



City of Palo Alto

City Council Staff Report

(ID # 9543)

Report Type: Action Items

Meeting Date: 8/20/2018

Summary Title: Stanford General Use Plan

Title: Review and Comment on the Letter Sent to the Santa Clara County Board of Supervisors Regarding the Stanford General Use Plan (GUP)

From: City Manager

Lead Department: City Manager

Recommendation

Discuss and potentially forward additional Council comments to Santa Clara County regarding the Stanford University 2018 GUP Recirculated Draft Environmental Impact Report (RDEIR).

Background

Attached is the letter City Staff sent to the County on July 26 with our comments on the RDEIR. Staff drafted this letter based upon comments and discussion at the Council's June 25, 2018 meeting. Staff submitted the City's comment letter during the Council's summer recess, in advance of the deadline established by the County.

While that deadline has passed, City Council Members asked that tonight's session be scheduled for Council to discuss and provide additional comments on the 2018 GUP and RDEIR.

To assist with that discussion, attached are the City's Letter and PAUSD's letter to the County.

Attachments:

- Attachment A: Stanford Letter



PLANNING & COMMUNITY ENVIRONMENT

CITY OF PALO ALTO 250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
650.329.2441

July 24, 2018

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

Dear Mr. Rader,

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

The City of Palo Alto supports Stanford University’s (University) academic interests and recognizes and appreciates the positive contributions, direct and indirect, that the region, and specifically, Palo Alto, receives from the University’s location. And, we believe that Palo Alto’s reputation for its excellent residential neighborhoods, pedestrian-oriented commercial districts, spirit of innovation, community parks and schools, likewise enhance the University’s appeal when recruiting Stanford Affiliates¹.

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

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

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

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

¹ Includes students, faculty, staff, and other workers



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

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

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

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

Housing Alternatives: Traffic and Air Quality

The City appreciates the County's incorporation of the Housing Alternatives (Alternatives). The comments in this section relate primarily to Alternative A. The Alternative includes 2,342 additional on-campus housing units, but otherwise retains all other components of the Project. Operational emissions from the new housing units results in three new significant and unavoidable impacts related to air quality (PM₁₀). Ninety-four percent of these emissions are attributed to mobile sources.

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

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

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

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

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

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

Housing Alternatives: Aesthetics

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

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

Housing Alternatives: Project Objectives

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

Housing Alternatives: Public Services

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

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

PAUSD Impacts

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

Previous Comments on DEIR

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

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

Sincerely,



Jonathan Lait, AICP
Interim Director

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

goldfarb
lipman
attorneys

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

M David Kroot
Lynn Hutchins
Karen M. Tiedemann
Thomas H. Webber
Dianne Jackson McLean
Michelle D. Brewer
Jennifer K. Bell
Robert C. Mills
Isabel L. Brown
James T. Diamond, Jr.
Margaret F. Jung
Heather J. Gould
William F. DiCamillo
Amy DeVaudreuil
Barbara E. Kautz
Erica Williams Orcharton
Luis A. Rodriguez
Rafael Yaquián
Celia W. Lee
Dolores Bastian Dalton
Joshua J. Mason
Eric S. Phillips
Elizabeth R. Klueck
Jeffrey A. Streiffer
Daniel S. Maroon
Justin D. Bigelow
Nahal Hamidi Adler
Aileen T. Nguyen

July 23, 2018

via electronic mail

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

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

Dear Mr. Rader:

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

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

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

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

San Francisco
415 788-6336
Los Angeles
213 627-6336
San Diego
619 239-6336
Goldfarb & Lipman LLP

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for your consideration.

Very truly yours,



KAREN M. TIEDEMANN

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