

July 24, 2018

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

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

Dear Mr. Rader:

San Mateo County has reviewed the above referenced document, which introduces two additional project alternatives to the project that has been proposed by Stanford University (Stanford). These alternatives increase, to varying degrees, the amount of housing to be provided on campus, and also provides Stanford with the option to provide these residential units off-site. The recirculated Draft Environmental Impact Report (DEIR) does not state how or why the County selected and pursued further consideration of these two additional project alternatives. If the objective is to identify options that minimize the project's significant impacts on transportation and housing, San Mateo County believes that this objective would be better achieved by pursuing a phased, incremental approach to campus development, as suggested in our January 26, 2018 comments to the original DEIR.

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

I. Housing Impacts

San Mateo County is glad to see that the recirculated portions of the DEIR recognize the significance of the project's housing impacts. However, we disagree with the recirculated DEIR's characterization of these impacts solely as physical impacts associated with off-campus housing (Impact 5.17). The project's impact on housing, which remains unrecognized by the environmental reviews conducted to



date, includes the fact that the increased demand for housing caused by the expanded Stanford student, faculty, and affiliate population will severely reduce the already inadequate supply of housing that is affordable to low and moderate income families and individuals.

Allowing Stanford to elect to provide the number of housing units required by the new alternatives at any off-site location, and to locate affordable off-site housing “within one half mile of any major transit stop or a high quality transit corridor¹ in the Bay Area” (p.2-7 of the Recirculated DEIR) significantly diminishes the ability of this measure to effectively mitigate the impact of the project on housing in San Mateo County. We are similarly concerned that the six-mile radius in which affordable housing would be constructed, as described on pages 2-254 for Alternative A and on page 2-259 for Alternative B, does not provide assurance that the housing impacts experienced within San Mateo County will be adequately mitigated. As detailed in our comments on the DEIR, it is essential that Santa Clara County recognize the direct and significant impacts that Stanford’s growth has on San Mateo County, particularly on San Mateo County’s housing supply. The assumption that these impacts can be reduced in any meaningful way by constructing housing anywhere within the Bay Area, or within a six-mile radius, under an ill-defined methodology that provides little to no involvement by San Mateo County, is both incorrect and contrary to the need for the project to mitigate its impacts on San Mateo County.

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

II. Transportation Impacts

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

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

¹ Please define “major transit stop” and “high quality transit corridor.”

transportation impacts within San Mateo County will be worse if the needed units are constructed on campus, as opposed to elsewhere within the region.

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

With regard to the intersection at Alpine and I-280, the recirculated DEIR assumes an improvement to operations due to reduction of commuter traffic. While the new alternatives may reduce the use of this intersection by students and employees/students of Stanford, it will likely face increased use by family members and others residing in these proposed alternative housings that commute to and from elsewhere in County, rendering the trip distribution, as proposed, unreasonable. San Mateo County requests additional analysis of this interchange based on more realistic assumptions to fully evaluate any impact the proposed project and the new alternatives may have, and to develop and implement the necessary mitigation measures.

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

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

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

Like the proposed project, the alternatives studied by the recirculated DEIR will have significant and unavoidable impacts on transportation. The questions and issues we raised regarding these impacts in our comments on the DEIR are applicable to the alternatives contained in the recirculated DEIR and are incorporated within this letter by reference. For example, San Mateo County reiterates its request to be involved and to have a representative in any oversight committee established by Santa Clara County to

monitor the mitigation and fund distribution for this project. It is unfortunate that no effort was made to respond to or clarify these comments within the recirculated DEIR.

Finally, we note our concern about the significant and unavoidable transportation impacts that will be incurred by allowing Stanford to construct non-affordable units under the new alternatives anywhere within the Bay Area. These impacts underscore the importance of evaluating project alternatives that do not provide Stanford the unqualified option to provide housing off-campus, and that provide greater detail regarding the method for mitigating the transportation impacts of whatever alternative is selected, as described by our comments on the DEIR.

Thank you for your consideration of these comments. San Mateo County looks forward to continuing to engage in this process and will evaluate all available options to ensure that the substantial impacts of the proposed project on the County will be properly addressed and mitigated. If you have any questions regarding the content of this letter, please contact the San Mateo County Community Development Director, Steve Monowitz, at smonowitz@smcgov.org or (650) 363-1861.

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

Dave Pine

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