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DATE: June 13, 2019

TO: Planning Commission

FROM: Sylvia Gallegos, Deputy County Executive
Jacqueline R. Onciano, Director, Dept. of Planning and Development

SUBJECT: Stanford General Use Permit Application, EIR, and Associated Approvals

RECOMMENDED ACTION

Continued Public Hearing from May 30, 2019 (Item No. 4) to consider the following: Stanford University General Use Permit (GUP) Application (Application), Stanford GUP Environmental Impact Report (EIR), Stanford University Community Plan amendments, and Zoning Ordinance amendments. Location: Stanford University Community Plan Area. Zoning: A1 General Use, R1S Low-Density Campus Residential, R3S Medium-Density Campus Residential; OS/G Open Space and Field Research; SCA Special Conservation Area. Supervisorial District: 5. File Nos. PLN98-7165 (7165-98P-99GP-99EIR) and PLN16-7165 (7165-16P-16GP-16Z-16EIR).

Possible action:

- a. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding the Stanford University Final Environmental Impact Report;
- b. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding findings for the significant environmental impacts of Alternative A, authorizing up to 2,807 student beds and 2,892 housing units, including adoption of a Statement of Overriding Considerations, as set forth in a forthcoming **Attachment A**;
- c. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding the proposed Mitigation Monitoring and Reporting Program (MMRP), as set forth in **Attachment B**;
- d. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding text amendments and land use map amendments to the Stanford University Community Plan, as set forth in **Attachment C**, based on findings as set forth in **Attachment E**;

- e. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding the Zoning Ordinance Map amendments, as set forth in **Attachment D**, based on findings as set forth in **Attachment E**;
- f. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding the General Use Permit, based on findings as set forth in **Attachment E** and subject to Conditions of Approval, as set forth in **Attachment F**;
- g. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding the Water Supply Assessment, as set forth in **Attachment G**; and
- h. Forward a favorable or unfavorable recommendation to the Board of Supervisors regarding the Development Agreement Application.

The Board of Supervisors is required to affirm certain findings of fact to approve or deny the subject applications. As a recommending body to the Board of Supervisors, the Planning Commission is being asked to review all information in the record, receive public testimony and provide a recommendation to the Board of Supervisors. The required findings of fact for approval of the Community Plan amendments, Zoning Ordinance Map amendments, and the General Use Permit are located in Attachment E. In making a recommendation, the Planning Commission shall carefully consider the findings.

The Application submitted by Stanford requests authorization from the County of Santa Clara to construct up to 3,500,000 additional net new square feet of academic space/student beds, 550 faculty/staff housing units, 40,000 square feet of childcare/trip reducing facilities, and 50,000 square feet of temporary surge space.

The Stanford University General Use Permit Final Environmental Impact Report (EIR) was published by the County in December 2018 and evaluates potential environmental impacts from the project as proposed by Stanford University in the Application. A complete environmental analysis for Additional Housing Alternatives A and B was also prepared and circulated for public comment by the County, and included in the EIR, to evaluate the environmental impacts of constructing additional housing to accommodate the academic development proposed in the Application. Additional Housing Alternative A evaluated the environmental impacts of constructing an additional 2,549 units/beds above what Stanford proposed in its Application, analyzing a total of 2,892 housing units and 2,807 beds. Additional Housing Alternative B evaluated the environmental impacts of constructing an additional 1,275 units/beds above what Stanford proposed in its Application, analyzing a total of 1,825 housing units and 2,600 beds.

The Department of Planning and Development is recommending to the Planning Commission to forward a favorable recommendation to the Board of Supervisors to adopt Additional Housing Alternative A, and to condition the project to require a minimum of 2,172 housing units and a maximum 2,892 housing units, and a minimum of 2,600 student beds and a maximum of 2,807 student beds.

The Planning Commission may consider and recommend Additional Housing Alternative A, the project as applied for by Stanford University, or one of the other alternatives in the EIR. If the Planning Commission recommends the project as applied for by Stanford University or one of the other alternatives evaluated in the EIR, the Department will return to the Planning Commission with a revised set of Conditions of Approval and findings to reflect the Planning Commission's recommendation.

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EXECUTIVE SUMMARY

The matter before the Planning Commission is to provide a recommendation to the Board of Supervisors regarding several approvals and actions related to the Stanford University General Use Permit (GUP), including:

- Certification of Environmental Impact Report
- Stanford University Community Plan amendments
- Zoning Map amendments
- General Use Permit, subject to conditions of approval
- Water Supply Assessment
- Development Agreement application

The Stanford University GUP Application is the largest development application in the County's history – 3.5 million square feet of new academic space/student beds and 550 faculty/staff housing units. This proposal would increase the total development building area on the Campus to 20,400,000 square feet. The Stanford Application is significant and unique in unincorporated Santa Clara County in terms of the amount of development, the extended timeframe of its implementation, and the project's environmental impacts affecting the region.

The Stanford GUP proposal addresses approximately 4,017 acres of Stanford University lands in unincorporated Santa Clara County located adjacent to the Cities of Palo Alto and Menlo Park, the Towns of Woodside and Portola Valley, and unincorporated areas of San Mateo County. This includes the main Stanford campus area located generally north of Junipero Serra Boulevard (approximately 1,800 acres) and the largely undeveloped Stanford foothills located generally south of Junipero Serra Boulevard (approximately 2,200 acres). It does not include other Stanford lands located in adjacent jurisdictions.

Community Plan Amendments

The existing Stanford Community Plan (SCP) provides a strong **policy framework** to ensure that the University's proposed growth does not negatively impact the surrounding communities. The Department also provides recommended amendments to the Community Plan, based on County ordinances and policies and Board direction, and general updates to bring the SCP up to date with current conditions. These updated Community Plan policies, considered for adoption in tandem with the proposed General Use Permit, address updates to background text and figures to reflect current information and updates to policies and implementation measures to reflect current conditions. The recommended Conditions of Approval for the GUP are consistent with these Stanford Community Plan amendments.

General Use Permit

The Department is recommending that the Planning Commission forward a recommendation to the Board of Supervisors to adopt the General Use Permit for Stanford, as modified under the Conditions of Approval. These modifications to the General Use Permit will require Stanford to:

- Provide a minimum of 2,172 Housing Units to meet housing demand associated with the proposed development of 3.5 million square feet of new academic space/student beds at the campus;
- Ensure that ongoing development at Stanford avoids worsening traffic congestion in the region by adhering to the No Net New Commute Trips (NNNCT) standard, in addition to standards minimizing new reverse commute traffic and average daily trips, subject to ongoing monitoring and enforcement;
- Limit growth in on-campus parking, consistent with the proposed requirements for reduction of automobile trips;
- Preserve open space and natural resources by focusing new development within the Academic Growth Boundary (AGB) and limiting development outside the AGB;
- Obtain phased authorization of development within the General Use Permit, ensuring that Stanford complies with the Conditions of Approval before authorizing additional development phases;
- Fund a Municipal Services Study to identify service needs of the Stanford community, and provide for those services;
- Fund an updated El Camino Real Frontage Plan for Stanford lands along the south side of El Camino Real to identify standards for future development;
- Prepare and implement an updated Master Drainage Plan to achieve a storm drain system that avoids increases in frequency, severity, or lateral extent of flooding in San Francisquito and Matadero Creeks; and
- Fund a Parks study to determine the types and acreage of park facilities needed to serve the population associated with future development, and provide those facilities.

Development Agreement

On June 19, 2018, the Board approved a Zoning Ordinance generally authorizing the use of a development agreement (DA). A development agreement is a voluntary contract entered into by a public agency and applicant to enable a public agency to obtain community benefits from an applicant beyond a level that can be obtained through existing regulations and the exercise of its police powers. Because a DA is a voluntary contract, it is not required for purposes of the County's processing and consideration of the GUP application.

On October 16, 2018, the Board authorized County staff to enter into a negotiation process for a possible development agreement with Stanford University. The Board also appointed

two members of the Board to serve on an Ad Hoc Committee to provide guidance to County staff.

On April 16, 2019, the Ad Hoc Committee suspended development agreement negotiations with Stanford as a result of the University reaching a tentative agreement with the Palo Alto Unified School District (PAUSD) for school benefits. The tentative agreement between Stanford and PAUSD was conditioned on approval of a development agreement between the County and Stanford. On May 10, 2019, the University suspended its actions on the agreement with PAUSD.

While there have been communications between the County and the University about the terms in which DA negotiations may resume, at the time of the preparation of this report, there is not currently a plan to resume negotiations. Therefore, the Administration recommends at this time that the Planning Commission forward a recommendation to the Board to deny Stanford's application for a development agreement. If, in the future, negotiations result in a proposed development agreement, the County Administration would present it to the Planning Commission at a hearing.

In summary, staff recommends that the Planning Commission recommend to the Board of Supervisors the following:

- a. Certify the Stanford University Final Environmental Impact Report.
- b. Adopt the required findings pursuant to the California Environmental Quality Act regarding the significant environmental impacts of Alternative A, authorizing up to 2,807 student beds and 2,892 housing units, including adoption of a Statement of Overriding Considerations, as set forth in a forthcoming **Attachment A**;
- c. Adopt the proposed Mitigation Monitoring and Reporting Program (MMRP), as set forth in **Attachment B**;
- d. Approve the text amendments and land use map amendments to the Stanford University Community Plan, as set forth in **Attachment C**, based on findings as set forth in **Attachment E**;
- e. Approve the Zoning Ordinance Map amendments, as set forth in **Attachment D**, based on findings as set forth in **Attachment E**;
- f. Approve the Stanford General Use Permit, based on findings as set forth in **Attachment E**, and subject to the Conditions of Approval, as set forth in **Attachment F**;
- g. Approve the Water Supply Assessment, as set forth in **Attachment G**; and
- h. Deny the Development Agreement Application.

Department's Recommendations

Nineteen years ago when the Board of Supervisors approved the 2000 Stanford GUP, as modified by Conditions of Approval, and adopted a Community Plan, innovative Growth and Development, Housing, Circulation, and other pioneering strategies were incorporated to effectively address impacts from proposed development in the Community Plan area. The Housing Linkage Policy, for example, which linked the construction of housing in tandem with development of academic space, based on a ratio of one housing unit per 826 gross square feet of academic space, set a new standard, along with the other housing strategies, in addressing the supply and affordability of housing in a region that already had a significant jobs-housing imbalance. The 2000 GUP and Community Plan have served both Stanford University and the surrounding communities very well during these past nineteen years and continue to be strong foundations for guiding future development.

The Stanford proposal, if approved, would result in an additional 3.5 million square feet of new academic space/student beds, increasing the total development building area to 20.4 million square feet. Since adoption of the 2000 Stanford Community Plan and GUP, housing affordability has worsened in Santa Clara County to the point of crisis, which is most acute in the communities and neighborhoods surrounding Stanford University.

Currently, there are 3.49 jobs for every housing unit in Palo Alto, the worst imbalance of cities in Santa Clara County, and the median home value is over \$3 million. The construction of over 3.5 million square feet of new development by Stanford would intensify demand for housing in this area as new workers who are either directly employed by Stanford or provide services to the Stanford community seek housing in the area. Recognizing both the existing housing affordability crisis in the Stanford area and the acute housing impacts associated with Stanford's additional growth, the Department is recommending Conditions of Approval for the Stanford GUP requiring that the University provide 2,172 housing units to fully meet the demand created from its ongoing growth.

Correspondingly, the Community Plan and recommended Conditions of Approval also provide foundational policies and requirements regarding traffic management associated with Stanford Campus development. The 2000 GUP contains conditions requiring that Stanford adhere to a No Net New Commute Trip standard to avoid worsening congestion in surrounding neighborhoods and the region. The recommended Conditions of Approval for Stanford recognize that traffic congestion has continued to worsen in the neighborhoods and region surrounding Stanford University.

