

**FINDINGS OF THE COUNTY OF SANTA CLARA BOARD OF
SUPERVISORS TO CERTIFY AN ENVIRONMENTAL IMPACT
REPORT AND MAKE THE REQUIRED CEQA FINDINGS FOR THE
COUNTY RECOMMENDED STANFORD UNIVERSITY GENERAL USE
PERMIT PROJECT
(County File No. PLN16-7165 (7165-16P-16GP-16Z-16EIR-18DA))**

I. BACKGROUND

A. On November 21, 2016, Stanford University submitted a General Use Permit Application (“Stanford Proposed GUP”) to the County of Santa Clara (“County”). Among other things, the application proposes construction of up to 2,275,000 additional net new square feet of academic and academic support uses and up to 3,150 net new housing units/beds, as well as certain amendments to the Stanford University Community Plan (SCP) and related Zoning Ordinance amendments.

B. On January 10, 2017, the County prepared and distributed a Notice of Preparation to governmental agencies, organizations, and the public soliciting input on the environmental issues that should be addressed in the Environmental Impact Report (EIR) prepared for the Stanford Proposed GUP pursuant to the California Environmental Quality Act (CEQA), Pub. Res. Code § 21000 *et seq.* A public scoping meeting was held on February 8, 2017. The scoping period ended on February 17, 2017.

C. As allowed under CEQA Guidelines § 15084(d)(2), the County retained a consultant to assist with the preparation of the EIR. The County, as the lead agency, has directed preparation of the EIR and reviewed all material prepared by the consultant, and such material reflects the County’s independent judgment.

D. A Draft Environmental Impact Report was prepared for the Stanford Proposed GUP pursuant to CEQA and released for public review and comment from October 6, 2017 through February 2, 2018. Copies of the Draft EIR were provided to all responsible agencies, trustee agencies, community organizations, members of the public who had previously requested notice, and all persons and entities on the County’s Stanford University interested parties mailing list, including, but not limited to, the State Clearinghouse; San Francisco Bay Conservation and Development Commission; Bay Area Air Quality Management District; California Department of Transportation (District 4); Caltrans, Division of Aeronautics; California Highway Patrol; California Department of Fish and Wildlife (Region 3); California Department of Education; California Department of Parks and Recreation; Department of Toxic Substances; California Department of Water Resources; California Department of Housing and Community Development; State Water Resources Control Board, Division of Drinking Water; California Public Utilities Commission; State Lands Commission; California Regional Water Quality

ATTACHMENT B

Control Board (Region 2); California Native American Heritage Commission; City of Palo Alto; City of Menlo Park; City of East Palo Alto; City of Los Altos; Town of Los Altos Hills; Town of Portola Valley; County of San Mateo; Palo Alto Unified School District; Midpeninsula Regional Open Space District; Santa Clara Valley Transportation Authority; San Mateo County Transit District/SamTrans; Local Area Formation Commission of Santa Clara County; Santa Clara Valley Water District; San Francisquito Creek Joint Powers Authority; Committee for Green Foothills; Stanford Coalition for Planning an Equitable 2035 Stanford University; and, Southgate Neighborhood Committee Palo Alto, California. A notice of availability of the Draft EIR was also posted and copies made available on the Planning Office website, the County Clerk-Recorder's Office, the Palo Alto public libraries at Mitchell Park, Rinconada and College Terrace, the East Palo Alto library, and the Menlo Park library.

E. The County has complied with the California Native American Tribal consultation requirements set forth in AB 52 (Public Resources Code § 21080.3.1). The Ohlone Tribe is traditionally and geographically associated with the Stanford University campus lands in unincorporated Santa Clara County. On November 21, 2016, the County sent a letter to the Vice Chairperson of the Muwekma Ohlone Tribe ("Tribe") informing the Tribe that the County had received Stanford's proposed 2018 General Use Permit Application and extending an opportunity to the Tribe to consult on the proposed 2018 GUP project. When the County deemed Stanford's application complete, it sent a second letter to the Tribe on February 9, 2017 requesting consultation on the project. The County did not receive a response from the Tribe. In addition, on April 4, 2017, a Sacred Land Files search request was submitted to the Native American Heritage Commission (NAHC) for any Native American cultural resources that may be within or adjacent to the Stanford Proposed GUP site. On April 12, 2017, the NAHC responded that results of the Sacred Land Files search was negative.

F. During the Draft EIR public review period, the County received 19 comment letters from governmental agencies, 13 comment letters from organizations, and 184 comment letters from individuals. The County also held five public meetings to receive oral public comment on the Draft EIR. Many of these comments raised concerns that the Stanford Proposed GUP did not provide sufficient housing to meet the demand generated by the additional academic/academic support development that was proposed and would exacerbate the already-severe housing shortage in the area.

G. After receiving comments on the Draft EIR, the County revised certain portions of the Draft EIR and prepared and circulated a Recirculated Portions of Draft EIR document. Among other things, the Recirculated Portions of Draft EIR describe two additional housing alternatives that include additional housing beyond the level included in the Stanford Proposed GUP, and evaluate the impacts of these additional housing alternatives at a level of detail similar to the Draft EIR evaluation of the Stanford Proposed GUP. Additional Housing Alternative A assumes an additional 2,549 units/beds would be required in conjunction with development of Stanford's 2,275,000 square feet of academic/academic support space, for a total of 5,699 new

ATTACHMENT B

units/beds. Additional Housing Alternative B assumes an additional 1,275 units/beds of on-campus housing would be required, for a total of 4,425 new units/beds.

H. The Recirculated Portions of Draft EIR document was published on June 12, 2018 for a public review and comment period ending July 26, 2018. Notice of the availability of the Recirculated Portions of Draft EIR document was provided in the same manner as for the Draft EIR, and copies were provided at the same locations and to the same persons and entities as the Draft EIR.

I. In December 2018, the County prepared a Final EIR consisting of: a revised Consolidated Draft EIR (Part 1), and a Response to Comments Document (Part 2), including associated appendices to Parts 1 and 2. The Consolidated Draft EIR combines the contents of the Draft EIR and the Recirculated Portions of Draft EIR. The Response to Comments Document provides responses to comments received during the public review periods for the Draft EIR and Recirculated Portions of Draft EIR and describes revisions that were made to the Draft EIR and Recirculated Portions of Draft EIR in response to these public comments.

J. The County Department of Planning and Development has recommended the approval of the Stanford Proposed GUP as modified by the additional housing in Additional Housing Alternative A (“County Recommended GUP”). The findings and Statement of Overriding Considerations herein address the County Recommended GUP.

K. A Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the County Recommended GUP Project in compliance with CEQA.

L. As of October 3, 2019, the County has held, sponsored or otherwise participated in numerous publicly noticed meetings, workshops and hearings regarding the 2018 GUP, including the following:

- April 13, 2017 Stanford Community Resource Group meeting at Palo Alto Rinconada public library
- May 11, 2017 Stanford Community Resource Group meeting at Palo Alto Rinconada public library
- October 12, 2017 public meeting at Palo Alto City Hall
- October 19, 2017 public meeting at Palo Alto City Hall
- November 15, 2017 Menlo Park City Council meeting at Menlo Park City Hall
- November 30, 2017 County Planning Commission Meeting at Palo Alto Arts Center Auditorium
- January 23, 2018 public meeting at Palo Alto City Hall
- June 27, 2018 meeting at Menlo Park City Hall
- July 10, 2018 public meeting at Palo Alto Arts Center Auditorium

ATTACHMENT B

- November 29, 2018 Development Agreement Community Meeting at Palo Alto City Hall
 - December 20, 2018 County Historical Heritage Commission meeting at County Government Center
 - January 17, 2019 County Historical Heritage Commission meeting at County Government Center
 - February 28, 2019 County Planning Commission study session at County Government Center
 - March 15, 2019 County Board of Supervisors' Housing, Land Use, Environment, and Transportation Committee meeting at County Government Center
 - March 20, 2019 Stanford Community Resource Group meeting at Palo Alto Rinconada public library
 - March 21, 2019 County Historic Heritage Commission meeting at County Government Center
 - April 10, 2019 County Historic Heritage Commission Meeting at County Government Center
 - April 18, 2019 County Historic Heritage Commission Meeting at County Government Center
 - May 9, 2019 County Planning Commission study session at County Government Center
 - May 30, 2019 County Planning Commission meeting at Palo Alto City Hall
 - June 13, 2019 County Planning Commission meeting at County Government Center
 - June 27, 2019 County Planning Commission meeting at County Government Center
 - September 24, 2019 County Board of Supervisors study session at County Government Center
- M. On May 30, June 13, and June 27, 2019, the County Planning Commission held a duly noticed public hearing to consider the 2018 GUP; the Final EIR; various documents and information provided by the County Department of Planning Development including, but not limited to, staff reports, recommended conditions of approval, and proposed Community Plan and Zoning Ordinance amendments; and oral and written testimony and documentary evidence submitted to the Planning Commission by Stanford University, public agencies, various organizations, and other members of the public. At the June 27, 2019, hearing, the Planning Commission voted unanimously to forward favorable recommendations to the Board of Supervisors to certify the Final EIR, and adopt CEQA findings and a Statement of Overriding Considerations.
- N. In October, 2019 the County prepared a First Amendment to Final EIR (Attachment

ATTACHMENT B

AA to the October 8, 2019 staff report to the Board of Supervisors), which includes a revised Water Supply Assessment dated October 2019, responses to selected comments received after the close of the Draft EIR public review period, final mitigation measures, and Final EIR Errata.

