

January 26, 2018

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

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

Dear Mr. Rader:

San Mateo County appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Stanford University's 2018 General Use Permit Application (GUP), and your agreement to the extend the time in which San Mateo County may submit its comments. We also extend our thanks to the Director of Santa Clara Planning and Development Department for Santa Clara County staff's attendance at hearings of the San Mateo County Planning Commission and Board of Supervisors regarding this environmental review.

In addition to the hearings attended by Mr. Girard, San Mateo County conducted a community meeting on November 29, 2017, at which representatives of Stanford University were in attendance. This comment letter describes and summarizes the issues and concerns that were raised at these meetings, as well as additional matters that have been identified by County staff.

1. Regional Impacts and Proposed Mitigation

The DEIR states that the GUP project, which has been described by some as the largest development project ever proposed within Santa Clara County, will result in significant unavoidable impacts on transportation, historic resources, and noise. San Mateo County notes that the DEIR does not -- but, in our view, should -- identify impacts on housing as a potentially significant impact of the project, for the reasons described in Section 4 of this letter.

Many of the project's significant impacts, particularly on transportation and housing, will be experienced within San Mateo County. As detailed below, the 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. Moreover, descriptions of methods for mitigating these impacts are either absent from the DEIR or insufficiently detailed. For example, there is no description of how the housing fund intended to offset housing impacts will be distributed, nor any explanation of how roadway and intersection improvements will be carried out in terms of timing and selection.

In order to address these deficiencies, San Mateo County requests more detailed analyses of community specific impacts that study, among other things, the following:

- current “cut-through” traffic patterns;
- the percent of Stanford students, faculty, and employees who currently work or reside in specific communities of unincorporated San Mateo County;
- alternative methods for reducing “cut through” traffic and other project-related traffic circulation impacts by exploring on-campus roadway improvements that provide direct access to and from Highway 280; and
- the feasibility of providing expanded transit services to the communities where Stanford students, faculty, employees, and affiliates reside.

San Mateo County also requests a detailed description of the method by which the housing fund proposed in the DEIR will be distributed. In this regard, the County recommends direct contributions to impacted jurisdictions in an amount that is proportional to the anticipated housing-related impact. To this end, we submit that \$20 per square foot of new campus facilities is too low an amount to effectively mitigate the significant demand for off campus housing units that the project will generate. Many local jurisdictions within the region have recently prepared nexus studies to determine appropriate housing impact fees for development projects. A similar level of analysis should be performed to determine the amount that must be contributed by Stanford.

Further, we request a detailed description of how specific intersection, roadway, and transit improvements will be selected for implementation, and the process that will be used to coordinate the construction of these improvements with local jurisdictions and transportation agencies. The limited information provided by the DEIR in this regard places these decisions entirely within the jurisdiction of the Santa Clara County Planning Office, and limits Stanford’s responsibilities to paying a fair share contribution. San Mateo County believes that a much more coordinated, transparent, and reliable method for implementing these mitigation measures must be provided before they can be assumed to be effective.

2. Transportation and Circulation

The DEIR identifies that the proposed development will result in significant adverse and unavoidable circulation impacts if Stanford is unable to achieve its goal of no new peak hour trips. However, the DEIR does not adequately establish that adverse traffic impacts will be avoided if Stanford is able to achieve the goal of no new peak hour trips, as traffic problems are certainly not limited to the single busiest hour of the day.

Even if Stanford can establish its ability to achieve this goal, which seems challenging under the current monitoring system that is both limited in duration and prone to human error, the trips generated outside of the peak hour also have the potential to cause significant adverse impacts that would go unmitigated under the proposed approach. Therefore, consideration should be given to installing modern license reading technologies that would provide much more robust and accurate data, during longer periods of the day. Another inadequacy of the proposed “no new peak hour” trip standard is that

many types of trips (such as trips to Stanford Hospital) are not counted under that standard, which precludes an effective assessment of actual circulation impacts.

With regard to the circulation impacts on communities within San Mateo County that are identified by the DEIR, we have particular concerns about the intersections listed in the following table:

Node #	Intersection	Existing LOS AM/PM Table 5.15-2	With Project 2018 LOS AM/PM Table 5.15-19	With Project 2035 LOS AM/PM Table 5.15-29
#2	Sand Hill Rd and I-280	D/B	F/C+	F/B-
#24	Alpine Rd and I-280	D/C	D/D	D/D
#59	Middlefield and Marsh Rd	C/D	C/D-	E-/E

Intersection #24 is an existing 3 way stop controlled intersection. In contrast to the data presented by the DEIR, San Mateo County's analysis of this intersection shows LOS C/F/E for 7:30-8:30 AM/3-4PM/ 5-6 PM respectively. San Mateo County requests that Santa Clara County provide additional analyses to resolve this discrepancy. In addition, the DEIR proposes no mitigation for the anticipated impacts to this intersection, notwithstanding current County of San Mateo Traffic Impact Requirements, which mandate that all impacts be mitigated. San Mateo County therefore further requests that Santa Clara County address how the project will comply with these requirement, and reference them in Section 5.15-5.55 regarding Local Regulations

At intersection #59, within the City of Atherton, there are no mitigation or cost sharing requirements for intersection improvements. Impacts at this intersection will affect unincorporated San Mateo County communities in North Fair Oaks and Menlo Oaks. More details are needed to understand how project impacts to this intersection will be mitigated.