The recommended Conditions of Approval thus require Stanford to adhere to the No Net New Commute Trip standard and require ongoing traffic management and monitoring in additional traffic control measures, including Reverse Commute Trips and Average Daily Trips – two types of traffic that could substantially worsen traffic congestion in the

surrounding neighborhoods. In addition, given the worsening congestion on roads surrounding Stanford, the conditions mandate that ongoing development at Stanford would be suspended following a public hearing process if Stanford does not adhere to the No Net New Commute Trips standard.

Comparison Table

Stanford's Proposal and Planning Department Recommendations

Project Item	Stanford's Proposal	Departmental Recommendation
Faculty/Staff Housing Units -TOTALS	550 faculty/staff units	Minimum of 2,172 units Maximum of 2,892 units
<ul style="list-style-type: none"> Faculty/Staff Housing; Market Rate Units 	550 faculty/staff units	Minimum of 1,041 units Maximum of 1,646 units
<ul style="list-style-type: none"> Faculty/Staff Housing; Affordable Units 	Pay \$20 per square foot in-lieu fees	Min. 933 mitigation units Min. 198 inclusionary units 1,131 Total
Student Housing - TOTALS	2,600 student beds	Min. 2,600 beds Max. 2,807 beds
<ul style="list-style-type: none"> Undergraduate Beds 	1,700 beds	Min. 1,700 beds
<ul style="list-style-type: none"> Grad. Student Beds 	900 beds	Min. 900 beds
<ul style="list-style-type: none"> Affordable Student Housing 	Half of the graduate student beds to meet Housing Element affordability requirements	The matter of counting graduate student beds as affordable will be reconsidered during the next update of the County's Housing Element in approx. 2022 - 2023
Traffic	Continue No Net New Commute Trips (NNNCT) standard	Continue NNNCT and add: <ul style="list-style-type: none"> Peak 3-hour Periods Reverse Commute Trips Average Daily Trips
Traffic Exceedance	Pay a portion of the fair share fees for intersection improvements (based on a per trip over the limit fee basis)	Pay fair share fees for intersection improvements plus suspend development following the procedures set forth in the conditions of approval
Parking	Allow up to 1,480 net new spaces plus a 2,000 space "parking reserve"	Allow up to 1,480 net new spaces. No "parking reserve"
Open Space	No change to existing policy for 4/5ths vote to modify AGB, which expires in 2025	Extend policy for 4/5ths vote of the Board of Supervisors to modify AGB to 99 years; to expire in 2118
Community Plan Changes	Change the golf Driving Range site from Medium Density Residential to Academic Campus and other minor changes in the San Juan District	Accept Stanford's request and update maximum academic development from 17.3M to 20.4M square feet. Update background text, figures, policies, and implementation plans to reflect current conditions.
Zoning Changes	Change the golf Driving Range site from R3S to A1 and other minor changes in the San Juan District	Accept Stanford's request and create and apply a new Campus Open Space zoning district to the existing campus open space areas consistent with the Community Plan

The Department is recommending adoption of the GUP with the Conditions of Approval requiring Stanford to build 2,172 housing units to address the housing demand associated with the construction of 3.5 million new square feet of development. The environmental impacts of constructing this additional housing were evaluated as Alternative A within the Stanford GUP Environmental Impact Report (EIR) prepared for the project. The EIR discloses that construction of Alternative A would have more significant environmental impacts than the proposed GUP application submitted by Stanford. Specifically, the EIR discloses that the construction of this additional housing would have additional significant environmental impacts related to air quality emissions and traffic impacts. These additional environmental impacts are related to potential additional traffic and construction activity associated with the additional housing units and on-site residents at Stanford University.

Despite the potential for these additional environmental impacts, the Department is recommending the Board of Supervisors adopt the Conditions of Approval requiring the construction of 2,172 housing units to ensure that Stanford fully addresses housing demand from construction of an additional 3.5 million square feet of development. If the County does not require Stanford to provide sufficient housing to address housing demand, ongoing development at Stanford would exacerbate the housing affordability crisis that acutely impacts the areas around the University.

Resulting impacts would include an increase in the percentage of families living in substandard housing and longer commute times as workers are compelled to find affordable housing outside of the region. This deficiency in housing and decrease in affordability worsens social inequity throughout the region, creating more displacement and socio-economic fragmentation in local communities. The need to address these broader socio-economic impacts by ensuring that Stanford fully mitigates the housing impacts of its increased development outweigh the significance of the additional environmental impacts disclosed within the EIR.

I. PROJECT DESCRIPTION

The proposed project consists of an application by Stanford University for a new General Use Permit (GUP) and associated amendments to the Stanford Community Plan and Zoning Map to authorize new development of academic, housing, and other associated uses on the Stanford campus to meet the University's facility needs through the year 2035, and an application by Stanford for a Development Agreement.

Additional project approvals, not a part of Stanford's application, include Amendments to the Stanford University Community Plan proposed by the Department, and a Water Supply

Assessment required for the project pursuant to State law. Each of these project elements is summarized below.

A. Stanford University General Use Permit Application

Stanford’s GUP Application seeks programmatic authorization of specified levels of academic, housing, and support uses within the Stanford University Campus located within unincorporated Santa Clara County, subject to site-specific approvals at the time each individual building project is proposed. This framework and approach are consistent with the 2000 GUP in that the GUP is a programmatic approval for a scale of development over a specified time period.

The GUP Application is intended to replace the approved 2000 General Use Permit (2000 GUP) for the additional development requested by Stanford to be authorized under the new GUP. The GUP Application also requests specific provisions in regard to the location of development, housing linkage and affordability, trip credits, alternative mitigation, and parking, and makes specific commitments regarding safe routes to school improvements, sustainability programs, and off-site park maintenance, as described further below.

Proposed Development

Table 1 provides a summary of Stanford’s proposed development in the GUP Application and the remaining authorized, but-not-yet-constructed, development from the 2000 GUP. In summary, Stanford is proposing to construct 2,275,000 net new square feet of Academic / Support space and 3,150 net new housing units/beds on the campus.

Table 1. Stanford’s Proposed Uses and Development Levels

Development Type	Proposed GUP	Proposed Carry-Over from 2000 GUP	Total Proposed
Academic/ Support	2,275,000 sf	182,920 sf ¹	2,457,920 sf
Housing Units/Beds	3,150 ²	N/A	3,150
Childcare Space/Trip Reduction Uses	40,000 sf	N/A	40,000 sf
Temporary	50,000 sf at a	N/A	50,000 sf at a

¹ Of the total 2,035,000 sq. ft. approved under the 2000 GUP, this is the remaining amount, as of February 2019, that has not been constructed and for which no application for architecture and site approval or building permit has been submitted. The actual carry-over amount will be determined on the effective date of the GUP.

² No more than 550 of these proposed units/beds would be housing units for faculty and staff.

Construction Surge Space (Trailers)	time		time
Development Outside AGB	0	N/A	0
Parking	2,000 space reserve ³	1,480 spaces	3480 spaces

Distribution of Development

The GUP Application proposes distribution of new academic/academic support and housing by the development districts indicated in **Table 2**. The configuration of these development districts, as set forth in the 2000 GUP and including proposed minor changes to the district boundaries in the current application, are shown in **Figure 1 of Attachment J**.

Approximately 80% of the development (1,800,000 s.f.) is proposed to occur in the Campus Center district. Similar to provisions within the 2000 GUP, the application proposes allowance for shifting of development between districts, subject to County review and approval. The GUP Application proposes a process to transfer development to the Foothills District, but not to the Arboretum District.

Table 2. Stanford’s Proposed Development by Development District

Development District	Housing (# Units/Beds)	Academic/Academic Support Space (net new sq. ft.)
Quarry	550	200,000
Arboretum	0	0
DAPER & Administrative	0	200,000
Campus Center	200	1,800,000
East Campus	1,600	20,000
West Campus	0	35,000
Lagunita	800	0
Lathrop	0	20,000
San Juan	0	0
Foothills	0	0
Total	3,150	2,275,000

³ Stanford proposes Planning Commission review and approval prior to implementation of these spaces.

Housing Linkage

The GUP Application proposes to link construction of housing to occur in tandem with development of academic space based on the same ratio included in the 2000 GUP: 1 housing unit/826 gross square feet (gsf) of academic space. **Table 3** shows the proposed requirement for housing unit/bed construction for each 500,000 square feet of net new academic development. The proposed housing linkage applies to 2,753 of the total 3,150 units/beds proposed by the GUP Application. There is no proposed timeframe for construction of the approximately 400 units/beds not linked to academic development.

Table 3. Stanford's Proposed Housing Linkage

Academic and Academic Support Space (net new gsf)	Housing Units/Bed at 1/826 new gsf	Cumulative # Housing/Bed
0-0.5M	605	605
0.5-1.0M	605	1,210
1.0-1.5M	605	1,815
1.5-2.0M	605	2,240
2.0-2.275M	333	2,753

Affordable Housing

The GUP Application proposes construction of affordable housing units and payment of fees as indicated in **Table 4**. Stanford's proposed affordable housing fee is \$20 per square foot, which is lower than the current affordable housing fees paid by Stanford as part of the 2000 GUP.

Table 4. Stanford's Proposed Affordable Housing Contribution

Contribution Type	Contribution Amount
Affordable Housing Units	450 (of 900 total) graduate student housing units that meet the affordability requirements for Moderate Income residents.
Affordable Housing Fees	\$20 per s.f. of academic space contribution to the County's Stanford Affordable Housing Fund

Transportation

In the GUP Application, Stanford states a continued commitment to the No Net New Commute Trips standard implemented through the University's Transportation Demand Management (TDM) Program, and proposes traffic conditions of approval as summarized in

Table 5. This standard seeks to hold constant the number of commute trips to the Stanford campus during the AM peak hour and from the Stanford campus during the PM peak hour (measured at campus gateway intersections along a cordon) as compared to 2001 baseline counts.

Table 5. Stanford’s Proposed Traffic Conditions of Approval

Traffic Monitoring Equipment
<ul style="list-style-type: none"> • Allow installation of automated equipment (such as, imbedded loop detectors, video detection, or license plate recognition) to facilitate traffic monitoring at the 16 specified campus gateways.
Trip Reduction Credits
<ul style="list-style-type: none"> • Allow trip reduction credits for trip reduction efforts where only one of the two trip ends is located within the trip credit area (Figure 2 of Attachment J) boundary. (As an example, based on this provision, Stanford could apply for trip reduction credits for funding a shuttle bus route where one end of the route is located in the trip credit area, but the other end extends outside the area.) • Allow funding of off-campus circulation improvements located within the trip credit area (Figure 2 of Attachment J) to qualify for trip reduction credits so long as the improvements enhance safety or increase mobility for pedestrians, bicyclists, or transit users.
Traffic Mitigation Funding
<ul style="list-style-type: none"> • If Stanford cannot achieve the No Net New Commute Trips standard, allow Stanford the option of funding other entities’ trip reduction programs rather than funding its proportionate fair-share of intersection improvements. The amount of the payment would be based on Stanford’s share of the improvement costs that would otherwise be required. • If Stanford exceeds the No Net New Commute Trips standard, the GUP Application proposes a payment calculation methodology that does not ensure full payment of Stanford’s fair-share of the intersection mitigation improvement costs, but rather, requires that Stanford pay a portion of the fair share costs based on the number of trips by which Stanford exceeds the No Net New Commute Trips standard.