II. SUMMARY OF COUNTY RECOMMENDED GUP PROJECT

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. The GUP Application is intended to replace the approved 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.

The County Recommended GUP consists of the Stanford Proposed GUP as modified by the additional housing included in Additional Housing Alternative A. The Stanford Proposed GUP includes construction of 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. Additional Housing Alternative A modifies the Stanford proposal by adding additional 2,549 units/beds, for a maximum total of 2,892 housing units and 2,807 student beds.

The County Recommended GUP Project also includes associated discretionary approvals, including GUP Conditions of Approval, Stanford University Community Plan (SCP) Amendments, Zoning Ordinance Map amendments, and Water Supply Assessment. The SCP amendments bring the SCP up to date with current conditions. The SCP amendments update background text and figures to reflect current information, and update policies and implementation measures to reflect current conditions. The recommended Conditions of Approval for the GUP, as well as the County Recommended GUP, are consistent with these SCP amendments.

III. CERTIFICATION OF THE EIR

The Final EIR dated December 2018 (Attachment A to the October 8, 2019 staff report to the Board of Supervisors) and First Amendment to the Final EIR dated October 2019 (Attachment AA to the October 8, 2019 staff report to the Board of Supervisors), which is incorporated by reference herein, constitutes the Final EIR for the County Recommended GUP and related conditions of approval, mitigation measures, and other approvals and actions that are included in the County Recommended GUP (collectively, the "County Recommended GUP

ATTACHMENT B

Project”) including Stanford University Community Plan Amendments, Zoning Ordinance Map amendments, and Water Supply Assessment.

The County Board of Supervisors hereby certifies pursuant to CEQA Guidelines § 15090 that:

- A. The Final EIR has been completed in compliance with CEQA;
- B. The Final EIR was presented to the decision-making body of the lead agency—the County Board of Supervisors—and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the project; and,
- C. The Final EIR reflects the lead agency’s independent judgment and analysis.

IV. BOARD OF SUPERVISORS FINDINGS

A. The Final EIR has been presented to the Board of Supervisors, and the Board of Supervisors has reviewed and considered the information contained therein before taking action on the County Recommended GUP Project.

B. In taking action on the County Recommended GUP Project, the Board of Supervisors reviewed and considered the information contained in the EIR, staff reports, oral and written testimony received from members of the public and other public agencies, and all additional information contained in reports, correspondence, studies, proceedings, and other matters of record included or referenced in the administrative record of these proceedings.

C. The administrative record upon which these findings are based includes, but is not limited to, the following:

- 1. The Final EIR;
- 2. The reports and other documents referenced in the Final EIR;
- 3. The draft Mitigation Monitoring and Reporting Program;
- 4. All reports, studies, memoranda, maps, staff reports, or other planning documents related to the County Recommended GUP Project prepared by the County or consultants to the County with respect to the County's compliance with the requirements of CEQA and with respect to the County's action on the County Recommended GUP Project;
- 5. The record of proceedings for the Planning Commission’s May 30, June 13, and June 27, 2019 hearing to consider the 2018 GUP, EIR, and related County approvals.
All oral, written and electronic evidence submitted to the County prior to the close of the Board of Supervisors hearings on the Project;
- 6. Any documents expressly cited herein, in addition to those cited above;
- 7. All documents constituting the record pursuant to Public Resources Code §

ATTACHMENT B

21167.6(e); and,

8. All matters of common knowledge to this Board of Supervisors including, but not limited to, state and federal laws and regulations and County policies, ordinances, guidelines and regulations.

The administrative record is located in the County Department of Planning and Development and the Office of the Clerk of the Board of Supervisors. The custodian the administrative record is: Megan Doyle, Clerk of the Board of Supervisors, 70 W. Hedding Street, 10th Floor, East Wing, San José, California 95110.

V. CEQA FINDINGS OF FACT

Public Resources Code § 21002 provides that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. In the event that specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof. (Public Resources Code § 21002.) The requirements set forth in Public Resources Code § 21002 are implemented, in part, through the requirement that public agencies must adopt findings before approving projects for which EIRs are required. (Public Resources Code § 21081(a); CEQA Guidelines § 15091(a).)

Public Resources Code § 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors." CEQA Guidelines § 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors "Goleta II"* (1990) 52 Cal.3d 553, 565.) The concept of "feasibility" also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) "[F]easibility" under CEQA encompasses "desirability" to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*Id.*; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) Alternatives and mitigation measures may also be determined to be infeasible if they do not "fully satisfy the objectives associated with a proposed project" or are "undesirable from a policy standpoint." (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

For a project that has significant impacts that cannot be avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse

ATTACHMENT B

environmental effects." (CEQA Guidelines § 15093, 15043(b); see also Public Resources Code § 21081(b).)

Pursuant to Public Resources Code § 21081 and CEQA Guidelines § 15091, no public agency shall approve or carry out a project for which a Final EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The Board of Supervisors hereby makes one or more of these specific written findings regarding each significant impact associated with the proposed project. Those specific findings for each significant impact, along with a presentation of facts in support of the findings and the text of mitigation measures proposed for adoption, are presented in Exhibit 1, attached hereto and incorporated herein. These findings are summarized below.

A. Significant Environmental Impacts. The EIR analyzes all of the County Recommended GUP Project's significant environmental impacts. The Project has the potential to directly and/or indirectly significantly impact the following environmental resources: visual and scenic resources, air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise and vibration, recreation, transportation and traffic, and utilities and service systems, as well as off-campus environmental resources due to construction of off-campus housing. The 2018 GUP Project's significant impacts are discussed in chapters 5, 6, and 7 of the Consolidated Draft EIR. Based on information in the EIR and other documents in the record, the Board of Supervisors finds that the County Recommended GUP Project does not have the potential to cause any significant environmental impacts other than the impacts identified in the EIR.

B. Impacts That Cannot be Avoided or Mitigated to Less-Than-Significant Levels. The environmental impacts of the County Recommended GUP Project that cannot be avoided or mitigated to less-than-significant levels, despite the adoption and implementation of all feasible mitigation measures and alternatives are set forth in the following table. The term "Project" as

ATTACHMENT B

used in the table refers to the County Recommended GUP Project.

Environmental Resource	Impact Number(s)	Impact Description
Air Quality	7A.2-4	Project operational emissions from new development would result in emissions of criteria air pollutants (PM ₁₀) at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants.
	7A.2-8	Project operational emissions from new development could conflict with or obstruct implementation of an applicable air quality plan.
	7A.2-9	Project operational emissions from new development would result in emissions of PM ₁₀ that would be cumulatively considerable.
Cultural and Paleontological Resources	7A.4-1	Project development could cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5.
	7A.4-6	Project development, in combination with past, present, existing, approved, pending and reasonably foreseeable future developments, could contribute considerably to significant cumulative adverse changes in the significance of historical resources.
Noise and Vibration	7A.11-2	Project construction could result in a substantial temporary or periodic increase in ambient noise levels in the Project site vicinity.
	7A.11-6	Project construction noise, in combination with past, present, existing, approved, pending and reasonably foreseeable future developments could contribute considerably to significant cumulative noise impacts.
Transportation & Traffic	7A.15-2	Project implementation could increase traffic volumes at area intersections, creating adverse impacts under 2018 Baseline with Project conditions.
	7A.15-3	Project implementation could increase traffic volumes on area freeways, creating adverse impacts under 2018 Baseline with Project conditions.
	7A.15-9	Project implementation, in combination with other past, present, and reasonably foreseeable future projects, could increase traffic volumes at area intersections, contributing considerably to significant adverse impacts under 2035 Cumulative with Project

ATTACHMENT B

		conditions.
	7A.15-10	Project implementation, in combination with other past, present, and reasonably foreseeable future projects, could increase traffic volumes on area freeways, contributing considerably to significant adverse impacts under 2035 Cumulative with Project conditions.
Various environmental resources	7A.17-1	The construction and/or operation of off-site housing would result in offsite environmental impacts.