With further regard to our concerns regarding the ability to effectively document compliance with no new peak hour trip threshold, we note that Figure 5.15-6 of DEIR, which is used for both 2018 and 2035 transportation models, assumes that the off campus vehicle trips are only generated by Stanford's off-campus commuters. It does not include trips by on-campus residents to off campus areas. The trip generation was developed using a survey of existing student, faculty, and employees. However, due to the cost of available housing in this area, the distribution of future trips may vary significantly. A summary of the vehicle trips generated by percentage is listed below along with existing transit and bicycle facilities in these corridors:

Location	Percent Auto Trips	Transit Service available	Bike Route Available	In Cordon Credit Area?
Alpine Road	1.5%	Sam Trans	Class II and Class III	Y

Alameda de las Pulgas	4.5%	Sam Trans	Class II and Class III	Y
Marsh Road	2%	Sam Trans	None	Y

The above table represents the percent of new vehicle trips to and from Stanford University's main campus, but it does not include any percentages for future trips to Stanford Hospital or other Stanford affiliates. The forecasted trip generation in 2035 assumes the same trip distribution as the current Stanford Campus population. This should be reviewed against the data provided by AECOM for the County of Santa Clara in the Traffic Monitoring Report for 2014, which identified that approximately 80% of the trips within the cordon area came from the Hospital, and the remaining 20% from the Campus. With respect to future impacts, the trip distribution should include a survey of the trip habits of the Hospital population as well as the campus population.

The DEIR identifies that the County of Santa Clara will continue to monitor and collect traffic data in the cordon areas to monitor trip increases or decreases across 16 gateways in the campus. Mitigation measure 5.15-2 allows the applicant to receive credits to offset increases in trips within the Stanford Campus by providing improvements within the Cordon Credit Area outside of the campus (see Figure 5.15-8 for cordon credit area and Figure 5.15-2 for cordon area).

With regard to this proposal, San Mateo County requests that Santa Clara County clarify the following:

- How are credits determined to offset increases in the number of trips in the cordon area?
- Mitigation 5.15-2 2.ii.b.1 notes that Stanford Hospital trips are excluded from the cordon count. Note that the Final Report 'Stanford University 2004 Traffic Monitoring Report' stated on page 13 that "most of the credits claimed are for the 77 passengers (mostly Stanford Hospital employees) getting on the shuttle outside the cordon area." San Mateo County notes that if the premise is that Stanford Hospital is a separate entity from Stanford University, it seems appropriate for passengers on the shuttle to be counted towards the TDM for Stanford Hospital and not counted again for the TDM for the University. San Mateo County requests that Santa Clara County provide further analysis as to this point.
- San Mateo County also requests that Santa Clara County clarify if Gateway #2 at Sand Hill Road shows an increase in number of trips above baseline, would a bicycle improvement project on Page Mill Road help to offset this increase thus allowing increased traffic at Gateway #2?
- San Mateo County further requests that Santa Clara County explain how it will determine which areas will receive priority funding for off campus circulation infrastructure improvements. Can each jurisdiction receive funding from Stanford to offset the increase in traffic without competing with other jurisdictions for these funds?

In light of the above questions and concerns, we suggest a mitigation measure requiring a Traffic Impact Analysis as part of each building permit application. This would provide an opportunity to check the assumptions made about traffic patterns against actual traffic conditions, and provide a more direct method for identifying the specific improvements that should be installed prior to or concurrently with the proposed construction.

Construction Truck Routes:

Please address the potential impacts of construction vehicles on pedestrian and bicyclist safety. In order to minimize such impacts, and reduce noise and traffic, truck traffic should be restricted on Alameda de las Pulgas, Santa Cruz Avenue, and Alpine Road, similar to the way in which truck traffic is being restricted within the Cities of Palo Alto and Menlo Park. Please have the applicant work with the County of San Mateo to identify designated truck routes and times of travel.

Vehicle Miles Traveled:

San Mateo County appreciates the analysis of the project's impacts on Vehicle Miles Traveled (VMT), in accordance with the directives of SB743 to phase out traditional Traffic Impact Analysis (TIA) methods for CEQA compliance. Notwithstanding SB743, local jurisdictions may continue to use TIA methods to evaluate impacts from developments on local intersections to ensure smooth operations at the local level.