Vehicle Parking

Stanford’s GUP Application proposes to “carry over” unused parking from the 2000 GUP, create a new parking reserve, and change how parking is counted, as summarized in **Table 6**.

Table 6. Stanford’s Proposed Parking

Proposed Parking	
2000 GUP Carry Over	1,480 spaces
Parking Reserve*	<u>2,000 spaces</u>
Total Net New Parking	3,480 spaces
Maximum On-site Parking	23,651 spaces
Proposed Parking Reserve Activation Process	
Activation of the parking reserve requires Planning Commission approval based on one of the following:	
<ul style="list-style-type: none"> • Stanford is achieving the no net new commute trips standard; or • Such parking serves a purpose that is not likely to result in substantial increase in peak hour commute trips; or • Unforeseen circumstances occur due to changes in background conditions that require provision of additional parking. 	
Types of Parking Spaces Proposed to be Exempted from the Parking Count	
<ul style="list-style-type: none"> • Trip-reducing program spaces (examples are rental car and zip car spaces) • Electric vehicle charging station spaces • Spaces for police and fire department use • Spaces for on-campus high density housing 	

* The parking reserve consists of parking spaces that may be added to the parking cap with approval by the Planning Commission.

Other Commitments

The Stanford GUP application makes specific commitments relative to infrastructure improvements, safe routes to school, and sustainability programs. These commitments are summarized in **Table 7**.

Table 7. Stanford’s Proposed Improvements, Sustainability Programs

Safe Routes to School On-Campus Infrastructure Improvements
<ul style="list-style-type: none"> • Circulation improvements on Stanford lands in unincorporated Santa Clara County, in and around Nixon Elementary School, which could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, and wayfinding signs. • Circulation improvements in and around Escondido Elementary School, which could include such items as improved crosswalks with high-visibility yellow markings, pavement markings, additional signage, and additional traffic control. Specific improvements on Stanford property could include an enhanced mid-block crosswalk on Escondido Road.
Sustainability Programs
<ul style="list-style-type: none"> • For the life of the GUP, all construction equipment, except for chainsaws and paving phase equipment, will meet final Tier 4 air quality standards. • All Marguerite buses will be electric by 2035. • 70% of Stanford Land Buildings and Real Estate and Bonair fleet vehicles will be electric by 2035. • During the life of the GUP, Stanford will rely heavily on low-water demand, native plants for new landscaping.
Contribution for Off-Campus Parks
<ul style="list-style-type: none"> • Provide to the City of Palo Alto a one-time payment towards improvements identified by the City of Palo Alto (\$375,000) for tennis court upgrades at Terman and Weisshaar Park and upgrade and renovate safety and accessibility of the playground and other features in Cameron Park.

B. Land Use Map and Zoning Map Amendments - Proposed by Stanford

In association with the GUP Application, Stanford proposes to amend the Stanford University Community Plan (SCP) Land Use Map and the Zoning Map designations for the driving range and nine housing sites. The existing and proposed land use designations and zoning districts are summarized in **Table 8**. The proposed land use designations are shown in **Figures 3 and 4 of Attachment J** and the proposed zoning districts are shown in **Figures 5 and 6 of Attachment J**.

Table 8. Stanford’s Proposed SCP Land Use Map and Zoning Map Amendments

Location	Community Plan Land Use Map Amendments		Zoning Map Amendments	
	Existing Designation	Proposed Designation	Existing Designation	Proposed Designation
Driving Range Site	Campus Residential – Medium Density	Academic Campus	R3S – Medium Density Campus Residential	A1 – General Use
Faculty House Sites	Academic Campus	Campus Residential – Low Density	A1 – General Use	R1S – Low Density Campus Residential

C. Stanford Community Plan Text Amendments Proposed by Stanford

Stanford proposes minor changes to the text of the Stanford Community Plan (SCP) Housing Chapter that would generally remove information identifying specific housing sites and instead refer to the housing site information in the General Plan Housing Element 2015-2022. Stanford notes that the Housing Element contains a more frequently updated description of planned housing on Stanford lands. The proposed amendments are summarized below:

- Under Strategy #1, remove and revise outdated text regarding future housing;
- Remove Figures 3.1 – Potential Housing Sites; Tables 3.2 – Proposed Housing Development Potential and 3.3 – Planned Housing and Sites; and references to these Tables.
- Add statements under Strategy #1A, indicating that the SCP can be amended in the future to add low and medium density housing areas and that no SCP amendments are needed to identify housing sites in the Academic Campus land use designation.

Stanford’s proposed amendments to the SCP, with revisions shown in underline and strike out, are provided in **Attachment H**.

D. Development Agreement

On June 19, 2018, the Board of Supervisors approved a Zoning Ordinance authorizing the use of development agreements and establishing procedural standards for their adoption and maintenance. A development agreement is a voluntary contract entered into by a public agency and applicant and enables a public agency to obtain community benefits from an applicant beyond a level that can be obtained through existing regulations and the exercise of

its police powers. Because a development agreement is a voluntary contract, it is not required for purposes of the County's processing and consideration of the GUP application.

The Ordinance requires "[a] public hearing on an application for a development agreement must be held by the Planning Commission and the Board of Supervisors." The Board of Supervisors is the designated approving authority for a development agreement.

Stanford University submitted a development agreement application on July 27, 2018. The application was determined incomplete by the Department of Planning and Development. Stanford University submitted a supplemental application on September 14, 2018. The application was deemed complete by the Department on October 17, 2018.

On October 16, 2018, the Board of Supervisors authorized County staff to enter into a negotiation process to negotiate a possible development agreement with Stanford University relative to its GUP application. The Board also appointed two members of the Board to serve on an Ad Hoc Committee to provide guidance to County staff. The Board directed the Administration to report monthly to the Housing, Land Use, Environment, and Transportation (HLUET) Committee on the status of negotiations with Stanford University.

The Administration and County Counsel convened a negotiation preparatory meeting with the Board's appointed Ad Hoc Committee on November 5, 2018. At that meeting, the Ad Hoc Committee considered a proposal by Stanford University with respect to a proposed process and schedule for negotiations. The Ad Hoc Committee and County Administration met with Stanford University officials on November 30, 2018 to develop ground rules for the negotiations, which were approved by both parties on February 1, 2019 and expired on April 15, 2019. The process was structured with the hope of having a draft term sheet available for the Board to consider in the first half of 2019. On November 29, 2018, the County also held a public workshop to inform the public of the development agreement process and receive input on various community interests.

On April 16, 2019, the Ad Hoc Committee suspended the development agreement negotiations with Stanford as a result of the University reaching a tentative agreement with the Palo Alto Unified School District (PAUSD) for school benefits. The tentative agreement between Stanford and PAUSD was conditioned on approval of a development agreement between the County and Stanford. On May 10, 2019, the University suspended its actions on the agreement with PAUSD.

While there have been communications between the County and the University about the terms in which DA negotiations may resume, at the time of the preparation of this report,

there is not currently a plan to resume negotiations. Therefore, the Administration recommends at this time that the Planning Commission forward a recommendation to the Board to deny Stanford's application for a development agreement. If, in the future, negotiations result in a proposed development agreement, the County Administration would present it to the Planning Commission at a hearing.

E. Water Supply Assessment

Senate Bill 610 (SB 610) requires the preparation of a Water Supply Assessment (WSA) for certain large-scale development projects, such as the subject Stanford project, that require an EIR. The WSA is required to include a discussion of whether the total projected water supplies, determined to be available for the project during normal, single dry, and multiple dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project. Since there is no "public water system" serving the Stanford campus, the County, as the CEQA Lead Agency for the project Environmental Impact Report (EIR), is the approving jurisdiction for WSAs for the proposed project and Housing Alternatives A and B.⁴ The WSAs were prepared by Stanford University and its consultant, peer reviewed by the County's consultant, and were determined by the County to adequately assess water supply availability. The WSAs are located in the Appendices to the EIR (Appendix WSA and ALT WSA) and are included as **Attachment G**.

II. DEPARTMENT RECOMMENDATIONS – COMMUNITY PLAN

The Department recommends that the Commission first consider the Department's recommended amendments to the Stanford Community Plan as they provide a policy foundation for the review of Stanford's GUP Application. Subsequently, the staff report describes the recommended conditions of approval to be applied to the GUP, based on conformance with the General Plan, Community Plan, County Ordinances, and the Use Permit findings that must be made by the Board to approve the GUP application. Reasons for the Department's recommendations concerning Stanford's proposed amendments to the Community Plan and Zoning Ordinance, the Development Agreement, and Water Supply Assessment, are also described.

⁴ WSAs are a part of the full environmental analysis prepared for Alternatives A and B in order to identify the implications of constructing additional on-campus housing.

Department’s Recommended Community Plan Amendments

The Department is recommending the County update and amend the Stanford Community Plan in several areas, including (a) updating background text and figures to reflect current information, and (b) updating policies, and implementation measures to reflect current conditions. Following is a summary of amendments proposed by the Department. The full text of the SCP is included in **Attachment C** and a summary is provided below in **Table 9**. The findings to support the SCP amendments are set forth in **Attachment E**.

The Community Plan amendments identify a maximum development build-out for Stanford, consistent with the principles of General Plan growth modeling and the consistent with the square footage applied for by Stanford and evaluated in the EIR. Finally, the amendments incorporate applicable policies from the County’s adopted 2015 Health Element, addressing Social and Behavioral Health and Climate Change/Adaptation.

Table 9. Summary of Stanford University Community Plan Amendments

Growth and Development	
Maximum Development	<p><u>Context</u>: Development proposed by the GUP Application exceeds the 17.3 million square-foot limit established by the SCP (adopted SCP-GD 2).</p> <p><u>Proposed Amendments</u>: Establish a new development cap of 20.4 million square feet of academic/academic support development and student housing.</p>
Academic Growth Boundary	<p><u>Context</u>: The adopted SCP establishes the Academic Growth Boundary (AGB) in its current location for a minimum of 25 years (until 2025) and until development levels reach 17.3 million square feet. It specifies that any decision to amend the AGB requires a 4/5 vote of the Board of Supervisors (adopted SCP-GD 3). Stanford is expected to reach the square footage threshold by approximately 2023.</p> <p><u>Proposed Amendments</u>: Extend the duration of the AGB for 99 years (until 2118), retain the 4/5 vote requirement for amendments to the AGB, identify specific factors that would need to be considered prior to any future decision to change the location of the AGB (proposed SCP-GD 3)</p>
Land Use	
Public School Site Designation	<p><u>Proposed Amendments</u>: Add policy acknowledging that identified potential future school site may be relocated to a different location if warranted by future development patterns (SCP-LU 23)</p>
Alignment of Zoning and	<p><u>Proposed Amendments</u>: Add policy language that the County should periodically evaluate zoning designations to ensure that</p>

<p>SCP Designations</p>	<p>they conform and are consistent with SCP policies and land use designations (proposed SCP-LU 4) and specifically for evaluation of the A-1 District (proposed SCP-LU (i)1) and the Campus Residential-Low Density areas within the San Juan District (proposed SCP-LU (i) 2) to determine if they are appropriately implementing SCP objectives, and to create a new Campus Open Space Zoning District and apply it to areas designated Campus Open Space on the Land Use Plan (proposed SCP-LU (i) 3).</p>
<p>Housing</p>	
<p>Housing/Jobs Housing Balance</p>	<p><u>Context</u>: Current SCP policies call for housing types and supply adequate to meet the needs of Stanford faculty, staff, students, postgraduate fellows and medical interns (adopted SCP-H 1), including affordable housing (adopted SCP-H 6); recognize the connection between expansion of academic facilities and the increase in housing demand and the immediate need for additional on-campus housing (adopted SCP-H 5); and require that new housing development occur commensurate with academic development approvals (adopted SCP-H 7). <u>Proposed Amendments</u>: Add policy language that requires that affordable housing be provided at all affordable income categories documented (proposed SCP-H 6); clarify that housing requirements apply to “other workers” as well as faculty and staff.</p>
<p>Health and Safety</p>	
<p>Social and Environmental Health Climate Change and Adaptation</p>	<p><u>Context</u>: In 2015, the Board of Supervisors adopted a new General Plan Health Element. <u>Proposed Amendments</u>: Incorporate the County’s Health Element addressing social and environmental health and climate change into the SCP for ease of reference.</p>

Housing to Address Demand from Academic Development

The proposed amendments to the Community Plan addressing housing are needed to address vital housing supply and affordability issues that are most acute in the communities surrounding the Stanford campus. During the continued economic expansion that has occurred since the Great Recession ended in 2010, the Bay Area has added 722,000 jobs, but constructed only 106,000 housing units, exacerbating a long-term imbalance between jobs and housing. Furthermore, from 2010 to 2019, the population of Santa Clara County increased 9.7% (from 1,781,642 to 1,954,286), but the number of housing units only increased 6.25% (from 631,920 to 671,439). This imbalance significantly impacts housing availability and affordability.