C. Alternatives Considered in EIR. CEQA requires an EIR to describe a range of reasonable alternatives to the project, or project location, that would feasibly attain most of the project’s basic objectives, but would avoid or substantially lessen the project’s significant environmental effects. (CEQA Guidelines § 15126.6(a).) The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to describe and consider only those alternatives necessary to permit informed public participation, and an informed and reasoned choice by the decision-making body (CEQA Guidelines § 15126.6(a), (f)). Also, CEQA Guidelines § 15126.6(e)(1) requires an EIR to describe and analyze a no project alternative” “to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project.”

Chapter 7 of the Consolidated Draft EIR, Section 7.3, discusses four alternatives that were considered but rejected for detailed evaluation in the EIR, and the reasons why they were rejected for detailed evaluation. These are the off-site alternative, the all-academic growth/no new housing alternative, and the all housing alternative, and the no construction noise variance alternative.

Chapter 7 of the Consolidated Draft EIR, Section 7.4, describes and provides an in-depth environmental impact analysis of five alternatives to Stanford University’s proposed 2018 GUP.

1. *No Project Alternative.* The No Project Alternative is discussed in Section 7.4.1 of the Consolidated Draft EIR. Two No Project Alternatives are described and evaluated: (a) no additional development is permitted (“No Project/No Development”); and (b) additional development is permitted through permits issued for each individual development project (“No Project/Individual Permits”).

- (a) *No Project/No Development.* This alternative assumes that there would be no net increase in academic/academic support square footage or student housing units on the Stanford campus beyond that allowed by the 2000 GUP. Remodeling, redevelopment, and infrastructure improvements would still occur subject to the 2000 GUP and mitigation measures. Although this alternative would

ATTACHMENT B

result in substantially less development and population on the project site and environmental impacts as compared to the Stanford Proposed GUP and the County Recommended GUP, it would fail to achieve the primary project purpose of continuing to allow the campus to grow at historical rates and would not meet most of the basic project objectives (see Consolidated Draft EIR pp. 7-22-23). For this reason, the No Project/No Development alternative is rejected on the grounds that it is infeasible.

- (b) *No Project/Individual Permits.* This alternative assumes that Stanford would apply for a separate use permit for each development project, with conditions of approval and mitigation measures similar to those under the 2000 GUP. This alternative would result in somewhat reduced levels of academic and housing development than would occur under the Stanford's Proposed 2018 GUP. It also assumes that that Stanford would not implement certain commitments made in its 2018 GUP application for future development (e.g., No Net New Commute Trips standard, certain sustainability programs and practices).

This alternative could meet most project objectives but not to the same degree as the Stanford Proposed GUP and the County Recommended GUP. Although it may slightly reduce environmental impacts, it would not avoid the significant and unavoidable project and cumulative impacts related to construction noise, traffic, and historical resources. It could also lead to greater traffic impacts on the surrounding community if there were no comprehensive approach to reducing trip generation. The SCP recognizes the need for a comprehensive approach to addressing development on the Stanford University campus when stating (p. 11) that “[t]he General Use Permit will remain as the principal means for implementing the Community Plan.” Further, policy SCP-GD 6 mandates that “[d]evelopment within the AGB may only be permitted through a General Use Permit approved by the County.” For this reason, this alternative is rejected as infeasible because it is inconsistent with the Community Plan directive that campus development be addressed comprehensively through the GUP process. This alternative also is rejected because it would not avoid the significant and unavoidable impacts of the Stanford Proposed GUP or the County Recommended GUP, and could result in worse traffic impacts.

2. *Reduced Project Alternative.* This alternative is described and analyzed in Section 7.4.2 of the Consolidated Draft EIR. It assumes that a new GUP would be granted for a smaller amount of development that is 43% less than what Stanford has proposed. It is assumed that this would result in 1.3 million net new square feet of academic/academic support development and 700,000 net new square feet of housing consisting of 1,000 undergraduate beds, 500 graduate student beds, and 300 faculty/staff units. It also assumes that all of this

ATTACHMENT B

development would be constructed within the first 10 years of the permit, consistent with Stanford University's historical growth rate.

The environmental impacts of this alternative would be approximately the same as Stanford proposal during the first 10 years, and less thereafter. For example, this alternative would avoid the significant and unavoidable traffic impacts at several intersections and area freeway segments that would be caused by the Stanford Proposed GUP and the County Recommended GUP. This alternative, however, would impair achievement of the project objectives because it would not allow Stanford to fully advance its academic mission, accommodate increasing enrollment, or keep pace with its historical growth rate (see Consolidated Draft EIR p. 7-34). For these reasons, this alternative is rejected as infeasible.

3. *Historic Preservation Alternative.* This alternative is described and analyzed in Section 7.4.3 of the Consolidated Draft EIR. It would require the preservation of all buildings and structures on the project site that are identified as historic resources in the Draft EIR. This alternative assumes a similar amount of development as the Stanford Proposed GUP. This alternative would avoid the significant and unavoidable impacts on historical resources associated with the Stanford Proposed GUP and the County Recommended GUP, but the impacts on other environmental resources would be approximately the same.

This alternative would achieve the primary project objective of continued growth and development on the campus, but would impair the ability to meet project objectives regarding maintaining flexibility to develop its lands, keeping pace with its historical growth rate, accommodating increasing enrollment, and balancing new academic and housing development (see Consolidated Draft EIR pp. 7-38-39). For these reasons, this alternative is rejected as infeasible.

4. *Additional Housing Alternative A.* This alternative is described and fully analyzed in Section 7.4.4 of the Consolidated Draft EIR. Housing Alternative A assumes the same level of academic and academic support development (2.275 million net new square feet) as the Stanford Proposed 2018 General Use Permit. It would also provide 2,549 units/beds of housing, equivalent to the net increase in off-campus housing demand that would occur under the Stanford Proposed 2018 General Use Permit. This alternative is now incorporated into the County Recommended General Use Permit, which is more fully described in Section II of this document.

The Recirculated Portions of the Draft EIR evaluated the impacts of this alternative at a level of detail similar to the Stanford Proposed GUP. Compared to the Stanford Proposed GUP, this alternative would have new significant unavoidable air quality impacts, significant and unavoidable transportation impacts at additional intersections and freeway segments, and a number of more severe significant impacts (see Consolidated Draft EIR Table 7-4).

ATTACHMENT B

The Consolidated Draft EIR (p. 7-244) states that Additional Housing Alternative A would fail to achieve the primary project objective and would also not fully achieve several more specific project objectives. However, the primary project objective is to “authorize continued growth and development on the campus in a manner that implements the Stanford Community Plan’s policies and that is consistent with the growth assumptions in the approved Sustainable Development Study.” The Board finds that the County Recommended GUP is consistent with the primary project objective because it is consistent with the adopted SCP and proposed amendments, which call for a variety of housing types and supplies and require that new housing development occur commensurate with the approvals for new academic development.

Although the County Recommended GUP does not meet the project objectives in the same way as the Stanford Proposed GUP, the Board nevertheless finds that the County Recommended GUP is feasible to implement and provides important housing benefits by fully addressing the housing impacts caused by the Stanford Proposed GUP. It substantially reduces the Stanford Proposed GUP’s housing impacts by requiring Stanford to fully meet the housing demand created from its ongoing growth, so as to not exacerbate the existing housing crisis around the Stanford Community Plan area. Without requiring Stanford to fully meet its housing demand 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 housing outside of the area. This deficiency in housing and decrease in overall affordability would worsen social inequity throughout the region, creating more displacement and socio-economic impacts in local communities.

5. *Additional Housing Alternative B.* This alternative is described and fully analyzed in Section 7.4.5 of the Consolidated Draft EIR. Housing Alternative B assumes the same level of academic and academic support development (i.e., 2.275 million net new square feet) as the Stanford Proposed 2018 General Use Permit. It would also provide additional 1,275 units/beds of on-campus housing, equivalent to half the net increase in off-campus housing demand that would occur under the Stanford Proposed 2018 General Use Permit.

The Recirculated Portions of the Draft EIR evaluated the impacts of this alternative at a level of detail to the Stanford Proposed GUP. Compared to the Stanford Proposed GUP, this alternative would have several more severe significant impacts capable of mitigation (see Consolidated Draft EIR Table 7-4). The Consolidated Draft EIR (p. 7-446) also states that Additional Housing Alternative B would fail to achieve the primary project objective, and would also not fully achieve several more specific project objectives; however, for similar reasons as discussed for Additional Housing Alternative A, the Board finds that the Additional Housing Alternative B is consistent with the primary project objective.

