- **Cumulative Impacts.** The EIR will evaluate, issue by issue, the potential for the proposed project, when combined with other development identified in the cumulative setting, to either result in new, or contribute to existing, cumulatively considerable adverse effects on the environment.
- **Alternatives.** CEQA requires that an EIR describe a range of reasonable alternatives to a project (or project location) that feasibly attain most of the objectives, but could avoid or reduce at least one environmental impact (see CEQA Guidelines Section 15126.6).
- **Growth Inducement.** This section will qualitatively evaluate the project’s potential to induce growth and any subsequent environmental impacts that would occur (pursuant to CEQA Guidelines Section 15126[d]).

**Brettle, Jessica**

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**From:** Fred Balin <fbalin@gmail.com>  
**Sent:** Tuesday, February 14, 2017 2:32 PM  
**To:** David Rader; Manira Sandhir  
**Cc:** Council, City; Gitelman, Hillary; Lait, Jonathan; Keene, James; Drekmeier, Peter  
**Subject:** Request to Extend Public's GUP 2018 Scoping Deadline

Country Planners Rader and Sandhir,

This a request that the deadline of February 17 for public responses (i.e., comments) to the Notice of Preparation for an EIR for the Stanford University "2018 General Use Permit" be extended to a date commensurate to that afforded the Palo Alto City Council.

The reasons are as follows:

1. The scoping session of 2/8/17 conflicted with Palo Alto's annual State of the City Address and therefore limited attendance.
2. New information (i.e., "clarifications" from the county supervisor of District 5) made at the scoping session, require additional research as to their location in various documents as well as consideration as to their relevance in potential scoping comments
3. The Palo Alto City Council will not meet for a study session on the GUP 2018 application until after the deadline.
4. Unless release is much earlier than expected, a draft comment letter from Palo Alto city staff will not be available prior to this Friday's deadline.
5. Palo Alto residents should have the opportunity to hear their council members' discussion prior to the deadline
6. It seems only fair that all parties have the same deadline for comment submission.

Thank you,

Fred Balin  
2385 Columbia Street  
Palo Alto, CA 94306

**Brettle, Jessica**

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**From:** Fred Balin <fbalin@gmail.com>  
**Sent:** Friday, February 17, 2017 4:17 PM  
**To:** PAN  
**Subject:** GUP 2018 Scoping Comments

Thank you for the follow-up input I have received.

Below is what I will submit in a few minutes via email to the county's manager of the CEQA process, David Rader, [david.rader@pln.sccgov.org](mailto:david.rader@pln.sccgov.org)

There's a whole lot more (that was sent to me and beyond) than can be communicated to better define the "scope" of the EIR, so if you can do it today (the deadline day for public comment), please do.

FYI. The city council was allotted an extension; is now rescheduled to meet for a study session on this item on Feb 27, and consider draft comments of their submission to the county on March 6.

-Fred Balin

GUP 2018 EIR Scoping Input

1a. What is the additional number of people that Stanford plans to have as students and hires as per the GUP 2018 proposal?

What will be the cumulative totals, including those from the GUP 2018 proposal?

1b. Break down all totals above into categories of undergraduates, graduate students, post-doctorates, faculty, staff working usual business hours, and staff working other than usual business hours?

1c. How many people will be housed on campus (both in GUP 2018 and cumulative)?

1d. How many people housed on campus will be children, for the purpose of better determining impacts on neighboring public facilities

2a. What will be the mix of housing (both in GUP 2018 and cumulative) for each category in #1

2b. Define the terms "beds" and "units" and how they used?

3a. Provide the current overall jobs to housing ratio on campus, in each employment category in #1

3b. What will be the jobs to housing ratio on campus for each employment category in #1 for the GUP 2018 growth additions and the cumulative totals?

4a. Examine the results of the GUP 2000 EIR and carefully determine the accuracy of projections made at the time and whether mitigations specified in GUP 2000 adequately addressed those impacts. If not, explain how and determine why?

4b. In detail, review GUP 2000 Condition Section I. 2, which begins:

*"Stanford shall dedicate easements for, develop, and maintain the portions of the two trail alignments which cross Stanford lands ... "*

Determine if the end result fulfilled the intent and spirit of this condition. Explain clearly why or why not. Describe what additional protections should be included in GUP 2018 to prevent a repeat of the problems of interpretation of this section of GUP 2000

5. The major check on potential development in the Foothills District will expire midway through GUP 2018. Growth projections in Stanford's 2000 Community Plan indicate that both the constraint of 17,300,000 sf of building area of academic and support facilities and student housing as well as its co-condition in the community plan (Page 16, Policy SCP-GD2) to retain the current academic growth boundary, will expire in 2025.

It is essential that the GUP 2018 EIR determine a "maximum build out" or "maximum carrying capacity" for the Stanford academic campus so the public, governmental agencies, and the university can adequately address the community's desire for uninterrupted and permanent or very long term protections for the Foothills District.

6a. Obtain a current, accurate, baseline of traffic in areas around the campus using actual counts

6b. Extend the areas of the baseline beyond the typical Level of Service intersections to key entry points in surrounding neighborhoods.

6c. Extend the baseline traffic analysis to cover non-peak hours.

6d. Obtain expert, independent, third party review of (a) the traffic and transportation analysis work plan, and (b) the final projections and conclusions made in the draft report/analysis.