Because of the shortage of affordable housing units in Santa Clara County, many households overpay for housing. According to the 2015-2023 Regional Housing Needs Allocation (RHNA) determined by the Association of Bay Area Governments, Santa Clara County had a total housing need of 58,836 units through 2023, which included the need to add 10,636 new Moderate Income, 9,542 new Low-Income units, and 16,158 Very Low-Income units within Santa Clara County. Although the current RHNA cycle is more than halfway over, only 48% of the allocated units across all income levels have been completed countywide. The percentage of allocated units countywide that have been completed are progressively worse the lower the income level: 23% of moderate-income units completed to date; 13% of low-income units; and 10% of very low-income units.

The Harvard Joint Center for Housing Studies found that only 22.3% of all households in the San Jose-Sunnyvale-Santa Clara metropolitan area (which includes the City of Palo Alto and Stanford University) could afford the typical monthly payments for a median-priced home. According to the National Low-Income Housing Coalition's Out of Reach 2018 study, the San Jose-Sunnyvale-Santa Clara HUD Metropolitan Fair Market Rent Area is the second most expensive metropolitan rental market in the United States. As result, tens of thousands of people in Santa Clara County are ill-housed or homeless. The severe housing shortage in the Bay Area has reached crisis proportions.

The housing supply and affordability concerns in Santa Clara County are the most acute around Stanford University due to the high housing prices in the area and the employment opportunities generated by Stanford. As documented in the County's Affordable Housing Nexus Studies, both development of academic space and new residential units on the Stanford Campus directly and indirectly create new jobs, including service workers who require affordable housing. Because affordable housing is in short supply in the Stanford Community Plan Area and environs, these workers are forced to pay a disproportionate share of their incomes for housing, live in substandard housing conditions, or commute long distances to the Stanford area from more affordable areas outside of the region.

Reasons for Community Plan Recommendations

1. The recommended amendments extend the horizon of the Stanford University Community Plan to ensure that it continues to provide long-range General Plan guidance for Stanford lands in unincorporated Santa Clara County and increase the academic development cap (academic and student housing development) from 17.3 million to 20.4 million square feet to allow for the additional 3.5 million square feet of academic space/student beds pursuant to the recommended General Use Permit.
2. The recommended extension of the term of the Academic Growth Boundary (AGB) for an additional 99 years is consistent with the conclusions of the 2018 Sustainable Development Study Supplement, which indicate that the campus area within the AGB

could support up to 44 million square feet of total development over a period of 100 years or more, almost three times the level of development existing at the time of the Study.

3. The recommended housing amendments support existing General Plan policy which specifies that planning for supply and diversity of housing in the urbanized areas of the county should provide for existing and expected employment and household needs and a diversity of affordability that matches the diversity of household incomes (Policy HG-1); and calls for reduction in the separation between housing and employment by strategic location of housing, including location of increased housing density along transit corridors and provision of on-site housing for employment centers (C-GD 39).

III. DEPARTMENT RECOMMENDATIONS - GENERAL USE PERMIT

The Department recommends that the Board of Supervisors approve the proposed General Use Permit for Stanford University, subject to the Conditions of Approval prepared by the Department. The Conditions of Approval are intended to implement the Stanford Community Plan policies and minimize the potential socio-economic and environmental impacts from the development of 3.5 million square feet of new building area as proposed under the Stanford GUP. The Conditions of Approval are included as **Attachment F**. The findings to support the Conditions of Approval are set forth in **Attachment E**. The main areas addressed by the Conditions of Approval include:

- A. Overall Development
- B. Phased Academic Development
- C. Housing and Affordable Housing
- D. Traffic and Transportation
- E. Vehicle Parking
- F. Other Recommended Requirements

A. Overall Development

The recommended Conditions of Approval establish the requirements for the carry-over of development authorized under the 2000 GUP (but not yet constructed) if implemented within three (3) years of the GUP's effective date; provide for construction of net new academic, housing, and associated development distributed by specific development districts, and establish the new GUP as a program-level document that sets forth a framework for development but requires additional discretionary land use approvals prior to development.

Carry-over development identified in the Conditions of Approval (Condition A.3) includes 182,920 square feet of academic and academic support space and 3,638 square feet of new childcare or community center space. The GUP also carries over 1,540 square feet of building area authorized by the 2000 GUP for the Foothills Development District. These square footage amounts may continue to decrease during the County’s consideration of the GUP and new projects are applied for by Stanford under the current 2000 GUP. The carry-over development would be allowed in addition to the development authorized by this GUP if it is constructed within three years of GUP approval. After three years from GUP approval, any remaining carry-over development would be deducted from the amount authorized by this GUP (Condition A.3).

Net new development addressed in the recommended Conditions of Approval is identified in **Table 10**. The 2,275,000 square feet of academic development, 40,000 square feet of childcare/trip reducing uses, and 50,000 square feet of construction surge space are as proposed by Stanford in the GUP Application. In order to implement the SCP Housing Linkage Policy, the minimum required 2,172 housing units/2,600 student beds exceeds that proposed in the GUP Application (550 units and 2,600 beds). Further discussion of housing requirements is included in the housing section below.

Table 10. Recommended Net New Development

Development Type	Minimum Required	Maximum Allowed
Academic/Support	N/A	2,275,000 sf
Housing Units	2,172 units	2,892 units
Student Beds	2,600 beds	2,807 beds
Childcare/Trip Reducing Facilities	N/A	40,000 sf
Construction Surge Space	N/A	50,000 sf at any one time

The Conditions of Approval distribute net new development by development district based on recommended boundaries shown in **Figure 7 of Attachment J**. These development district boundaries include Stanford’s proposed boundary adjustments (between the San Juan and Campus Center Districts, and the Campus Center and DAPER and Administrative Districts) and an additional adjustment recommended by the Department which expands the Arboretum District to incorporate all of the contiguous land designated Campus Open Space on the Community Plan land use designation maps. (See further discussion below.)

Table 11 shows the proposed distribution of academic and housing development. In the West Campus, Lagunita, Campus Center, Quarry, DAPER & Administrative, and East Campus districts, academic development may be increased by 20% over the amount identified in **Table 11** or by 20,000 square feet, whichever is less. Any greater redistribution of square footage requires additional environmental analysis and authorization by the Planning Commission. Any redistribution of development resulting in an increase in one development district must be offset by an equivalent decrease in another district (Condition B.3). No development is allowed in the Arboretum District. Housing distribution requirements are discussed in the housing section below.

Table 11. Distribution of Development

Development District	Acres	Maximum Academic Development (sq. ft.)	Proposed Housing 550 Units 2,600 Beds	Minimum Housing Required 2,172 Units 2,600 Beds	Max. Housing Allowed 2,892 units 2,807 beds
Quarry	25	200,000	550	914	1,100
Arboretum	186	0	0	0	0
DAPER & Administrative	164	200,000	0	554	666
Campus Center	361	1,800,000	200	200	200
East Campus	234	20,000	1,600	1,885	2,267
West Campus	89	35,000	0	554	666
Lagunita	183	0	800	665	800
Lathrop	36	20,000	0	0	0
San Juan	446	0	0	0	0
Foothills	2,293	0	0	0	0
TOTALS	4,017	2,275,000	3,150	4,772	5,699

Reasons for Development Recommendations (GUP)

1. The recommended Conditions of Approval governing overall development of academic space and housing provide for a mix and distribution of uses that is consistent with the policies and land use designations of the Stanford University Community Plan.

2. Development authorized by this GUP, including 2,275,000 net new square feet of academic development and 1,225,000 net new square feet of student housing (2,807 beds) (Condition B.1) totaling 3,500,000 square feet, is consistent with the maximum 20,400,000 square feet of academic and student housing development that the amended Stanford Community Plan (SCP) identifies for the site.

B. Phased Academic Development

Due to the duration of the GUP and the importance of periodically assessing conformance with project requirements, Condition B.2 establishes a formal review of Stanford's compliance with the Conditions of Approval at intervals of five (5) years or more by the Planning Commission. Under this formal review, if the Planning Commission determines that Stanford is not complying with its Conditions of Approval, Stanford will not be able to continue the next phase of academic development as proposed under the GUP. Each phase consists of 25% (up to 568,750 sf) of the total 2,275,000 square feet of academic development and academic support space and would extend for a minimum period of five years (**Table 12**).

The first review by the Planning Commission would occur no sooner than five years after the effective date of the GUP or at the end of development of the first 25% of total academic space (up to 568,750 sf).

The Planning Commission must hold a public hearing and make the following findings (Condition B.2):

1. Stanford University and all development pursuant to this GUP is in full compliance with all conditions of approval and mitigation measures of this GUP.
2. Stanford University and all development within the Stanford University Community Plan area that was authorized by the County pursuant to permits and approvals other than this GUP is in full compliance with all conditions of approval and mitigation measures applicable to that development.
3. Stanford has achieved the No Net New Commute Trips (NNNCT) standard with respect to peak hour and peak period trips in the commute direction for each year in the prior Phase. (See Condition F.2.a).
4. Prior to Phase 2, 3, and 4, Stanford development under this GUP has not resulted in a 2% or greater increase in reverse commute trips in any two (2) years within the prior Phase. (See Condition F.2.b).

5. Prior to Phases 3 and 4, Stanford development under this GUP has not resulted in a 3% or greater increase in Average Daily Trips in any two (2) years within the prior Phase. (See Condition F.2.c)
6. Stanford is in compliance with the Housing Linkage requirements. (See Condition C.7)

If the Planning Commission makes the findings listed above, the GUP would proceed into its next phase of development. This formal review by the Planning Commission would occur at the end of Phases 1, 2 and 3.

Table 12. Phasing of Academic Development

Academic Development Phase	Earliest Date Authorization May Occur	Maximum Allowable Increment of Academic Development (s.f.)
Phase 1	Effective date of this GUP	up to 568,750
Phase 2	5 years after effective date of this GUP	up to 1,137,500
Phase 3	10 years after effective date of this GUP	up to 1,706,250
Phase 4	15 years after effective date of this GUP	up to 2,275,000

Reasons for Phased Academic Development Recommendations (GUP)

1. Phased authorization to draw down square footage for academic development allows for full implementation of the development proposed by Stanford while simultaneously providing a mechanism to ensure that Stanford is in conformance with all Conditions of Approval, including housing and transportation requirements, as the GUP is implemented.
2. The required findings for authorization to draw down a subsequent development phase provide accountability for the ongoing development under the GUP.