Nevertheless, the Board finds this alternative be considered infeasible on policy grounds because it fails to require Stanford to fully meet the housing demand created from its ongoing growth, exacerbating the existing housing crisis in the Stanford area and producing the adverse

ATTACHMENT B

socioeconomic consequences described under Additional Housing Alternative A. For the same reasons, implementation of the Stanford Proposed 2018 GUP without the additional housing provided by Additional Housing Alternative A is also considered infeasible.

6. *Environmentally Superior Alternative.* Of the alternatives analyzed in the EIR, the environmentally superior alternative is the No Project/No Development Alternative. If the environmentally superior alternative is the no project alternative, CEQA Guidelines § 15126.6(e)(2) requires the EIR to identify an environmentally superior alternative among the other alternatives. Among the other alternatives, the Reduced Project Alternative would be environmentally superior. See Consolidated Draft EIR Section 7.6. However, the Reduced Project Alternative has been found infeasible in these findings. Further even though the County Recommended GUP is not the environmentally superior alternative, it is proposed for implementation because, as previously described, it will not contribute to the worsening of the regional housing crisis and its adverse socioeconomic impacts, and fully addresses the impacts on housing caused by the Stanford Proposed GUP.

D. Finding Regarding Mitigation of Impacts. With the adoption of the mitigation measures described in Exhibit I and incorporation of those mitigation measures into the Conditions of Approval for the County Recommended GUP, changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the County Recommended GUP Project's significant environmental effects to the extent feasible, except for the significant and unavoidable impacts identified in Section V.B, above.

E. Findings Regarding Recirculation of Draft EIR. Under CEQA Guidelines § 15088.5, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline

ATTACHMENT B

to adopt it.

- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

None of the information contained in the Final EIR constitutes “significant new information” requiring recirculation of the EIR. Any revisions made to the Draft EIR that required recirculation were included in the Recirculated Portions of Draft EIR document published on June 12, 2018, and recirculated for additional public review and comment. That document’s new information included the description and analysis of two new additional housing alternatives, and the identification of a new significant off-campus housing impact.

The Final EIR includes comments on the Draft EIR and the Recirculated Portions of Draft EIR; responses to those comments; revisions to the Draft and EIR and Recirculated Portions of the Draft EIR; and additional technical appendices. These comments, responses, revisions, and appendices do not constitute significant new information that would trigger Draft EIR recirculation because they do not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. For example, they do not disclose a new or substantially more severe significant impact that would be caused by proposed project or alternatives. Nor does the Final EIR identify any feasible project alternatives or mitigation measures considerably different from those previously analyzed in the Draft EIR or Recirculated Portions of Draft EIR that would clearly lessen the proposed project’s or alternatives’ significant environmental impacts. The Final EIR’s responses to comments, revisions to the Draft EIR and Recirculated Portions of the Draft EIR, and technical appendices merely clarify and amplify information presented in the Draft EIR and the Recirculated Portions of Draft EIR.

After publication of the Final EIR, the County prepared the First Amendment to the Final EIR dated October 2019 which includes a revised Water Supply Assessment dated October 2019, responses to selected comments received after the close of the Draft EIR public review period, and Final EIR Errata, and minor clarifications and revisions to the text of mitigation measures presented in the Final EIR. None of the information of Amendment 1 constitutes significant new information that would trigger Draft EIR recirculation because it does not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. For example, it does not disclose a new or substantially more severe significant impact that would be caused by proposed project or alternatives evaluated in the Draft EIR or Recirculated Portions of the Draft EIR. Nor does it identify any feasible project alternatives or mitigation measures considerably different from

ATTACHMENT B

those previously analyzed in the Draft EIR or Recirculated Portions of Draft EIR that would clearly lessen the proposed project's or alternatives' significant environmental impacts. In particular, the clarifications and revisions to mitigation measures in the EIR Errata, which are documented in Exhibit 1, and are reflected in the proposed Conditions of Approval, did not reduce the effectiveness of any of the mitigation measures described in the Final EIR in reducing significant impacts, or introduce any new mitigation measures considerably different from those previously analyzed in the Draft EIR or Recirculated Portions of Draft EIR that were subject to public review and comment.

After publication of the Final EIR, additional amendments to the SCP were proposed by County staff that were not described in the Draft EIR project description. The amendments update and amend the SCP 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. The Community Plan amendments identify a maximum development build-out for Stanford that is consistent with the square footage in the County Recommended GUP and evaluated in the EIR. The amendments also incorporate applicable policies from the County's adopted 2015 General Plan Health Element that was previously subject to CEQA review. These amendments do not constitute significant new information that would trigger Draft EIR recirculation because they do not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. For example, they do not disclose a new or substantially more severe significant impact that would be caused by the proposed project or alternatives evaluated in the Draft EIR or Recirculated Portions of the Draft EIR.

Also, after publication of the Final EIR, the County Department of Planning and Development recommended the approval of the County Recommended GUP, which is the Stanford Proposed GUP (i.e., the Draft EIR proposed project) as modified by Additional Housing Alternative A. The Recirculated Portions of the Draft EIR previously evaluated Additional Housing Alternative A in detail, and the public was given the opportunity to review comment on this alternative and its impacts. Modification of the Draft EIR proposed project at the project approval stage to incorporate a previously and fully evaluated alternative does not represent significant new information triggering Draft EIR recirculation. (See *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App. 5th 321, 335 (lead agency properly adopted a revised project that was similar to an alternative identified in the Draft EIR; components of the revised project were properly evaluated in the EIR and subject to public comment).) The CEQA process "is not designed to freeze the ultimate proposal in the precise mold of the initial project." (*Id.*)

After publication of the Final EIR, additional public comments were received on the Final EIR and GUP, including public comments submitted to the Planning Commission for its May 30, June 13, and June 27, 2019 hearing, and comments submitted to the Board of Supervisors for its hearing, and the County responded to some of these comments orally or in

ATTACHMENT B

writing. These comments and responses do not constitute significant new information that would trigger Draft EIR recirculation because they do not deprive the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. For example, they do not disclose a new or substantially more severe significant impact that would be caused by proposed project or alternatives evaluated in the Draft EIR or Recirculated Portions of the Draft EIR. Nor do they identify any feasible project alternatives or mitigation measures considerably different from those previously analyzed in the Draft EIR or Recirculated Portions of Draft EIR that would clearly lessen the proposed project's or alternatives' significant environmental impacts.

Exhibits to these Findings—

Exhibit 1—Findings on Significant Impacts

EXHIBIT 1¹
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
Visual and Scenic Resources				
<p>Impact 7A.1-4: Additional Housing Alternative A could create a new source of substantial light or glare that would adversely affect nighttime views in the area.</p>	Significant	<p>Mitigation Measure 7A.1-4: Stanford shall submit a lighting plan for approval by the County Planning Office <u>Director</u>, as part of an <u>Architecture and Site Approval (ASA)</u> review, for each development project that would include exterior light sources. The plan shall show the extent of illumination that would be projected from proposed outdoor lighting. State-of-the-art luminaries shall be used where necessary, with high beam efficiency, sharp cut-off, and glare and spill control. Upward glow shall not be allowed in residential or academic uses.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.1-4 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, new housing development proposed under Additional Housing Alternative A could increase ambient light levels due to light dispersion from the new buildings, which may result in spillover lighting within the Project site or in adjacent neighborhoods, and could adversely affect nighttime views in the vicinity of the Project site. In order to assure that new lighting constructed under Additional Housing Alternative A would not adversely affect nighttime view in the area, implementation of a lighting plan for development projects that would have exterior light sources, as specified in Mitigation Measure 7A.1-4, would reduce the impact to a less than significant level. No additional mitigation measures are required.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-53 to 7-54</p>	Less-than-Significant
<p>Impact 7A.1-5: Additional Housing Alternative A, in combination with past, present, and future projects could potentially contribute to cumulative visual and scenic resource impacts.</p>	Significant	<p>Mitigation: Implement Mitigation Measure 7A.1-4.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A (Mitigation Measure 7A.1-4) which reduce its considerable contribution to light and glare impacts to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, implementation of a lighting plan identified in Mitigation Measure 7A.1-4, above, would similarly mitigate any contribution to cumulative visual and scenic resources impacts.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-54 to 7-55</p>	Less-than-Significant
Air Quality				
<p>Impact 7A.2-2: Additional Housing Alternative A construction would generate fugitive dust that could result in a</p>	Significant	<p>Mitigation Measure 7A.2-2: Best Management Practices for Controlling Particulate Emissions. Stanford shall require all construction contractors to implement the following measures:</p> <ul style="list-style-type: none"> All exposed surfaces (e.g. parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day; 	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.2-2 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities associated with individual projects</p>	Less-than-Significant

¹ Consistent with the Conditions of Approval, ~~strikeouts~~ show deletions to words and phrases in the mitigation measures as published in the Environmental Impact Report and underlines show additions. Impacts and mitigation measures are for Additional Housing Alternative A, which is the County Recommended GUP.