In accordance with the proposed VMT guidelines published the Office of Planning and Research (OPR) in 2016, local jurisdictions are to develop their own significance criteria. The County of San Mateo does not currently have a VMT model, and hence has not published a Threshold of Significance for VMT for San Mateo County.

The project reviews VMT/capita for the Bay Area and Santa Clara County models with 17.33 and 13.08 VMT/per capita respectively. Since VMT is an estimate of the number of vehicles times the estimated miles traveled, there is variability in the data and methods of collection. Furthermore, the VMT/capita measurement is extremely sensitive as shown in the tables below:

Stanford Fall 2015 Existing Conditions

Residential VMT Summary

Demographics	Population	VMT	VMT/Capita	85% of Santa Clara	
Faculty/Staff	98	1656	16.9	$13.08 * 0.85 = 11.1$	
Graduate Student	6065	80359	13.2	11.1	
Undergraduate	6401	34299	5.4	11.1	
Post Doctoral	28	434	15.5	11.1	
Total	12592	116748	9.3	11.1	pass

San Mateo County notes that the population reflected in the above table includes undergraduate students who have limited access to vehicles and thus limited traffic impact to neighboring jurisdictions.

If undergraduates are removed from the analysis, the result is quite different, as shown in the table below:

Demographics	Population	VMT	VMT/Capita	85% of Santa Clara
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Faculty/Staff	98	1656	16.9	$13.08 \times 0.85 = 11.1$	
Graduate Student	6065	80359	13.2	11.1	
Post Doctoral	28	434	15.5	11.1	
Total	6191	82449	13.3	11.1	fail

While the proposed guidelines for VMT allows regional areas to compare VMT/ gross population for the area, these guidelines do not truly represent the experience of the road users on already congested roadways in the neighboring jurisdictions.

Also, since the VMT/capita measurement is based on population, in the case of the GUP, increases in vehicle miles traveled can be offset by increases in undergraduate population, which means that more traffic can be generated in the surrounding areas without triggering the threshold of significance under CEQA. Therefore, while the use of VMT in lieu of TIA has benefits in demanding alternative modes of transit, a standard methodology needs to be developed so that jurisdictions are using the same methods to calibrate their VMT/capita. For this project, the proposed VMT/capita calculations did not trigger a significance threshold under the County of Santa Clara's criteria, so no mitigation measures are proposed. However, the use of Santa Clara County's significance criteria to analyze impacts in other jurisdictions does not accurately represent the level of impact that will occur in areas outside of Santa Clara County, which may apply different thresholds of significance and thereby trigger the need for mitigation.

These concerns are exacerbated by the additional non-student trips that will accompany student and faculty population growth, such as those associated with deliveries, visitors, and a growing alumni population, which have not been adequately accounted for. Further analysis of these additional trips and their impacts is needed to provide an accurate prediction of the effects of the project on traffic and circulation.

The DEIR also refers to a Community Resource Group (CRG), which approved the Trip Reduction Credits Plan in 2003, which was required under Condition G, outlined in the 2000 GUP. However, the composition of the CRG is unclear. If this group will continue to play an important role in analyzing compliance with the new GUP and ensuring implementation of mitigation measures, we request more information about the CRG and the possibility of having San Mateo County representatives participate on the group.

3. Project Impacts on Unincorporated Areas Adjacent to Stanford's Redwood City Campus

In response to the Notice of Preparation (NOP), we requested that the DEIR address the impacts of the proposed project on areas of San Mateo County that are adjacent to the Stanford campus under construction in Redwood City. For example, we asked for an analysis of the impacts that would be caused by an increased amount of travel between the campuses. Unfortunately, such an analysis is not provided by the DEIR. Moreover, the analysis of traffic impacts appears to be largely based on a 2015 survey of student and faculty travel patterns, prior to the establishment of the Redwood City campus.

The GUP depends on the Redwood City campus to provide administrative support for the proposed expansion in academic programs and increase in student and faculty populations, as well as to provide the physical space for new development in areas of the main campus that were formerly occupied by administrative functions. As a result, it is reasonable to expect that the GUP will result in increased trips between the two campuses, and intensify the demand for housing and parking in the communities near both campuses, particularly in North Fair Oaks. The proximity of North Fair Oaks to the Redwood City campus, and its comparative affordability to other residential areas within reasonable traveling distance to the main campus, makes it more vulnerable to the traffic, housing, and parking impacts associated with University growth, which must be accounted for in the Final EIR.