C. Housing and Affordable Housing

The well documented jobs-housing imbalance and severe shortage of housing and affordable housing in Santa Clara County is particularly acute in the area around Stanford University due to high housing prices in the area and employment opportunities generated by Stanford and the surrounding high technology companies. Stanford’s proposed development of

3,500,000 square feet of academic space/student beds and 550 faculty/staff housing units has the potential to exacerbate the existing housing shortage by substantially increasing housing demand and not providing the commensurate level of housing needed. In addition, the new employees not eligible for the 550 faculty and staff housing units will be required to either drive long distances or displace other persons demanding housing in and around the Stanford community.

The Stanford GUP Application estimates that buildout of the academic space would add 5,556 employees (2,438 staff, 789 faculty, 961 postdoctoral scholars, 57 janitors, 72 third-party contract workers, 966 casual and temporary workers and 273 contingent workers). In response to comments submitted on the Draft Environmental Impact Report on the environmental impacts associated with the increase in the employees at Stanford and traffic impacts, the County prepared an Alternative to the Draft Environmental Impact Report evaluating the environmental impacts of full housing.

The Affordable Housing Nexus Analysis Addendum for Stanford University Campus prepared for the County in April 2018 by Keyser Marston Associates (KMA), estimates the housing demand associated with the additional workforce created by Stanford's new academic space and new residential development. For academic space, the affordable housing demand is associated with workers who work within or provide support services to the new academic space uses. For new residential development of faculty and staff housing, the affordable housing demand is associated with the workforce that provides services to residents.

The Nexus Analysis Addendum indicates the proposed GUP development would result in 4,010⁵ net new workers and a demand for 2,172 new housing units, including 964 housing units affordable to workers with incomes between 0% and 120% of the Area Median Income (AMI) (**Table 13**).

⁵ The KMA Nexus Analysis adjusted the number of workers identified by Stanford to reflect part-time workers (i.e. less than 50% of a Full Time Equivalent).

Table 13. Housing Demand

Housing Category	Number Units
Market Rate Housing	1,208
Below Market Rate Housing	
• Moderate Income	389
• Low Income	429
• Very Low Income	108
• Extremely Low Income	38
Subtotal	964*
Total Units	2,172

* The total number of Below Market Rate Units as identified in the Nexus Study was adjusted downward to 933 to account for overlap between the Housing Impact Mitigation Fee Ordinance and the Inclusionary Housing Ordinance.

In September 2018, the Board of Supervisors adopted the Housing Impact Mitigation Fee Ordinance and the Inclusionary Housing Ordinance to mitigate for future impacts on affordable housing within the Stanford Community Plan area. The Ordinances were based on the affordable housing needs identified by the Affordable Housing Nexus Analysis Addendum (Nexus Addendum). The Housing Impact Mitigation Fee Ordinance establishes a mitigation fee of \$36.22 per square foot of academic development in the first year and a \$68.50 fee in the second year and thereafter.

The initial first-year \$36.22 mitigation fee is the same as the current 2000 GUP in-lieu affordable housing fee, which is tied to the City of Palo Alto Housing Mitigation Fee (previously referenced as the Below Market Rate fee). The ordinance allows an applicant, including Stanford, to obtain fee credit if the applicant chooses to construct affordable units, based on the fee rate in effect at the time. After the first year, the \$68.50 fee would mitigate approximately 60% of the affordable housing demand generated from future development of academic space within the Stanford Community Plan area.

The Inclusionary Housing Zoning Ordinance requires 16% of all market rate housing units constructed within the Community Plan Area to be below market-rate. For rental units, 15% must be affordable to low or very low-income households, 45% to low-income households, and 40% to moderate income households. For sale units must be affordable to moderate income households. The two ordinances are operative on July 1, 2019 and will apply to Stanford development under the proposed GUP.

Housing and Affordable Housing Recommendations

The Conditions of Approval require Stanford to provide housing sufficient to address 100% of the housing demand resulting from implementation of the proposed development.

Following is an overview of the recommended housing requirements:

1. Amount of Housing. Require Stanford to provide housing units and student beds in conformance with **Table 14**. The total required housing units, 1,239 market-rate and inclusionary units and 933 below-market rate units, reflects the estimated demand from the Nexus Analysis Addendum. The number of below market-rate units has been adjusted downward slightly to eliminate overlap in demand associated with the inclusionary ordinance and the academic space affordable housing mitigation impact fee.
2. The total 2,172 required housing units significantly exceeds the maximum of 550 units proposed by Stanford in the 2018 GUP Application. The required 2,600 student beds amounts to the same figure as requested in the GUP Application. The maximum 2,892 allowed housing units and 2,807 beds (1,225,000 square feet) is based on the development assumptions for Housing Alternative A, which was fully addressed in Environmental Impact Report.

Table 14. Housing Requirements

Faculty/Staff Housing Units	Minimum Required	Maximum Allowed	Housing Location
Market-Rate and 16% Inclusionary Units	1,239 ⁶	1,959	Construct a minimum of 70% of all units, by category, on campus.
Below Market-Rate Units By Income Category			
<i>Moderate Income</i>	347	N/A	A minimum of 70% of constructed units shall be located on campus.
<i>Low Income</i>	381	N/A	
<i>Very Low Income</i>	133	N/A	
<i>Extremely Low Income</i>	72	N/A	
Below Market-Rate Units All Income Categories	933	N/A	
Subtotal	2,172	2,892	
Student Housing			
Student Beds	2,600	2,807	Construct 100% of all student beds on-campus
TOTALS	4,772	5,699	

3. Housing Impact Mitigation Fee Ordinance. In compliance with the ordinance, require Stanford to pay mitigation fees or receive fee credit for construction of deed-restricted (for a minimum of 55 years) below market-rate units based on fee rates in effect at that time. Because the current mitigation fees address 60% of the affordable housing demand, such fees could be used to provide not more than 60% of the required below market-rate units.

4. Inclusionary Housing Ordinance. In compliance with the ordinance, require Stanford to construct 16% of the required market rate units as deed restricted (for a minimum of 55 years) inclusionary units that meet the specified affordability

⁶ Based on the 16% requirement, 198 of these units would be inclusionary, deed-restricted below-market rate housing units.

requirements. Construction of these units is in addition to, and would not be credited towards the 933 required below market rate units, by income category.

5. Housing Linkage. Require Stanford to provide housing concurrent with construction of new academic facilities based on the linkage benchmarks identified in Table 15. Assess conformance with the linkage requirement for Phases 1 to 3 prior to authorization of the next phase of academic development. In Phase 4, enforce annually provision of one net new faculty/staff housing unit for each 1,047 square feet of academic development and one net new student bed for each 875 square feet of academic development.

Table 15. Required Housing by Increments of Academic Development

Phase Academic Development (S.F.)	% of Housing Required per Phase		Market-Rate and Inclusionary Units Required	Below Market-Rate Units Required	Total Units Required	Student Beds Required
<u>Phase 1</u> Up to 568,750	25%	<i>Net Increase</i>	310	233	543	650
		Sub-Total	310	233	543	650
<u>Phase 2</u> Up to 1,137,500	50%	<i>Net Increase</i>	310	233	543	650
		Sub-Total	620	466	1,086	1,300
<u>Phase 3</u> Up to 1,706,250	75%	<i>Net Increase</i>	310	233	543	650
		Sub-Total	930	699	1,629	1,950
<u>Phase 4</u> Up to 2,275,000	100%	<i>Net Increase</i>	309	234	543	650
		TOTALS	1,239	933	2,172	2,600

5. Housing Location. Require Stanford to provide all student beds and a minimum of 70% of constructed housing units on the campus (see **Table 14**). Allow a maximum of 30% of constructed housing units, by income category, to be developed off campus, within a six-mile radius of the area subject to the Stanford Community Plan. Allow the Planning Commission to grant an exception to this requirement if the Commission finds that it is infeasible to develop the required housing within the 6-mile radius due to lack of adequate housing sites. Require any housing authorized outside the six-mile radius to be located in Santa Clara County, within 2,000 feet of a major transit stop, and require Stanford to

demonstrate compliance with the California Environmental Quality Act for the proposed off-campus housing.

6. Housing Distribution by Development District. The recommended Conditions of Approval (see Table 11) identify the minimum required and maximum allowed housing within each Development District compared to the distribution of housing units/beds proposed by Stanford. In all development districts, the amount of housing may exceed the proposed distribution by 20% of the maximum number of units or 200 units, whichever is less, based on an equivalent reduction in another development district. In a district where no proposed distribution is identified, the maximum number of units allowed to be redistributed is 20. Any greater change requires authorization by the Planning Commission and additional environmental analysis. No housing is allowed in the Foothills, Lathrop or Arboretum Districts. Most of the additional required housing is distributed to the Quarry, DAPER and Administrative, East Campus and West Campus Development Districts. **Figure 8 of Attachment J** illustrates how the required housing could be accommodated within these Districts.

Reasons for the Housing Recommendations (GUP)

1. The recommended GUP housing requirements are consistent with General Plan policies which specify that planning for supply and diversity of housing in the urbanized areas of the county should provide for existing and expected employment and household needs and a diversity of affordability that matches the diversity of household incomes (Policy HG-1); and call for reduction in the separation between housing and employment by strategic location of housing, including location of increased housing density along transit corridors and provision of on-site housing for employment centers (C-GD 39).
2. The recommended housing requirements are consistent with SCP policies that acknowledge the connection between expansion of academic facilities and the resultant increase in housing demand (adopted SCP-H 5); call for provision of a variety of housing types and supply adequate to meet the needs of faculty, staff, students, postgraduate fellows, hospital residents and other workers (adopted SCP-H 1 and proposed SCP-H 1); specify that through the General Use Permit, the County should permit development of additional on-campus housing, including housing for designated extremely low-, very low-, low- and moderate-income persons, including faculty, staff, other workers, students, postgraduate fellows, and hospital residents (adopted SCP-H 6 and proposed SCP-H 6).
3. The required full mitigation of the housing demand generated by the proposed development will avoid exacerbating the existing jobs-housing imbalance and resulting affordable housing crisis in the county and region.
4. The required on-campus housing will reduce commute trips that would otherwise be associated with Stanford's proposed development, and the location of this housing in

proximity to the Palo Alto Intermodal Transit Center will provide non-automobile travel options during the commute and non-commute hours for Stanford residents, including household members of Stanford affiliates who commute to off-campus jobs.

5. Based on the Sustainable Development Study Supplement, the 1,028-acre Academic Campus area can accommodate significant additional academic and student housing development beyond that proposed in this GUP Application, 44 million square feet – almost three times the development existing on the campus as the time of the study. This is significantly more development than allowed on the Stanford campus by the 2000 GUP. As conditioned, the proposed GUP allows a maximum of 20,400,000 square feet of academic development and student beds, and assuming that all housing units are built on the campus, a maximum of approximately 4,338,000 square feet of new faculty and staff housing⁷ (2,892 units) resulting in total net new development of 24,738,000 square feet.
6. The Environmental Impact Report (EIR)⁸ analyses of the Proposed Project and Housing Alternative A fully address the environmental impacts of locating all or a portion of the maximum recommended 5,699 unit/beds on the Stanford campus, in conformance with CEQA. The EIR analyzes the impacts of Alternative A based on the assumption that all 5,699 units/beds would be constructed on the Stanford campus with the option of Stanford providing the units off-campus if approved by the County. In addition, the EIR analysis of the Proposed Project indicates the traffic and transportation-related air quality impacts of locating only a portion of the housing on the campus. This analysis assumes construction of 550 housing units on the campus and that Stanford affiliates not housed on the campus would commute to the campus from housing in other locations determined based on commute information provided in Stanford’s Annual Commute Survey. The EIR concludes in regard to both the Proposed Project and Alternative A, that construction of off-site housing would result in significant and unavoidable environmental impacts.