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
localized increase in particulate matter.		<ul style="list-style-type: none"> • All haul trucks transporting soil, sand or other loose material off-site shall be covered; • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweepers is prohibited; • All vehicle speeds on unpaved roads shall be limited to 15 mph; • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used; • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes. Clear signage shall be provided for construction workers at all access points; • All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified visible emissions evaluator; and • Post a publicly visible sign with the telephone number and person to be contacted regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. 	<p>developed under Additional Housing Alternative A may cause wind-blown dust that could contribute PM into the local atmosphere. Implementation of the BAAQMD-identified Best Management Practices in Mitigation Measure 7A.2-2 would reduce construction effects from fugitive dust generation under Additional Housing Alternative A to a less than significant level. No additional mitigation measures are required.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-57 to 7-58</p>	
<p>Impact 7A.2-3: Additional Housing Alternative A construction would generate emissions of TACs and PM_{2.5} that could expose sensitive receptors to substantial pollutant concentrations or health risks.</p>	Significant	<p>Mitigation Measure 7A.2-3(a): <i>Health Risk Screening for Construction Projects.</i> Prior to approval of an individual project, Stanford shall conduct a project-specific health risk screening using the screening distances presented in Table 7A.2-2 of the <u>EIR</u> and submit it to the <u>County Planning Office Director</u> for peer review and approval. If the individual project is located further from sensitive receptors than the minimum distance identified in Table 7A.2-2 of the <u>EIR</u>, then no further construction health risk assessment or additional mitigation is required. If the construction project is closer than the specified minimum distance, then a project-specific Health Risk Assessment shall be prepared, as outlined in Mitigation Measure 7A.2-3(b).</p> <p>Mitigation Measure 7A.2-3(b): <i>Project-Specific Health Risk Analysis.</i> If the screening criteria in Table 7A.2-2 of the <u>EIR</u> are not met, Stanford shall prepare and submit to the <u>County Planning Office Director</u> for peer review and approval a project-</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.2-3(a)-(b) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, emissions from construction equipment during site preparation activities would include directly emitted particulate matter (PM_{2.5} and PM₁₀) and TACs such as diesel particulate matter (DPM), which could expose sensitive receptors to substantial pollutant concentrations of TACs, resulting in a localized health risk. Implementation of Mitigation Measure 7A.2-3(a) would require Stanford to conduct a health risk screening of individual projects developed under the proposed 2018 General Use Permit. If applicable, Mitigation Measure 7A.2-3(b) would require a project-specific health risk analysis to demonstrate that the project construction activities would not result in a</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		specific health risk analysis demonstrating that project construction activities will not result in a significant acute, chronic non-cancer or cancer-related health risk to sensitive receptors. As a performance standard, any subsequent project-specific health risk analysis must demonstrate an excess cancer risk level of 10-in-1 million or less, a non-cancer (i.e., chronic or acute) hazard index of 1.0 or less, and an incremental increase an annual average PM _{2.5} concentration of no more than 0.3 microgram per cubic meter.	significant acute, chronic non-cancer or cancer-related health risk to specific sensitive receptors. Implementation of Mitigation Measure 7A.2-3(a)-(b) would ensure potential exposure of sensitive receptors to substantial pollutant concentrations or health risk from construction activities under the Additional Housing Alternative A would be less than significant . No additional mitigation measures are required. Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-58 to 7-60	
Impact 7A.2-4: Additional Housing Alternative A operational emissions from new development would result in emissions of criteria air pollutants (PM ₁₀) at levels that would violate an air quality standard, contribute to an existing or projected air quality violation, and result in a cumulatively considerable net increase in criteria air pollutants.	Significant	Mitigation: Implement Mitigation Measure 7A.15-2.	Finding: The Board finds that Additional Housing Alternative A's contribution to net increases in cumulative emissions of PM ₁₀ would be significant and unavoidable . Mitigation 7A.15-2 would serve to reduce mobile emissions to the extent the No Net New Commute Trips standard is achieved. However, because it is uncertain whether this measure would reduce mobile PM ₁₀ emissions below the significance threshold, the impact would remain significant and unavoidable. There are no additional feasible mitigation measures beyond those identified in the FEIR that would avoid or further reduce this impact. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations. Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would generate operational emissions from a variety of sources, including new vehicle trips, operation of boilers, maintenance operation of diesel emergency generators; new laboratories; fueling stations; and off-road sources from Stanford maintenance equipment and construction activities. Mitigation Measure 7A.15-2 would reduce mobile emissions to the extent the No Net New Commute Trips standard is achieved. However, since Additional Housing Alternative A would shift a substantial number of commute trips to residential trips, the No Net New Commute Trips Stanford may not be achieved because travel demand management (TDM) measures are not as effective in reducing residential trips, compared to commute trips. As a result, the impact remains significant and unavoidable. Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-60 to 7-63	Significant and Unavoidable
Impact 7A.2-5: Additional Housing Alternative A operation of development would	Significant	Mitigation Measure 7A.2-5: Laboratory Fume Hood Emission Control. For any individual project that contains more than 25,000 square feet of emissions-generating laboratory space within a building and 50 fume hoods, Stanford shall conduct a health risk screening analysis and obtain a permit from the	Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
generate emissions of TACs and PM _{2.5} that could expose sensitive receptors to substantial pollutant concentrations or health risks.		BAAQMD for the proposed individual project; this permit may be required either prior to or as a condition of approval of the proposed individual project. In accordance with BAAQMD Rules 2-1 and 2-5, new sources of emissions must implement Best Available Control Technology for Toxics (T-BACT) if individual source risks exceed 1.0 in a million for cancer and/or chronic hazard index is greater than 0.20. Additionally, a permit will be denied if project cancer risk exceeds 10.0 in a million or if the chronic or acute hazard index exceeds 1.0. Compliance with BAAQMD rules will ensure that new laboratory operations will not result in a significant health risk impact.	identified in the Final EIR. Specifically, Mitigation Measure 7A.2-5 is feasible and is adopted to reduce this impact to less-than-significant . Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would result in development that would generate operational emissions of TACs and localized contributions to PM _{2.5} concentrations from laboratory fume hood stacks. Implementation of Mitigation Measure 7A.2-5 would require any individual projects containing more than 25,000 square feet of laboratory space and 50 fume hoods to conduct a health risk screening analysis and obtain a permit from BAAQMD. These measures would ensure that substantial amounts of laboratory space under Additional Housing Alternative A would not result in a significant health risk. No additional mitigation measures are required. Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-63 to 7-65	
Impact 7A.2-8: Additional Housing Alternative A operation of development could conflict with or obstruct implementation of the applicable air quality plan.	Significant	Mitigation: Implement the following mitigation measures: Mitigation Measure 7A.15-2: <i>Mitigation either through a program of “no net new commute trips” or through the contribution of fair share fees for the cost of improvements to fund transportation mitigation efforts.</i> Mitigation Measures 7A.3-8(a)-(b): <i>Mitigation for native oak woodland.</i> Mitigation Measure 7A.3-9(a)-(c): <i>Mitigation for wetlands.</i> Mitigation Measure 7A.3-11(a)-(c): <i>Mitigation for protected trees.</i>	Finding: The Board finds that Additional Housing Alternative A’s conflict with implementation of the 2017 Clean Air Plan would be significant and unavoidable . Mitigation Measures 7A.15-2, 7A.3-8(a)-(b), 7A.3-9(a)-(c), and 7A.3-11(a)-(c) would reduce Additional Housing Alternative A’s potential inconsistencies with respect to the absence of several control measures of the 2017 Clean Air Plan. However, Mitigation Measure 7A.15-2 would not address Additional Housing Alternative A’s inconsistency with the Clean Air Plan’s goal of attaining the state air quality standards, because the No Net New Commute Trips standard in Mitigation Measure 7A.15-2 may not be achieved for Additional Housing Alternative A. There are no additional feasible mitigation measures beyond those identified in the FEIR that would avoid or further reduce this impact. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A’s benefits as set forth in the Statement of Overriding Considerations. Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Significant PM ₁₀ emissions associated with Additional Housing Alternative A would be the result of regional increases in VMT which could only be addressed through trip reduction measures. As discussed in Mitigation Measure 7A.15-2, Stanford would mitigate the transportation impacts of its additional development and population growth either through a program of “no net new commute trips” or through the contribution of funding equivalent to Stanford’s fair share of the cost of improvements for adversely affected intersections, the former of which has the potential to reduce VMT. However, as discussed under the description of Additional Housing Alternative A, the No Net New	Significant and Unavoidable

