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October 2, 2019

Mr. Geoff Bradley

Consultant to Santa Clara County, Stanford University 2018 General Use Permit

M Group

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Campbell CA 95008

Subject: Update on City of Palo Alto Comments on the Stanford Community Plan Amendment to the Santa Clara County General Plan

Dear Mr. Bradley,

The City of Palo Alto has previously commented on the Stanford University Community Plan in our letter of June 27, 2019. However, since the County Planning Commission recommended the Stanford Community Plan to the Board of Supervisors without addressing any of our concerns, we would like to clarify them and ask that as the Plan goes forward these amendments are included in the draft submitted to the Board for their action.

Palo Alto's goal is to see that the Stanford Community Plan reflects the additions to the project and intention of the conditions of approval recommended by the County Planning Commission to the Board of Supervisors. As noted below we feel that in two areas, foothills and transportation and traffic, the linkage of the project to the Plan as currently recommended by the County is not complete. We would request that the following changes be made to the Plan.

- Protection of the Foothills (pages 35-36) and Lands Outside the Academic Growth Boundary (page 72-82): Add a policy that *requires that the Foothills District open space area be protected for 99 years with a 4/5 vote of the Board of Supervisors requirement for change in land use or development.* We would request that the current use of the Foothills District continue as Open Space and Field Research, and no new development be allowed within the Foothills Development District except for the completion of the 1,500 SF remaining from the 2000 GUP. We are particularly concerned that since the Stanford Community Plan is a part of the County General Plan that it can be amended by a simple majority of the Board (3/5 vote). Such amendment could allow, at any time, significant land use and zoning change to this important open area. The super majority vote (4/5) and 99-year requirement are particularly important if the conditions of approval do not address the duration of protection or the supermajority vote limit for



the Foothills. It is not sufficient to require a super majority vote for 99 years for extension of the Academic Growth Boundary because, as it stands, the Foothills District could be acted on independently for a substantial change in land use and zoning not directly related to academic/academic support uses at any time in the future.

- Community Plan Strategies for Circulation: Add Strategy # 4 Alleviate local and regional impacts from increases in Reverse Commute and Average Daily Trips generated by the Stanford Campus through transportation demand management and trip credit projects. (p. 123). The project and environmental review as recommended by the County Planning Commission includes expansion of the NNNCT model to include reverse commute trips and increased ADT generated by the project with 2.25M SF of academic/academic support space and enhanced housing requirements over the next 35 years. The project evaluation recognizes that impacts on traffic and transportation are no longer limited to ingress and egress at peak hours and include reverse peak hour trips on and off campus, trips generated throughout the day/night as well as impacts on regional and mass transit carriers. The strategies should be amended to recognize these changes and promote appropriate policies and implementations such as trip credits and other projects and programs to address the strategy.
- Require Stanford to participate in off-campus trip reduction efforts: Implementation Plan SCP-C(i)13 Amend this Implementation to state: *Stanford shall work cooperatively with surrounding jurisdictions to achieve the development and implementation of solutions to shared regional transportation problems.* (Page 143) Currently the Plan only 'encourages' Stanford to reduce travel in the non-commute hours. The failure to define this obligation of Stanford to address regional transportation access in the Plan is a significant gap in the Stanford Community Plan Amendment. This implementation should 'require' that Stanford contribute its fair share toward providing regional transportation access to the campus and for Stanford affiliates. Clearly the EIR demonstrates that increasing the housing on campus as well as increased academic activity drawing people to a growing campus will have impacts on the regional transportation systems serving the campus and adjacent jurisdictions. Further the Plan identifies Caltrain as an important factor in access to the campus (P. 124) and notes that Caltrain plays a significant role in the Transportation Management Demand programs to make the NNNCT model work (p. 137). The current text states 'when system expansions are needed, Stanford's responsibility for contributing to the cost of projects needs to be considered.' (P. 142-144) Clearly the Implementation Plan should support these statements and underscore Stanford's financial responsibility.
- Update/Clarify the No Net New Commute Trips requirements (Chapter 4- Circulation pp. 121-152): Amend Policy SCP-C1 that addresses the NNNCT *to include the following requirements:*
 - *Extend the peak period definition to three hours;*
 - *Establish and meet a benchmark for reverse commute trips at peak hour and peak period or off-set their impact; and*



- *Establish and meet a benchmark Average Daily Trips and implement programs to off-set the impacts of increased ADT.*

The County Planning Commission recommended conditions of approval expanding the No Net New Commute Trips Model that is at the core of the transportation and traffic planning policies and implementation of the Plan. The policies in the Plan do not align with the direction of the Planning Commission recommended conditions of approval. Given the substantial increase in academic space, academic support space, and residential units within the Academic Growth Boundary asked for by the County in the project, these additions to the NNNCT model are essential to maintaining acceptable circulation levels within Palo Alto and in the County. The current Policy SCP -C 1 as stated only addresses peak hour trips: "Apply a 'no net new commute trips' standard for campus related trips in the commute direction during peak hours to the fullest extent possible". The policy does not reflect the revisions to address reverse commute and ADT currently included in the Project Conditions of Approval recommended by the Planning Commission and supported by the City of Palo Alto.

- Require Stanford to participate in off-campus trip reduction efforts: Based on the 2018 GUP conditions of approval and environmental documents the policies and implementation measures in the Circulation section require more rigor. The following should be added:
 - a new policy should be added to: *require that Stanford establish a baseline for Reverse Commute trips caused by new housing on campus and develop strategies to address managing them consistent with adopted baselines. (Page 139)* Particularly to address the additional housing on within the AGB approved by the Planning Commission
 - Current Policy SCP-C7 should be amended to: *Require that Stanford create a baseline of Average Daily Trips, measure them regularly, and develop strategies to address managing ADT programmatically so that the numbers are consistent with adopted benchmarks. (Page 139)*
 - Implementation Recommendation SCP-C(1)6 should be strengthened: *Require Stanford to identify opportunities and develop proposals for participation in off-campus trip reduction efforts. Apply trip reduction credits to the annual calculation of Stanford compliance with the 'no net new commute trips' model.*
 - Add Implementation Recommendation: *Require that Stanford shall measure and address trip reduction mitigations for all reverse commute trips generated during a.m. and p.m. peak hour. The trip management shall be based on a baseline established in 2023. Where compliance is not possible Stanford shall work with adjacent jurisdictions to provide appropriate relief. (Page 140)*
 - Add Implementation Recommendation: *Require that Stanford shall measure, and address maintenance of Average Daily Trips generated by the campus on the basis of baseline established in 2023. Where compliance is not possible Stanford shall work with adjacent jurisdictions to provide appropriate relief. (Page 140)*



The City of Palo Alto appreciates the opportunity to update our comments on the June 27, 2019 Draft of the Stanford University Community Plan Amendment to the Santa Clara County General Plan. We believe that the addition of these strategies, policies and implementations into the Plan will better align the Project (2018 GUP) as recommended by the Planning Commission with the Stanford Community Plan. If you have any questions please contact Jonathan Lait, Director of Planning & Development Services at Jonathan.Lait@cityofpaloalto.org or (650) 329-2404.

Sincerely yours,



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