D. Traffic and Transportation

Since adoption of the 2000 GUP, the No Net New Commute Trips standard has been the framework for addressing traffic associated with new development on the Stanford campus. Compliance with the standard is assessed annually by monitoring peak hour, commute direction traffic (i.e., traffic entering the campus in the morning and leaving in the evening) at gateway intersections along a cordon. The threshold for lack of conformance with the standard is an increase in total traffic levels at the gateway intersections of 1% or more as compared to the baseline established in 2001.⁹ Stanford may reduce monitoring counts that exceed the baseline through application of trip reduction credits awarded by the County

⁷ The housing square footage assumes an average of 1,500 square feet per unit.

⁸ https://www.sccgov.org/sites/dpd/programs/stanford/pages/gup2018_ceqa.aspx

⁹ For example, the baseline established in 2001 for total commute trips to the campus passing through the cordon gateways in the AM peak hour is 3,439 trips. An increase of 1% or more (i.e., 35 trips or more) would constitute a violation of the standard.

based on Stanford's contribution to efforts in the surrounding area that result in trip reduction.¹⁰

The EIR identifies the no net new commute standard as the first-line mitigation for the project's traffic impacts. If Stanford is not successful in achieving No Net New Commute Trips, alternative mitigation in the EIR requires the University to make fair-share payments to partially fund mitigation improvements identified in the EIR that would mitigate traffic impacts.

While the EIR identifies that neither of these mitigations is sufficient to mitigate the traffic impacts, which remain significant and unavoidable, previous Transportation Demand Management programs implemented by Stanford to achieve the No Net New Commute Trips standard have been very effective in reducing peak hour commute trips in the commute direction. As traffic has increased over time in the area around Stanford University, there is growing concern that focusing only on traffic in the peak direction during one hour in the morning and one hour in the evening is not sufficient, and that additional controls are needed for the reverse commute direction and for non-commute hours. Additionally, the findings for the General Use Permit require a showing that the project "will not substantially worsen traffic congestion affecting the surrounding area" and, thus, impose an additional heightened standard above the requirements of CEQA.

Traffic and Transportation Requirements

In order to ensure that Stanford development does "not substantially worsen traffic congestion affecting the surrounding area" (a required finding for approval of this GUP), the Department recommends Conditions of Approval that retain the No Net New Commute Trips standard, establish new trip reduction and monitoring requirements, and withhold additional phases of development until Stanford is able to meet the standard. Following is an overview of the recommended traffic conditions.

1. No Net New Commute Trips – Peak Hour and Peak Period. Require Stanford to achieve the **No Net New Commute Trips** standard during both the AM and PM peak hours and peak periods (i.e., avoid exceeding the commute direction peak hour and peak period baselines (established in 2001) by 1% or greater in any year). The peak hours consist of the one-hour period in the morning and the one-hour period in the evening with the highest traffic volume. The peak periods consist of the three-hour

¹⁰ For example, if Stanford funds a trip reduction project in Palo Alto, and can demonstrate that the project would reduce 10 peak hour trips, the County could award Stanford 10 peak hour trip reduction credits and those credits could be used to reduce peak hour trip exceedances.

period in the morning and the three-hour period in the evening with the highest traffic volume. Violation of these standards results in the following:

- If the standard for either the AM or PM peak hours or peak periods is violated in any one (1) year, the County will suspend approval of new development, pursuant to the public process in Condition A.11, until Stanford demonstrates compliance a minimum of one (1) year preceding authorization of the next development phase (Condition F.2.a.3).
- If the standard for either the AM or PM peak hours or peak periods is violated in two (2) or more years during a development phase, no subsequent development phase will be authorized until Stanford demonstrates compliance with the standard a minimum of one year preceding authorization of the next development phase (Conditions F.2.a.3 and F.5.b).
- If the standard identified for the AM and PM peak hours is violated in any one (1) year, Stanford is required to make fair share payments to mitigate its impacts to off-campus roadways and intersections as required by Mitigation Measure 5.15-2(a)(6) (Condition F.5).

2. No Net New Commute Trips – Reverse Commute. Require Stanford to use its best efforts to achieve no net increase in reverse commute trips during the peak hours and peak periods. Upon authorization of Phase 2 and thereafter, there shall be no net increase in **reverse commute** trips during the peak hour or peak period (i.e., avoid exceeding the reverse commute direction peak hour or peak period baselines by 2% or greater in any two (2) consecutive years after this standard takes effect). The baselines will be established by the County before authorization of any Phase 2 development (Condition F.2.b, Condition F.1.m, and Condition F.1.q.) If the standard is violated, the consequences are as follows:

- If any of the reverse commute trip peak hour or peak period standards that commence upon authorization of any Phase 2 or Phase 3 development are violated in any one (1) year, the County shall immediately suspend approval of any new development projects pursuant to the process in Condition A.11 until Stanford demonstrates compliance a minimum of one (1) year preceding authorization of the next development phase (Condition F.2.b.3).
- If any of the reverse commute trip peak hour or peak period standards are violated in two (2) or more years during Phase 2 or Phase 3 (see Condition B.2), the next development phase shall not be authorized until Stanford demonstrates compliance with the standard(s) for, at a minimum, one (1) year preceding authorization of the next development phase through subsequent annual traffic counts (Condition F.2.b.3).

3. Average Daily Trips. Require Stanford to implement all feasible measures to achieve no net new increase in **Average Daily Trips** (ADT). Upon authorization of any Phase 2 development and thereafter, there shall be no net increase in ADT (i.e., avoid exceeding the baseline by 3% or greater in two (2) consecutive years during a development phase). If this standard is violated, the consequences are as follows:
 - The County will not authorize the next development phase until Stanford demonstrates compliance with the standard for a minimum of one (1) year preceding authorization of the next development phase through subsequent annual traffic counts (Condition F.2.c.3).
4. Traffic Monitoring and Annual Report Requirements. The Conditions establish methods for conducting independent and verifiable annual traffic counts to determine compliance with the GUP's traffic standards (Condition F.3). The Conditions also establish regulations for the County's granting of trip credits as a result of Stanford's funding programs or off-campus improvements that shift travelers away from motor vehicles (Condition F.4). They include requirements for disclosure in the Annual Monitoring Report of annual traffic monitoring information regarding compliance with the traffic standards of this GUP, and information regarding trips credits granted and used (Condition F.6).
5. Safe Routes to School. Based on Stanford's offer in the GUP Application, the Conditions require Stanford to make on-campus safe routes to school improvements near Nixon and Escondido Elementary Schools (Condition F.7). In addition, if a new school is required or school attendance boundaries are changed to accommodate the increase in Stanford K-12 students, the Conditions require Stanford to make fair-share contributions to fund safe routes to school studies and improvements (Condition F.8).
6. Special Events. The Conditions of Approval require that Stanford prepare a Special Events Management Plan that addresses traffic control, obtain a Special Events Permit for any event with an attendance of 10,000 or more, notify surrounding cities regarding special events, and notify the public via newspaper advertisement, telephone hotline, publicly accessible website, and opt-in email and text notices (Conditions G.2 and 3).

The recommended Conditions of Approval do not incorporate two of Stanford's requested traffic conditions:

- Automated Monitoring Equipment. The Conditions do not authorize automated monitoring equipment as proposed by Stanford. The decision regarding installation of such equipment is a technical one that would more appropriately be made by the

Department Director with advice from the County’s traffic consultant once Stanford has provided specific information regarding proposed equipment.

- Fair-Share Payment Calculation. The Conditions do not incorporate Stanford’s proposed fair-share mitigation payment calculation, which allows for less than the full fair-share intersection mitigation contribution. If Stanford does not meet the **no net new commute trips** standard, the Director will determine the schedule for payment of the full fair-share intersection mitigation contribution.

Reasons for Traffic Recommendations (GUP)

1. The recommended traffic requirements are consistent with existing and proposed Stanford Community Plan (SCP) circulation strategies and policies that call for Stanford to achieve no net new commute trips (Strategy #1); avoid worsening traffic congestion in the surrounding area; alleviate local traffic congestion (Strategy #2); reduce automobile dependency (adopted SCP-C 2); limit travel at non-commute times, and in the non-commute direction (adopted SCP-C 7).
2. The traffic Conditions of Approval supplement the traffic mitigation identified in the EIR to ensure that the project “will not substantially worsen traffic congestion affecting the surrounding area,” consistent with the required use permit findings.
3. The recommended Conditions of Approval establish traffic standards, independent and verifiable traffic monitoring, and clear consequences for failure to meet standards to ensure that development under the proposed GUP does not substantially worsen traffic congestion affecting the surrounding area.
4. The recommended Conditions broaden trip reduction requirements to address traffic throughout the day and in off-peak directions, including traffic associated with non-work-related trips and residents commuting to off-campus jobs.
5. The recommended No Net New Commute Trips requirement and other trip reduction standards promote alternative modes of travel, which reduce traffic congestion and air emissions and offer community health benefits.
6. The recommended provision for trip reduction credits encourages Stanford to continue to fund trip reduction efforts in the area surrounding the campus.

E. Vehicle Parking

The 2000 GUP established a parking cap of 21,651. The Stanford GUP Application estimates that after completion of development authorized by the 2000 GUP, Stanford will have constructed 820 net new parking spaces, leaving 1,480 spaces not yet implemented.

Based on 2015 parking ratios and a 15% vacancy factor, Stanford estimates it will need 3,480 spaces for the new GUP, and proposes to carry over the 1,480 remaining spaces into new GUP and add a 2,000 space parking reserve. Stanford also proposes that certain types of parking be exempt from counting towards the parking cap (i.e., trip reducing spaces, electronic vehicle charging station spaces, police and fire spaces, and spaces for high density housing), which would, in effect, further increase the parking cap.

The total number of active campus commuter and residential permits has declined from a high of nearly 21,000 permits sold in 2004-2005 to fewer than 18,000 sold in 2015-2016. During this timeframe, enrollment in the Commute Club has steadily increased, more than doubling since 2004-2005. These two trends reflect Stanford's development of a robust TDM program to contain traffic growth in response to the No Net New Commute Trips standard. Notably, permit sales declined, even as the square footage of the campus increased under the 2000 General Use Permit. Additional TDM measures that continue to reduce the drive-alone rate and associated parking ratios are needed for compliance with the trip reduction requirements of this GUP. Notably, the Fall 2015 Stanford parking inventory indicates that approximately 86% of campus spaces were occupied on a typical day when Stanford was in session.

Recommended Parking Requirements

The recommended parking requirements (Condition H.1) retain the 21,651-space parking cap, which allows for up to 1,480 net new parking spaces, but do not provide for a 2,000-space parking reserve. The recommended Conditions of Approval exclude the following types of parking from the parking count:

- Parking provided for residents in parking garages or structures associated with on-campus housing for faculty, staff, other workers, postgraduate fellows, and medical interns, up to a maximum of one space per unit;
- Parking restricted to buses (shuttle, tour, charter) and oversized vehicles and equipment; and
- Parking restricted to emergency vehicles (police, fire, ambulance).

The recommended Conditions do not exclude trip reduction or electric vehicle charging station spaces from the parking count.

The Conditions of Approval also require Stanford to provide fair-share funding for parking studies and residential permit parking programs as needed to ensure that spillover parking does not impact residential neighborhoods (Condition G.3).