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
			<p>Commute Trips standard may not be achieved for Additional Housing Alternative A through travel demand management (TDM) measures as TDM measures would not be as effective in reducing residential trips associated with Additional Housing Alternative A, compared to commute trips. Consequently, the PM₁₀ impact under Additional Housing Alternative A is conservatively identified as significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-66 to 7-68</p>	
<p>Impact 7A.2-9: Additional Housing Alternative A would not result in emissions of NO_x, PM_{2.5}, or ROG_s that are cumulatively considerable, but would result in emissions of PM₁₀ that would be cumulatively considerable.</p>	Significant	<p>Mitigation: Implement the following mitigation measure: Mitigation Measure 7A.15-2: <i>Mitigation either through a program of “no net new commute trips” or through the contribution of funding equivalent to Stanford’s fair share of the cost of improvements to fund transportation mitigation efforts.</i></p>	<p>Finding: The Board finds that Additional Housing Alternative A’s contribution to cumulative emissions of PM₁₀ would be significant and unavoidable. The No Net New Commute Trips standard in Mitigation Measure 7A.15-2 may not be achieved for Additional Housing Alternative A. Consequently, the PM₁₀ impact under Additional Housing Alternative A is conservatively identified as significant and unavoidable. There are no additional feasible mitigation measures beyond those identified in the FEIR that would avoid or further reduce this impact.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A’s benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, significant PM₁₀ emissions associated with Additional Housing Alternative A would be the result of regional increases in VMT which could only be addressed through trip reduction measures. As discussed in Mitigation Measure 7A.15-2 in the Transportation and Traffic section, Stanford would mitigate the transportation impacts of its additional development and population growth either through a program of “no net new commute trips” or through the contribution of funding equivalent to Stanford’s fair share of the cost of improvements for adversely affected intersections, the former of which has the potential to reduce VMT. However, as discussed under the description of Additional Housing Alternative A, the No Net New Commute Trips standard may not be achieved for Additional Housing Alternative A through travel demand management (TDM) measures as TDM measures would not be as effective in reducing residential trips associated with Additional Housing Alternative A, compared to commute trips. Consequently, the PM₁₀ impact under Additional Housing Alternative A is conservatively identified as significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-68 to 7-69</p>	Significant and Unavoidable
<p>Impact 7A.2-10: Additional Housing Alternative A could</p>	Significant	<p>Mitigation: Implement the following mitigation measures: Mitigation Measure 7A.2-3(a)-(b): <i>Mitigation for Construction TACs and PM_{2.5}</i></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
considerably contribute to cumulative emissions of TACs and PM _{2.5} that could expose sensitive receptors to substantial pollutant concentrations or health risks.		Mitigation Measure 7A.2-5: <i>Laboratory Fume Hood Emission Control</i>	identified in the Final EIR. Specifically, Mitigation Measures 7A.2-3(a)-(b) and 7A.2-5 are feasible and are adopted to reduce this impact to less-than-significant . Rationale for Finding: As discussed above under Impact 7A.2-3, Additional Housing Alternative A could result in a significant health risk impact; and as discussed in Impact 7A.2-5, the health risks from TACs from operation of laboratories under Additional Housing Alternative A are also considered significant. These represent impacts where the contribution of Additional Housing Alternative A could also be cumulatively considerable. However, the implementation of Mitigation Measures 7A.2-3(a)-(b) and 7A.2-5 would mitigate Additional Housing Alternative A's contribution to cumulative health risk impacts to a less than significant level. No additional mitigation measures are required. Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-69 to 7-70	
Biological Resources				
Impact 7A.3-1: Additional Housing Alternative A activities could result in adverse effects on special-status and migratory birds.	Potentially Significant	Mitigation Measure 7A.3-1(a): <i>Avoid tree removal and commencement of outdoor construction activities during nesting season.</i> Tree removal or pruning associated with project construction and commencement of outdoor project construction activities shall be avoided from February 1 through August 31, the primary local bird nesting season, to the extent feasible. If no tree removal or pruning associated with project construction is proposed during the nesting period and outdoor project construction activities will commence outside the nesting period, no surveys for active bird nests are required. <u>If Stanford proposes to initiate construction during the February 1 to August 31 nesting season, it shall notify the County.</u> Mitigation Measure 7A.3-1(b): <i>Survey for active bird nests within 250 feet of construction sites.</i> If the <u>County Planning Office Director</u> determines that compliance with Mitigation Measure 5.3-1(a) is not feasible because the timing of a construction project necessitates construction-related tree removal/pruning during the nesting season and/or commencement of outdoor construction activities during the nesting season, within seven days prior to the proposed start of construction activities an independent, qualified biologist approved by the County shall conduct a nesting bird survey of all potential habitat at the construction site and within 250 feet of the perimeter of the construction site. The survey results shall be provided to the <u>County Planning Office Director</u> prior to issuance of site demolition, grading or building permits. Mitigation Measure 7A.3-1(c): <i>Minimize impacts to active bird nests.</i> If any active nests are detected during the pre-construction survey, an independent, qualified biologist approved	Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-1(a)-(e) is feasible and is adopted to reduce this impact to less-than-significant . Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities associated with Additional Housing Alternative A could result in significant impacts to special-status and migratory birds. Mitigation measures identified for Additional Housing Alternative A would reduce impacts of construction on nesting birds, including raptors and other migratory bird species protected by the MBTA, to a level that is less than significant. If Mitigation Measure 7A.3-1(a) is implemented, no further mitigation measures are required. In the event that Mitigation Measure 7A.3-1(a) cannot feasibly be implemented, then implementation of Mitigation Measures 7A.3-1(b) through (e) would reduce this impact to a less-than-significant level Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-70 to 7-71	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>by the County shall recommend a work-exclusion buffer zone that shall be designated around the active nest to allow for both the successful fledging of the birds and initiation of work on some portions of the project site. The work-exclusion zone(s) shall be reviewed and approved by the <u>County Planning Office Director</u> prior to commencement of construction. A qualified biologist shall monitor any occupied nest located within a protective buffer zone in order to determine if the designated buffer zone is effective and when the buffer zone is no longer needed. If the buffer zone is determined to be ineffective, its size shall be increased until it is effective, or work shall cease until the young have fledged and are independent of the nest.</p> <p>Mitigation Measure 7A.3-1(d): Delay activity. If no sufficient work-exclusion zone(s) are possible, then there shall be a delay in the start of construction until the active nest is no longer occupied. A qualified biologist <u>approved by the County</u> shall monitor any occupied nest to determine when the nest is no longer used.</p> <p>Mitigation Measure 7A.3-1(e): Remove nest starts. A qualified biologist <u>approved by the County</u> can visit project sites at any time prior to tree removal or the initiation of outdoor construction work in order to find and remove nest starts. <u>Nest starts are defined as nests</u> which do not have eggs or nestlings present. This activity will minimize impacts to birds as they will generally move elsewhere and restart their nest building process.</p>		
<p>Impact 7A.3-2: Additional Housing Alternative A activities could result in adverse effects on special-status bats.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-2(a): Conduct pre-project survey. Prior to project construction, an independent, qualified bat biologist approved by the County shall conduct a pre-construction survey for roosting bats in trees to be removed or pruned and structures to be demolished within the work area and within a 50-foot radius of the work area. The survey results shall be provided to the <u>County Planning Office Director</u> prior to issuance of site demolition, grading or building permits. If no roosting bats are found, no further action is required. If a bat roost is found, Stanford shall implement the following measures to avoid impacts on roosting bats.</p> <p>Mitigation Measure 7A.3-2(b): Evict non-maternal roosts. If a non-maternal roost of bats is found in a tree or structure to be removed or demolished as part of project construction, the individuals shall be safely evicted, under the direction of a qualified bat biologist, by opening the roosting area to allow airflow through the cavity. Removal or demolition should occur no sooner than at least two nights after the initial minor site modification (to alter airflow). This action allows bats to leave during darkness, thus increasing their chance of finding new</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-2(a)-(d) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities under Additional Housing Alternative A could result in significant impacts to special-status bats. Mitigation measures identified for Additional Housing Alternative A would reduce construction impacts on special-status bats to a level that is less than significant. If Mitigation Measure 7A.3-2(a) is implemented, and no roosting bats are identified, no further mitigation measures are required. In the event that Mitigation Measure 7A.3-2(a) identifies roosting bats, then implementation of Mitigation Measures 7A.3-2(b), (c), and/or (d) would reduce this impact to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-71 to 7-73</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>roosts with a minimum of disturbance. Departure of the bats from the construction area shall be confirmed with a follow-up survey by a qualified bat biologist prior to start of construction.</p> <p>Mitigation Measure 7A.3-2(c): <i>Avoid maternal roosting areas.</i> If active maternity roosts are found in trees or structures that will be removed or demolished as part of project construction, tree removal or demolition of that structure shall commence and be completed before maternity colonies form (generally before March 1) or shall not commence until after young are flying (generally after July 31). Active maternal roosts shall not be disturbed.</p> <p>Mitigation Measure 7A.3-2(d): <i>Develop and employ bat nest box plan.</i> If special-status bats are found in trees or structures to be removed or demolished as part of project construction, Stanford shall develop and implement a Bat Nest Box Plan for the Stanford campus employing current bat nest box technology. The design and placement of nest boxes shall be reviewed <u>and approved by an independent, qualified bat biologist approved by the County</u>, and shall be consistent with Stanford's anticipated long-term planning and development activities.</p>		