6e Fully determine any additional impacts in off-campus traffic and transportation against various growth scenarios.

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**Brettle, Jessica**

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**From:** tom@tomvlasic.com  
**Sent:** Friday, February 17, 2017 2:34 PM  
**To:** Council, City  
**Cc:** Gitelman, Hillary; Meg; Shepherd, Nancy; McFall, Jim; Keith (via; Christine Shambora  
**Subject:** Stanford GUP NOP Comments  
**Attachments:** Stanford GUP-Southgate-Rader-SCC.pdf

Dear Council Members,

Attached is a letter the Southgate Neighborhood Committee has transmitted to Santa Clara County Planning relative to the NOP on the proposed 2018 Stanford GUP application and EIR process. We wanted you to have a copy for the record.

Best regards,  
Tom Vlasic  
for the Southgate Neighborhood Committee

**Southgate Neighborhood Committee**

**Palo Alto, California**

c/o Tom Vlastic  
1540 Mariposa Avenue  
Palo Alto, California 94306

February 16, 2017

**Transmitted by email: david.rader@pln.sccgov.org**

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

Subject: Comments on NOP for Proposed Stanford University 2018 GUP

Dear Mr. Rader,

Thank you for the opportunity to comment on the subject NOP. Our committee members and our neighbors live in the Southgate Neighborhood of Palo Alto. This neighborhood is bounded by El Camino Real, Churchill Avenue, Alma Street and Park Avenue. Southgate is Stanford's immediate neighbor northeast of the University and just across El Camino Real from the DAPER/Administrative and East Campus districts of the Stanford plan area. Of the plans proposed 2,275,000 sf of new academic space and 3,150 new dwelling units (dus), 220,000 sf of the academic space and 1,600 of the dus are planned in the two districts adjacent to our neighborhood.

Southgate has been, and continues to be, impacted by traffic and parking from non-residential uses outside of, and immediately adjacent to, our part of the City of Palo Alto and this is what concerns us about the proposed 2018 GUP. We have been struggling to cope with and address the parking problems from non-residential uses and have been working with the City in this regard. Traffic on the Churchill corridor between Alma and El Camino Real is compounding each year, therefore the anticipated growth of Stanford University as set forth in the proposed 2018 GUP plan causes additional alarm within our neighborhood. We are particularly concerned with the lack of a truly verifiable plan for monitoring and dealing with off campus traffic and parking impacts, particularly when we consider the manner in which the Transportation Demand Management (TDM) plan proposals are set forth in the Stanford application. We find them inadequate and to rely on only committing to partially solving problems well after the impacts are felt by the adjacent neighborhoods.

Under section 7.1 No Net Commute Trips Goal in the plan application, we specifically request that the draft EIR fully evaluate the practical application of the proposed TDM programs, and particularly their ability to be realistically monitored and implemented to reduce potential impacts of traffic and parking to insignificant levels. There should be detailed implementation strategies for the TDM operations that, under direct Santa Clara County Planning oversight and control, require Stanford to fully address evolving off site traffic and parking problems well BEFORE they mature to significant impact levels. Specifically, these strategies should ensure verification that TDM mitigations are functioning as intended and that, for example, the TDM stipends, VTA,

Caltrain, SamTrans, carpool gas cards and other passes or subsidies issued to workers/commuters, are being used and, most importantly, achieving the intended results.

Today, modern TDM programs can incorporate technology that correlates directly to a commuter, and their public transportation activity to verify that trips into Palo Alto are based on public transit, not driving and parking adjacent to a Marguerite shuttle route in a local neighborhood. What we are suggesting will likely require a hands-on TDM management program that issues subsidies directly to Clipper Cards, gas reimbursement applications, and other trip reduction techniques that can verify transit use and commute activity.

Our concerns are underscored by comments we have heard recently from Stanford representatives about the potential for off site parking, traffic and other impacts as “not Stanford’s problem” since this is a typical issue between universities and adjacent neighborhoods. Instead, they argue that such problems should be addressed by the City of Palo Alto. Southgate objects to this conclusion, and believes that Stanford does and will contribute to increased traffic congestion in and around our neighborhood, the city and other communities and therefore should be responsible for this impact with mitigations that include clear and specific verification methods that ensure workers offered TDM programs are using public transit for the entire commute.

As a reminder, Stanford is not a public university and does not have the same relief from the discretionary review process that a California public university would. Stanford should be held accountable for its share of off site impacts as would any other private use seeking such a permit. At the same time, we recognize the many benefits that a private school like Stanford offers, and the efforts it has made relative to TDMs. Our request is that Stanford update their TDM techniques so that there is verifiable accountability so that neighbors like Southgate can be confident these programs will achieve trip reduction mitigations to fully offset potential growth impacts relative to the proposals set forth in the requested GUP application.

Again, we thank you for the opportunity to comment on the NOP and look forward to a full and complete draft EIR addressing not only our concerns, but the many other growth impact issues the 2018 GUP proposals will trigger.

Sincerely,

**Southgate Neighborhood Committee:**

Nancy Shepherd  
Jim McFall  
Christine Shambora  
Keith Ferrell  
Tom Vlasic



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Signed by Tom Vlasic on behalf of the Southgate Neighborhood Committee

cc. Palo Alto City Council