Reasons for Parking Recommendations (GUP)

1. The recommended parking requirements are consistent with Stanford University Community Plan policy that calls for regulating parking supply as a mechanism for transportation demand management (TDM), while avoiding spillover of parking in neighborhoods (adopted SCP-C 6 and proposed SCP-C 6).
2. The parking cap of 21,651 spaces provides for moderate growth in on-campus parking that supports and is consistent with the proposed requirements for reduction of automobile trips.
3. Effective parking management tools, such as parking permit pricing, incentives for alternate modes of travel, and regulations governing undergraduates' ability to have on-campus cars, are available to encourage continued reductions in car ownership by students and other campus residents.
4. Stanford could make more efficient use of existing parking by allowing the parking occupancy rate to increase from 86 percent to 95 percent or higher, consistent with best management practices for long-term employee and resident parking. The vacant parking spaces constitute a significant parking reserve that could be activated if needed.
5. Residential permit parking has been implemented by the City of Palo Alto in areas around the Stanford campus to prevent spill-over parking from impacting residential neighborhoods. The recommended Conditions require Stanford to help fund additional permit parking programs if needed to prevent future parking impacts on residential neighborhoods.
6. The recommended requirement to count residential parking spaces in excess of one space per unit towards the parking cap provides an incentive for Stanford to minimize residential parking. Trip reducing parking spaces and electric vehicle charging station spaces are beneficial, but they still require parking spaces and do not necessarily reduce trips.

F. Other Recommended Requirements

Historic Resources

Planning staff received extensive comments over the course of four public meetings from the Historical Heritage Commission (HHC) and members of the public on the Stanford University Historic Resources Survey and related mitigation measures contained within the EIR. As a result, staff recommends that the Survey continue to be used as a programmatic level document for the EIR. The EIR is a program level EIR and, as such, allows for further analysis at the time specific projects are proposed.

Additionally, consistent with the County's Ordinance Code and SCP policies and implementation recommendations governing historic resources, staff is proposing Conditions of Approval for the GUP providing for additional historic evaluations, utilizing all four California Register criteria, for any structure that is 50-years or older and being considered for alteration or demolition.

The recommended Conditions of Approval (Condition N.2) require that:

- Any building over 50-years old will be subject to a historic evaluation, unless it has already been deemed eligible for the California Register based on prior analysis, is listed on the County Register, or is listed on the Survey as eligible.
- Buildings previously identified as ineligible must be revisited and reviewed by the County to confirm the ineligibility status based on the four criteria used for listing on the California Register.
- Architecture and Site Approval (ASA) applications including proposed demolition, relocation, or modification of buildings 50-years or older will be reviewed by the County for possible inclusion on the County's Heritage Resource Inventory.

With these recommended Conditions of Approval, the HHC advised adoption of the EIR.

Open Space

The recommended Conditions of Approval preserve existing open space lands outside the Academic Growth Boundary (AGB) and the associated viewsheds and natural resources by allocating academic and housing development to development districts located within the AGB and restricting development outside the AGB (Condition of Approval B.3). No new development is allowed in the Foothills Development District except for approximately 1,540 square feet of development carried over from the 2000 GUP (Condition A.3.c).

All development outside the AGB would be reviewed by County staff or the Planning Commission for conformance with the use regulations, new structure limitations, and requirements for protection of resources of the applicable SCA Special Conservation Area or OS/F Open Space and Field Research Zoning District (Condition A.5) and would need to conform to the Habitat Conservation Plan and associated conservation easements (California Tiger Salamander Reserve and Matadero/Deer easements) and 50-year no build areas (Condition J.11). The GUP prohibits new housing units within the Foothills District (Condition C.9.b).

The Department finds that the General Plan level land use designations, zoning regulations and GUP conditions of approval are sufficient to ensure the long-term protection and retention of the open space areas/Foothills of the Community Plan Area. While the zoning code (Chapter 5.45) does provide for permanent open space easements to be required for “clustered development” as defined by the code, this open space protection mechanism is focused mainly on rural residential subdivisions. This allows for the shifting of allowed densities on large properties and creates an appropriate mechanism for the land area that is used to allow for the overall development density in the clustered areas be protected as open space. The situation with Stanford lands is different in that there is no significant underlying General Plan or zoning designated development potential contained in the open space/Foothills area. This means that the clustering of development in exchange for permanent open space would not be appropriately applied with a zoning mechanism.

Tree, Oak Woodland and Sensitive Environmental Resources

The recommended Conditions of Approval incorporate measures (including the mitigation measures identified in the EIR) to protect trees, oak woodlands, and sensitive environmental resources.

The Conditions include requirements for County approval prior to removal of protected heritage trees, trees that are 12-inches or more in diameter (except those located in the R1S Zoning District), and trees located within a County right-of-way or easement and specify minimum tree replacement ratios (Condition J.1.b). The protection of trees 12-inches or more in diameter implements an existing Community Plan Implementation Recommendation.

The Conditions also include measures to protect native oak woodlands and provide for oak woodland replacement if removal is deemed necessary (Condition J.9).

The GUP includes conditions that identify setbacks and other measures to protect riparian areas (Condition J.8); jurisdictional waters and wetlands (Condition J.10); special status plant species (Condition J.6); and special status animal species – including migratory and other nesting birds (Condition J.3), bats (Condition J.4), dusty footed woodrats (Condition J.5), and steelhead (Condition J.7).

Compatible Design

The recommended Conditions require Architecture and Site Approval (ASA) for site-specific development projects in conformance with the Zoning Ordinance (Condition of Approval D.1). The purpose of ASA is to maintain the character and integrity of zoning districts by

promoting quality development in harmony with the surrounding area through consideration of all aspects of site configuration and design, augmenting the use permit process by providing a means for establishing detailed conditions on proposed developments.

El Camino Real Frontage Plan Update

Recommended Conditions of Approval provide for phased preparation of an updated El Camino Real Frontage Plan for Stanford lands along the south side of El Camino Real to identify setbacks, height limits, and other standards to guide the future location and design of development along the El Camino Real site frontage. No ASA will be granted for any development within 100 feet of El Camino Real until that phase of the El Camino Real Frontage Plan has been completed (Condition K.1). Housing development within the Quarry District may proceed under the existing El Camino Real Frontage Plan.

Municipal Services Study

The recommended Conditions of Approval require Stanford to fund a Municipal Services Study directed by the County to identify service levels and needs of Stanford students, residents, faculty, staff and visitors, and that provision of these services does not place a burden on surrounding jurisdictions. Municipal services include, but are not limited to: childcare services; senior nutrition and other senior services; police, fire and emergency medical services; integrated waste services; water services; animal control services; recreation services; library services; sanitary sewer services; public works; road improvements and maintenance; public transit services; healthcare services; mental health services; substance abuse treatment services; and services for persons with disabilities.

The Condition specifies that if Stanford is not providing adequate services, the County would require Stanford to provide these services directly or may consider a request to utilize an in-lieu fee payment to the County for an alternate provider to deliver the relevant services (Condition O.9).

Parks Study

The recommended Conditions require Stanford to fund a study directed by the County to identify how parks (designed for both active and passive recreation geared toward the specific needs of, and accessible to, residents of campus neighborhoods) will be provided to serve the proposed development and associated population that will be approved pursuant to this GUP. The study would identify minimum required park acreage, where new park facilities might be located, and an implementation schedule (Condition I.2).

Master Drainage Plan Update

The Conditions require Stanford to prepare, within 18 months of GUP approval, an updated Master Drainage Plan for review and approval by the County (in consultation with other regulatory agencies) and thereafter construct the drainage system consistent with the Plan and demonstrate that each development project complies with the Plan. The Plan must provide for a stormwater drainage system that:

- Mitigates all increased runoff generated by development from December 12, 2000 through the life of this GUP resulting from 10-, 20-, 50-, and 100-year storm events;
- Demonstrates that development within the Community Plan from December 12, 2000 through the life of this GUP will not increase peak flows and volumes; the frequency, severity, and lateral extent of flooding; and water surface elevations in San Francisquito Creek and Matadero Creek resulting from 10-, 20-, 50-, and 100-year storm events; and
- Is consistent with all applicable stormwater regulations.

The Plan will include an implementation schedule for construction of specific improvements identified by the Plan (Condition M.7).

Reasons for Other Recommended Requirements (GUP)

1. The recommended Conditions of Approval preserve open space, sensitive natural resources and viewsheds in the Stanford foothills consistent with the objectives of the Stanford University Community Plan's fundamental Academic Growth Boundary Strategy and policies of the Resource Conservation Chapter.
2. The recommended Conditions are consistent with Stanford University Community Plan policies that call for protection of trees and identify replacement ratios for trees (1:1 ratio) and oak woodlands (3:1 ratio) that cannot be preserved (adopted SCP-RC (i) 7); require Stanford to protect and maintain habitats, natural areas, and wildlife corridors, and avoid habitat areas for special species in the location of development and mitigate any impacts on special status species or other biological resources (adopted SCP-RC 3, 4, and 6); and require development to conform to the Stanford University Habitat Conservation Plan [proposed SCP-RC (i) 5].
3. Review of specific development proposals through the Architecture and Site Approval process will ensure conformance with SCP and zoning requirements and address compatibility of development with the surrounding area. ASA review for future development within 100 feet of El Camino Real will conform to design parameters of an updated El Camino Real Frontage Plan.
4. The recommended Park Study provides a means to identify and implement park facilities to serve campus residents and to prevent lack of adequate Stanford park facilities from

placing a burden on parks in surrounding jurisdictions, consistent with Stanford University Community Plan provisions that require planning for parks and open space land within the Academic Growth Boundary (Open Space Strategy #3); and call for sufficient campus parks and open space in or near residential areas at the rate of 5 acres per 1,000 population (adopted SCP-OS(i) 8).

5. The recommended Municipal Services Study will ensure that adequate services are provided within the Stanford Community Plan area and that provision of these services does not place a burden on surrounding jurisdictions; and is consistent with Stanford University's commitment in the 1985 Land Use Policy Agreement (signed by Stanford, County of Santa Clara, and the City of Palo Alto) to provide all municipal services to unincorporated portions of Stanford lands, including contractual arrangements for services as needed.
6. The recommended Master Drainage Plan requirements will provide for full mitigation of increased runoff from all development from 2000 through the life of this GUP and avoid exacerbating flows from storm events in San Francisquito and Matadero Creeks.

IV. DEPARTMENT RECOMMENDATIONS – WATER SUPPLY ASSESSMENT

The WSAs conclude that water supplies are sufficient to accommodate the potable and non-potable water demand from buildout of both the proposed project and Housing Alternatives A and B through existing water entitlements and resources under normal, single dry, and multiple dry water years (**Attachment G**). The WSAs for Alternatives A and B indicate that during normal water years, Stanford's potable water allocation and existing non-potable water resources (groundwater and surface water) would be sufficient to accommodate the potable and non-potable water demand through buildout of each of the Alternatives, but in single and multiple dry water year scenarios, Stanford would need to supplement its potable water supply with treated groundwater from its wells in order to accommodate the estimated increase in potable water demand.

The WSAs point out that in multiple dry years, Stanford would implement water conservation measures to ensure that Stanford's potable and non-potable water use would not exceed the available supply, reducing potable water demand by 15 percent in the second year and 25 percent in the third year. Stanford achieved such reductions during the most recent drought under the 2000 General Use Permit.

The Department recommends approval of the Water Supply Assessments for the proposed project and Housing Alternatives A and B.