<p>Impact 7A.3-3: Additional Housing Alternative A activities could result in adverse effects on the San Francisco dusky-footed woodrat.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-3(a): <i>Surveys.</i> Prior to any clearing of vegetation within the Lathrop Development District, Lagunita and adjacent uplands (see Figure 5 of the Conditions), jurisdictional waterways/wetlands, or lands on the Project site outside the Academic Growth Boundary, an independent, qualified biologist approved by the County shall conduct a survey for San Francisco dusky-footed woodrat nests within the project area. The survey results shall be provided to the <u>County Planning Office Director for approval</u> prior to issuance of site demolition, grading or building permits.</p> <p>Mitigation Measure 7A.3-3(b): <i>Avoidance.</i> Where feasible, an exclusion buffer of at least 10 feet from these nests shall be established and clearly demarcated to avoid moving or bumping the nests or the logs or branches on which the nests rest.</p> <p>Mitigation Measure 7A.3-3(c): <i>Mitigation.</i> If establishing a buffer and avoiding the nests is not feasible, the nests shall be dismantled and the nesting material moved to a new location outside the project's impact areas so that it can be used by woodrats to construct new nests. Prior to nest deconstruction, each active nest shall be disturbed by a qualified wildlife biologist <u>approved by the County</u>, to the degree that all woodrats leave the nest and seek cover out of the impact area. Whether the nest is on the ground or in a tree, the nest shall be slightly disturbed (nudged) to cause the woodrats to flee. For tree nests, a tarp shall be placed below the nest and the nest dismantled</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-3(a)-(c) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities associated with Additional Housing Alternative A could result in significant impacts to San Francisco dusky-footed woodrat. Mitigation measures identified for Additional Housing Alternative A would reduce the impacts of construction to San Francisco dusky-footed woodrats to a level that is less than significant. If Mitigation Measure 7A.3-3(a) is implemented, and no San Francisco dusky-footed woodrat nests are identified, no further mitigation measures are required. In the event that Mitigation Measure 7A.3-2(a) identifies active nests, then implementation of Mitigation Measures 7A.3-2(b) and/or (c) would reduce this impact to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-73 to 7-74</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		using hand tools (either from the ground or from a lift). The nest material shall then be piled at the base of a nearby tree or large shrub outside of the impact area.		
<p>Impact 7A.3-4: Additional Housing Alternative A construction activities could result in adverse effects on special-status plant species.</p>	Potentially Significant	<p>Mitigation Measure 7A.3-4(a): <i>Surveys.</i> If construction is proposed within any jurisdictional waterways/wetland areas, Lagunita basin and adjacent uplands (see Figure 5 of the Conditions), the Lathrop Development District, or Project site lands outside the Academic Growth Boundary, an independent, qualified biologist approved by the County shall conduct a focused survey for special-status plant species prior to ground disturbance during the late winter/early spring period when most local native plant species are flowering and most easily identified. The survey results shall be provided to the <u>County Planning Office Director</u> prior to issuance of site demolition, grading or building permits. If special status plant surveying during flowering period is not possible, development within sensitive habitat areas shall be avoided unless approved by <u>California Department of Fish and Wildlife (CDFW)</u> and the <u>County Planning Office Director</u>.</p> <p>Mitigation Measure 7A.3-4(b): <i>Avoidance.</i> Construction activities shall avoid impacts to special-status plant species by establishing a buffer zone around the individuals in question. The buffer size shall be determined by an independent, qualified biologist approved by the County in order to avoid potential disturbance. The width of the buffer shall depend on a consideration of site-specific characteristics, including the plant's ecological requirements (e.g., sunlight, moisture, shade tolerance, soils, physical and chemical characteristics) and adjacent uses (e.g., sprinkler irrigation or shading from buildings or other structures). The buffer zone shall be clearly demarcated using exclusion fencing.</p> <p>Mitigation Measure 7A.3-4(c): <i>Mitigation if avoidance is not feasible.</i> If the <u>County Planning Office Director</u> determines that establishing an avoidance buffer is not feasible, individual plants (including seeds) shall be transplanted to an area with suitable physical and biological conditions on the Project site outside of the Academic Growth Boundary and monitored and adaptively managed for five years. Transplantation may be accomplished by relocating individual plants or through seed collection and dispersal, or a combination of both, to be determined based on the species. <u>Prior to construction within any area containing special-status plant species, Stanford shall submit a mitigation plan to the satisfaction of the Director identifying planting methods, performance standards, and monitoring periods and protocols.</u></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-4(a)-(c) is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities under Additional Housing Alternative A could result in significant impacts to special-status plant species. Mitigation measures identified for Additional Housing Alternative A, would reduce impacts to special-status plant species to a level that is less-than-significant. If Mitigation Measure 7A.3-4(a) is implemented, and no special-status plant species are identified, no further mitigation measures are required. In the event that Mitigation Measure 7A.3-4(a) identifies such species, then implementation of Mitigation Measures 7A.3-4(b) and/or (c) would reduce this impact to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-74 to 7-75</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>Impact 7A.3-6: Additional Housing Alternative A activities could result in significant effects on steelhead.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-6(a): <i>Habitat avoidance.</i> Grading or ground-disturbing activities within 150 feet of the top of bank of a creek that supports steelhead shall be avoided. <u>The EIR indicates that the steelhead are present in the San Francisco Creek system.</u></p> <p>Mitigation Measure 7A.3-6(b): <i>Protective measures.</i> If the <u>County Planning Office Director</u> determines that avoidance of steelhead habitat is not feasible, Stanford shall obtain any required permits and approvals from federal and state wildlife agencies, <u>as determined by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, as well as</u> including a Streambed Alteration Agreement. Such permits and approvals shall specify the conditions under which construction activities may occur, including any applicable construction windows, installation of coffer dams or other measures necessary to protect steelhead. <u>Permits and approvals from wildlife agencies (or documentation that permits are not required) shall be submitted to the satisfaction of the Director prior to issuance of any construction permits.</u></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-6(a)-(b) is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities under Additional Housing Alternative A could have a significant impact on steelhead. Mitigation measures identified for Additional Housing Alternative A would serve to further ensure that impacts to steelhead would be reduced to a level that is less-than-significant. If Mitigation Measure 7A.3-6(a) is implemented, and no work is conducted within 150 feet of top of bank of a creek, no further mitigation measures are required. In the event that implementation of Mitigation Measure 7A.3-6(a) is infeasible, then implementation of Mitigation Measures 7A.3-6(b) would reduce the significance of this impact under Additional Housing Alternative A to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-75 to 7-76</p>	<p>Less-than-Significant</p>
<p>Impact 7A.3-7: Additional Housing Alternative A activities could result in substantial loss or degradation of riparian habitat.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-7(a): Grading or ground-disturbing activities within 150 feet of riparian habitat shall be avoided.</p> <p>Mitigation Measure 7A.3-7(b): If the <u>County Planning Office Director</u> determines that avoidance is not feasible, Stanford shall obtain all appropriate permits for wetland or other work within the riparian area from the <u>Army Corps of Engineers Corps, US Fish and Wildlife Service FWS, National Oceanic and Atmospheric Administration MFS and California Department of Fish and Wildlife DFW.</u> As specified by agency permits, any riparian habitat areas lost as a result of project development would be replaced through the creation, preservation or restoration of equivalent habitat at an appropriate mitigation ratio or through other measures that the <u>as approved by the wildlife regulatory agencies listed above, deem appropriate and approve in order to adequately mitigate the impact.</u></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-7(a)-(b) is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, potential construction activities within riparian habitats on the Project site outside the Academic Growth Boundary could result in a significant impact to riparian habitat. Mitigation measures identified for Additional Housing Alternative A would mitigate impacts to riparian habitat to less-than-significant levels. If Mitigation Measure 7A.3-7(a) is implemented, and no work is conducted within 150 feet of riparian habitat, no further mitigation measures are required. In the event that implementation of Mitigation Measure 7A.3-7(a) is infeasible, then implementation of Mitigation Measures 7A.3-7(b) would reduce the significance of this impact to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-76 to 7-77</p>	<p>Less-than-Significant</p>
<p>Impact 7A.3-8: Additional Housing Alternative A activities could result in the loss of native oak woodland habitat.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-8(a): Prior to oak tree removal within the Lathrop Development District, a tree removal plan and arborist report shall be submitted which identifies the species type, acreage, diameter, and amount of canopy of oak trees proposed for removal. The arborist report shall be prepared by an I.S.A. Certified Arborist, Registered Professional Forester, or another professional approved by the <u>County Planning Office.</u></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-8(a)-(b) is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, potential removal of oaks within the oak woodland/savannah community as a result of development and/or</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>Mitigation Measure 7A.3-8(b): If the proposed oak tree removal would result in a decrease of 0.5-acre or more of native oak canopy on the project site, at least two of the following three mitigation measures shall be implemented:</p> <p>1) <i>Planting Replacement of Oak Trees.</i> Pursuant to Public Resources Code Section 21083.4, the planting of oaks shall not fulfill more than 50 percent of the mitigation requirement for the project.</p> <p>Tree replacement can be dependent upon the size of the canopy of the removed trees, the number of trees to be removed, the size of trees to be removed, the type of trees to be removed, the steepness of the slope on which trees will be removed, or the amount of room on a parcel in which trees can be planted. The objective of tree planting shall be to restore former oak woodland at a ratio of 2:1 or 3:1 based on the condition of the oak woodland habitat. 2:1 restoration is recommended for medium quality oak woodland habitat, and 3:1 restoration is recommended for high quality oak woodland habitat.</p> <p>The following standard mitigation ratios shall be used, unless a different <u>higher</u> ratio is applied by the <u>Planning Office Director</u> based on site-specific characteristics:</p> <ul style="list-style-type: none"> • For the removal of one small tree (5-18 inches): two 24-inch boxed trees or three 15 gallon trees. • For the removal of 1 medium tree (18-24 inches): three 24-inch boxed trees or four 15 gallon trees. • For the removal of a tree larger than 24 inches: four 24-inch boxed trees or five 15 gallon trees. <p>All tree replacement shall be with in-kind species, unless alternate species are approved by the <u>County</u>. A Tree Planting and Maintenance Plan shall be submitted <u>for approval by the Director</u> showing species, size, spacing and location of plantings and the location and species of established vegetation. Tree plantings shall be monitored for five years following planting and a survival rate of 75% will be required. Should the planted trees fail to meet the established performance and survival criteria, Stanford shall be responsible for additional plantings and management activities necessary to ensure the long-term success of planted mitigation trees. <u>Additional tree plantings necessary to achieve the required survival rate shall be subject to a five-year monitoring period from the date of planting.</u></p>	<p>infrastructure improvements in the Lathrop Development District, or necessary infrastructure improvements that may occur outside the Academic Growth Boundary, would have the potential to result in a significant direct impact to oak woodland. Mitigation measures identified for Additional Housing Alternative A, which are modeled on the Planning Office Guide to Evaluating Oak Woodlands Impacts, would reduce impacts to oak woodlands to a level that is less-than-significant.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-77 to 7-79</p>	