4. Off-Site Housing Impacts

Our NOP comments also requested an analysis of the potential increase in housing costs, as well as the possible displacement of existing residents, due to increasing housing costs fueled by the greater demand for off campus housing by Stanford students, faculty, workers, and alumni. The current imbalance between employment growth and housing availability has grown to unprecedented levels, and the challenges of housing residents of all income levels has never been greater. The project's demand for an estimated additional 2,425 off-site housing units will certainly exacerbate this problem in ways that are likely to be significant. We were therefore surprised and disappointed to see the DEIR's housing-related conclusion that "no impact will result" (page 5.12-14). This statement conflicts with the determination on page 5.12-21 of the DEIR that housing and population growth impacts are "less than significant," with which we also disagree.

Whether or not this is a potentially significant environmental impact that must be addressed by CEQA under a narrow reading of the law, it is clearly one of that is of great concern to the surrounding communities and should be addressed by Santa Clara County's action on the GUP application. Stanford's proposal to continue to contribute \$20 per square foot of development to a Santa Clara County-administered affordable housing fund is inadequate in many ways. For example, we believe that the amount to be contributed is inadequate and that there need to be an established and transparent process for distributing these funds equitably amongst the impacted jurisdictions.

As noted above, many local jurisdictions within the region have recently prepared nexus studies to determine appropriate housing impact fees. There has also been a significant amount of discussion about how the use of such fees can be leveraged and coordinated to maximize their effectiveness. A similar level of analysis should be performed in order to determine the specific amount of housing impacts fees that should be contributed by Stanford, and how this money should be distributed and used.

5. Hydrology and Water Quality

Our comments on the Notice of Preparation identified items relative to stormwater detention that have not been adequately addressed in the DEIR. Among other things, the GUP should support or

compliment the efforts of the jurisdictions within the San Francisquito Creek Watershed to develop a specific plan for the detention of floodwaters on Stanford land that would result in a significant and measurable reduction in creek flows that could otherwise adversely affect or flood the downstream jurisdictions.

While the DEIR indicates that drainage patterns may be altered in such a manner that will result in additional storm water runoff being directed to the Creek, it concludes that this will not have adverse impacts on flooding. We believe a more detailed assessment is required before such a conclusion can be reached, and to this end request that the anticipated changes in drainage patterns be quantified and shown on drainage maps.

In addition, the proposed mitigation measures should be supplemented with greater details regarding the design parameters and performance standards for detention facilities and downstream creek improvements. These should be based on containment of flows from the 10-year and 100-year storm events, and present no net increase in storm water runoff to the neighboring downstream communities that are located within the watershed or affected by flooding from the Creek. In addition, mitigation measures should specify the timing of drainage improvements to ensure that they will be designed and implemented prior to or concurrently with proposed development.

6. Public Services and Facilities

San Mateo County is concerned about the impact that the proposed growth in Stanford's student, faculty, and employee populations will have on public facilities, such as parks and libraries, and we are also concerned that such growth will strain public services, such as police and fire protection, beyond their current capacities. Although Stanford provides recreational opportunities on campus, there are many other highly valued park and open space areas that provide different recreational opportunities to those that are available on campus. For example, it is reasonable to assume that Stanford students, faculty, and employees enjoy the parks and beaches along San Mateo County's coastline, as well as the hiking and biking trails located in the County's rural and coastal areas. The analysis contained in the DEIR does not adequately assess this demand, and its conclusion that such impacts will be insignificant is therefore unsupported.

With regard to public services, we are concerned about the impact that University growth will have on first responders such as police and fire protection. In addition to causing delayed response times as a result of increased traffic congestion, the University's growth will increase the demands on limited personnel and equipment, and thereby increase demands for mutual aid, which has not been addressed by the DEIR.

7. Noise

Please expand the analysis of noise impacts to address the noise and vibration attributable to construction vehicle use of roadways with residential areas of San Mateo County.

8. Statement of Overriding Considerations

Because the project will result in significant unavoidable impacts, Santa Clara County must adopt statements of overriding consideration if it approves the project. The DEIR does not, however, contain any rationale for adopting such findings. An explanation of the requirements for such findings, and the basis under which such findings could be made, should be provided.

9. Alternatives

In addition to the four project alternatives identified and evaluated by the DEIR, San Mateo County suggests the development and analysis of a fifth option that applies a phased approach to GUP implementation. For example, the GUP could be divided into four phases, with discretionary and supplementary environmental review by Santa Clara County prior to the construction of each phase. This would enable San Mateo County and interested parties to evaluate the adequacy of proposed mitigation measures, and make adjustments where new information or changed circumstances arise, which is particularly important in light of the current absence of specifics regarding the particular types of academic facilities that will be built, as these details will have an effect on the actual environmental impacts that will result.

10. Additional Comments

A summary of the verbal comments submitted at the community meeting conducted by San Mateo County, and copies of written correspondence submitted to San Mateo County by County residents are attached to this comment letter and are incorporated by reference herein.

Thank you for your consideration of these comments. 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