V. DEPARTMENT RECOMMENDATION FOR ENVIRONMENTAL DETERMINATION

The Stanford University 2018 General Use Permit Environmental Impact Report (EIR)¹¹ has been prepared and processed in conformance with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines to inform decision-makers and others interested in the project regarding the environmental effects of the proposed project. The Draft EIR was circulated for public review in October 2017. In June 2018, in response to public comments on the Draft EIR, the County revised and circulated for public review Recirculated Portions of the Draft EIR. In December 2018, the County released the Final EIR, which integrates the Draft EIR and Recirculated Portions of the Draft EIR into a single document that includes public comments, responses to those comments and revisions to the Draft EIR.

The EIR addresses the proposed project and the following alternatives to the project: No Project/No Development Alternative, No Project/Individual Use Permits Alternative, Reduced Project Alternative, Historic Preservation Alternative, Additional Housing Alternative A, and Additional Housing Alternative B. The EIR provides a full analysis of the significant environmental impacts of Housing Alternatives A and B. Alternative A provides environmental clearance for the full housing demand generated by Stanford's 2018 GUP Application, up to 5,699 units/beds. Alternative A was analyzed at an equivalent level as the proposed project analysis. The Recirculated Draft EIR full analyzed the impacts of accommodating the full housing demand generated by Stanford's 2018 GUP Application on campus, up to 5,699 units/beds. The public was provided an opportunity to comment on Alternative A and its impacts when the Draft EIR was recirculated, and the Final EIR responded to public comments received on Alternative A and its impacts.

The Department is recommending adoption of the GUP with the Conditions of Approval requiring Stanford to build 2,172 housing units to address the housing demand associated with the construction of 3.5 million new square feet of development. The environmental impacts of constructing this additional housing were evaluated as Alternative A within the Stanford GUP Environmental Impact Report (EIR) prepared for the project. The EIR discloses that construction of Alternative A would have more significant environmental

¹¹ https://www.sccgov.org/sites/dpd/programs/stanford/pages/gup2018_ceqa.aspx

impacts than the proposed GUP application submitted by Stanford. (See **Attachment I** for a summary of the environmental impacts of Alternative A as compared to the project.)

These additional environmental impacts are related to potential additional traffic and construction activity associated with the additional housing units and on-site residents at Stanford University. Despite the potential for these additional environmental impacts, the Department is recommending the Board of Supervisors adopt the Conditions of Approval requiring the construction of 2,172 housing units to ensure that Stanford fully addresses housing demand from construction of an additional 3.5 million square feet of development. If the County does not require Stanford to provide sufficient housing to address housing demand, ongoing development at Stanford would exacerbate the housing affordability crisis that acutely impacts the areas around the University.

Resulting impacts would include an increase in the percentage of families living in substandard housing and longer commute times as workers are compelled to find affordable housing outside of the region. This deficiency in housing and decrease in affordability worsens social inequity throughout the region, creating more displacement and socio-economic fragmentation in local communities. The need to address these broader socio-economic impacts by ensuring that Stanford fully mitigates the housing impacts of its increased development outweigh the significance of the additional environmental impacts disclosed within the EIR.

VI. BACKGROUND

A. Project Site

The project site consists of approximately 4,017 acres of Stanford University lands in unincorporated Santa Clara County located adjacent to the Cities of Palo Alto, Menlo Park, and Portola Valley, and unincorporated areas of San Mateo County, as shown in **Figure 9**. The project site includes the University's central campus area located generally north of Junipero Serra Boulevard (approximately 1,800 acres) and the largely undeveloped Stanford foothills located generally south of Junipero Serra Boulevard (approximately 2,200 acres). It does not include other Stanford lands located in adjacent jurisdictions.

The central campus area is developed with a diverse mix of land uses, including classrooms, academic offices, laboratory space, athletic venues, museums, performance and arts venues, lands for outdoor learning, student housing, faculty/staff housing, support facilities, and open spaces. The Stanford foothills include a mixture of grasslands, woodlands, and riparian areas. Existing uses consist of livestock grazing and other agricultural uses, academic facilities, a portion of the Stanford Golf Course, and public and private trails.

B. Regulatory Overview

Since the 1980s, the County has regulated development of the Stanford University campus through a series of General Use Permits that authorized uses and levels of new development for implementation over a period of years. The site currently operates under the Stanford 2000 GUP, approved by the Board of Supervisors on December 12, 2000. On that date, the Board of Supervisors also adopted the Stanford University Community Plan (SCP) as a component of the General Plan to provide a land use framework for development of the Stanford University campus. The currently proposed GUP is intended to replace the approved 2000 GUP that is nearing full implementation

Pursuant to the SCP and the 1985 Policy Agreement, academic development of unincorporated Stanford lands is subject to the County's land use jurisdiction. The Stanford Policy Agreement among the County, City of Palo Alto, and Stanford University establishes mutual policies regarding land use, annexation, and development, and specifies that unincorporated Stanford lands planned for academic use are subject to the County's General Plan, Zoning Ordinance, and other land use requirements, and are not subject to annexation to the City of Palo Alto. The agreement further clarifies that lands planned for non-academic uses (i.e., uses intended to produce income to support the University) require annexation prior to development.

Based on the requirements of the A1 General Use Zoning District, which is applicable to most of the site's central campus area, a Use Permit is required for new academic, academic support, and housing uses. Because the current application includes Stanford Community Plan and zoning map amendments that require approval by the Board of Supervisors, all three proposed land use approvals are being processed concurrently, with the Planning Commission in an advisory role and the Board of Supervisors as the final decision-maker, consistent with Zoning Ordinance Section 5.10.060.

C. Public Outreach

The public hearing dates for the proposed General Use Permit and related applications have been noticed in accordance with applicable requirements and augmented with additional efforts. A public notice was mailed to all property owners within a 1,000-foot radius on May 10, 2019. A courtesy email notice has been provided to interested parties on the County's Stanford opt-in list and was sent on May 10, 2019. A published notice in a newspaper of general circulation was provided in the Palo Alto Weekly on May 17, 2019. Due to high levels of public interest, a new dedicated website (CountyStanford.info) was also established to provide additional public notice and information opportunities.

D. Next Steps

Planning Commission public hearings regarding this project are scheduled for **June 13, 2019, 1:30 PM** and **June 27, 2019, 1:30 PM** in the Isaac Newton Senter Auditorium at the County Government Center Building. During these hearings, the Planning Commission will consider staff recommendations, accept public testimony, deliberate, and make recommendations to the Board of Supervisors regarding the proposed project.

Due to the size of the Environmental Impact Report (EIR), the EIR is available at the following location:

https://www.sccgov.org/sites/dpd/programs/stanford/pages/gup2018_ceqa.aspx

Paper copies of the EIR are also available for public inspection during regular business hours at the Clerk of the Board and the Department of Planning and Development at 70 W. Hedding St., 7th Floor, East Wing, San Jose, CA; and in the libraries referenced in the above link.

LINKS:

- **Linked To: 96492** : Second study session relating to the Stanford General Use Permit application, proposed amendments to the Stanford University Community Plan and Zoning Map Amendments, Environmental Impact Report, and Development Agreement. Location: Stanford University Community Plan Area. Supervisorial District: 5. File Nos. PLN98-7165 (7165-98P-99GP-99EIR) and PLN16-7165 (7165-16P-16GP-16Z-16EIR).
- **Linked To: 95443** : Study session relating to background information on the existing Stanford University Community Plan, Stanford 2000 General Use Permit (GUP), 2018 GUP Application, and Sustainable Development Study and Supplement. Location: Stanford University Community Plan Area. Supervisorial District: 5. File Nos. PLN98-7165 (7165-98P-99GP-99EIR) and PLN16-7165 (7165-16P-16GP-16Z-16EIR).
- **Linked To: 96765** : Public Hearing to consider the following: Stanford University General Use Permit (GUP) Application (Application), Stanford GUP Environmental Impact Report (EIR), Stanford University Community Plan amendments, and Zoning Ordinance amendments. Location: Stanford University Community Plan Area. Zoning: A1 General Use, R1S Low-Density Campus Residential, R3S Medium-Density Campus Residential; OS/G Open Space and Field Research; SCA Special Conservation Area. Supervisorial District: 5. File Nos. PLN98-7165 (7165-98P-99GP-99EIR) and PLN16-7165 (7165-16P-16GP-16Z-16EIR).
- **Linked From: 97596** : Continued Public Hearing from June 13, 2019 (Item No. 4) to consider the following: Stanford University General Use Permit (GUP) Application (Application), Stanford GUP Environmental Impact Report (EIR), Stanford University Community Plan amendments, and Zoning Ordinance amendments. Location: Stanford University Community Plan Area. Zoning: A1 General Use, R1S Low-Density

Campus Residential, R3S Medium-Density Campus Residential; OS/G Open Space and Field Research; SCA Special Conservation Area. Supervisorial District: 5. File Nos. PLN98-7165 (7165-98P-99GP-99EIR) and PLN16-7165 (7165-16P-16GP-16Z-16EIR).

ATTACHMENTS:

- Attachment A_Statement of Overriding Considerations (PDF)
- Attachment B_Mitigation Monitoring and Reporting Program (PDF)
- Attachment C_Stanford Community Plan text and land use map amendments(PDF)
- Attachment D_Zoning Ordinance Map Amendments (PDF)
- Attachment E_SCP Zoning and GUP Findings (PDF)
- Attachment F_General Use Permit Conditions of Approval (PDF)
- Attachment G_Water Supply Assessments (PDF)
- Attachment H_SCP Text Amendments - Proposed by Stanford (PDF)
- Attachment I_EIR Table 7-4 - Comparison of Impacts of the Proposed Project and Alternatives (PDF)
- Attachment J_Figures (PDF)
- Attachment K_Public Comments (PDF)
- Staff Presentation - 5-30-19 (PDF)
- Staff Packet - COA summary, recommendations table, diagrams - 5-30-19 (PDF)
- Public Comments for 5-30-19 Meeting (PDF)
- Public Comment - Email from Luhrmann - 5-31-19 (PDF)
- Public Comment - Email from Haines - 5-31-19 (PDF)
- Public Comment - Email from George - 5-31-19 (PDF)
- Public Comment - Palo Alto Online article - 5-31-19 (PDF)
- Public Comment - Letter from Moran - 5-30-19 (PDF)
- Public Comment - Email from Chu - 6-5-19 (PDF)
- Public Comment - Email from Kirby - 6-5-19 (PDF)
- Public Comment - Email from Altmaier - 6-5-19 (PDF)
- Public Comment - Email from Biggar - 6-5-19 (PDF)
- Public Comment - Email from Landay - 6-5-19 (PDF)
- Public Comment - Letter from San Francisquito Creek JPA - 6-6-19 (PDF)
- Supplemental Staff Report for Continued Public Hearing on Stanford GUP and Associated Approvals (PDF)
- Attachment L_Response to Comments from 05-30-19 PC Hearing (PDF)
- Public Comment - Letter from Tuolumne River Trust - 6-7-19 (PDF)
- Public Comment - Email from Dimmick - 6-9-19 (PDF)
- Public Comment - Letter from Stanford - 6-10-19 (PDF)
- Public Comment - Letter from San Mateo County Manager - 5-30-19 (PDF)
- Public Comment - Letter from Holloway - 6-10-19 (PDF)
- Public Comment - Letter from Stanford - 6-11-19 (PDF)
- Public Comment - Memo from Center for Continuing Study of CA Economy - 6-11-19 (PDF)
- Public Comment - 48 emails - I Support Stanford's Proposed GUP - 6-13-19 (PDF)
- Public Comment - Email-letter from Shrager - 6-13-19 (PDF)

- Public Comment - Email from Stanford forwarding prior public comments - 6-13-19 (PDF)
- Staff Presentation - 6-13-19 (PDF)
- Stanford Written Comments - 6-13-19 (PDF)
- Public Comment - 6-13-19 (PDF)