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>2) <i>Conservation Easement.</i> Protect existing native oak trees on or off the project site from future development through a conservation easement or fee title dedication to the County or a land conservation group approved by the County.</p> <p>Oak woodland offered as mitigation must be configured in such a manner as to best preserve the integrity of the oak ecosystem and minimize the ratio of edge to area. Priority should be given to conserving oak habitat adjacent to existing woodlands under conservation easements, public lands or open space lands. The protection of existing oak woodlands through conservation easements shall mitigate for the loss of oaks at a ratio equal to 2:1 (for medium quality oak woodland habitat) or 3:1 (for high quality oak woodland habitat) as determined by the <u>County Planning Office Director</u>. Land proposed as mitigation, when viewed with adjacent protected conservation land, should not result in conserved parcels of less than one acre.</p> <p>3) <i>Other Options.</i> If the <u>County Planning Office Director</u> determines that there are no feasible sites for oak woodland mitigation on Stanford lands, then Stanford shall submit a plan for review and approval by the <u>County Planning Office Director</u> that provides for the conservation of oak woodlands elsewhere in Santa Clara County in the same manner as 7A.3-8(b)(2).</p> <p>This plan must include protection of an existing oak ecosystem through a conservation easement or fee title dedication to the County or other local agency or organization responsible for the oak woodlands preservation.</p>		
<p>Impact 7A.3-9: Additional Housing Alternative A construction activities could result in substantial adverse effects on jurisdictional waters and wetlands.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-9(a): <i>Jurisdictional waters and wetland identification.</i> Stanford has provided a wetland delineation that covers the lands within the Academic Growth Boundary. Prior to grading or ground-disturbing activities on lands outside the Academic Growth Boundary, the County shall determine whether the existing wetland delineation is adequate to assess the project's impacts and, if not, an independent, qualified wetland biologist approved by the County shall delineate jurisdictional waters or wetlands on and within 250 feet of the construction site.</p> <p>Mitigation Measure 7A.3-9(b): <i>Jurisdictional waters and wetlands avoidance.</i> For all projects, grading or ground-disturbing activities within 250 feet of jurisdictional waters or wetlands shall be avoided unless the <u>County Planning Office Director</u> determines that avoidance is not feasible.</p> <p>Mitigation Measure 7A.3-9(c): <i>Jurisdictional waters or wetland replacement.</i> If the <u>County Planning Office Director</u> determines</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-9(a)-(c) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction activities under Additional Housing Alternative A could result in significant impacts to jurisdictional waters and wetlands. The mitigation measures identified for Additional Housing Alternative A would mitigate impacts to jurisdictional waters and wetlands to less-than-significant levels.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-79 to 7-80</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>that avoidance of jurisdictional waters or wetlands is not feasible, Stanford shall obtain all <u>applicable appropriate</u> permits or approval for work in jurisdictional waters (i.e., Waters of the State or Waters of the U.S.), from applicable <u>regulatory agencies</u>, including but not necessarily limited to, the U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and California State Department of Fish and Wildlife <u>and U.S. Fish and Wildlife Service</u>. Any jurisdictional waters or wetlands that are filled as a result of project development shall be replaced through the creation, preservation or restoration of jurisdictional waters or wetlands or through other measures that the agencies deem appropriate through permit requirements to adequately mitigate the impact. <u>Permits and approvals (or documentation that permits are not required) shall be submitted for approval by the Director prior to the issuance of any construction permits.</u> Potential measures may include the following:</p> <ul style="list-style-type: none"> • For creek projects, remove hardscape features from the stream channel and stream banks. • Stabilize exposed slopes or streambanks immediately upon completion of construction activities. • To restore disturbed aquatic sites, a wetland mitigation and monitoring plan will be prepared that outlines the objectives to mitigate for construction impacts. At a minimum the plan will include thresholds of replanting success (e.g., 90 percent plant survival after one year, 80 percent second year, and 70 percent third year), monitoring requirements (e.g., at least once each year to confirm site stability, plant viability, and to schedule weeding, as needed), and shall specify resource agency reporting requirements. 		
<p>Impact 7A.3-11: Implementation of Additional Housing Alternative A could conflict with local Santa Clara County tree preservation ordinance.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.3-11(a): <u>Tree Preservation and Removal Ordinance. Stanford shall comply with the County's Tree Preservation and Removal Ordinance (County Ordinance Code, Division C16).</u> A "tree" is defined <u>as a woody plant having a single trunk measuring at least 37.7 inches in circumference (12 inches or more in diameter) measured at 4.5 feet above the ground or immediately below the lowest branch, whichever is lower,</u> or in the case of multi-trunk trees, a trunk size of 75.4 inches in circumference (24 inches in diameter). <u>A protected tree on the Stanford Campus is a: Any trees in the Community Plan Area, not including the R1S zoning district (see Figure 4 of the Conditions), that meet the definition of a tree are required to be maintained by the conditions of approval of the GUP, and therefore are considered protected trees. In addition, the County</u></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.3-11(a)-(b) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, notwithstanding protections provided by the County tree preservation ordinance, construction activities under Additional Housing Alternative A could result in significant impacts to protected trees. Mitigation measures identified for Additional Housing Alternative A would ensure compliance with the County's tree preservation ordinance.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-81 to 7-82.</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p><u>Ordinance Code defines a protected tree on the Stanford campus as a:</u></p> <ul style="list-style-type: none"> • heritage tree (if included on the County’s heritage resource inventory adopted by resolution of the Board of Supervisors); • a tree planted or retained as required by conditions of approval of County permits; • and a tree located within County rights-of-way and easements. <p>Stanford shall not remove a protected tree unless:</p> <ol style="list-style-type: none"> 1. Removal of the protected tree is authorized by a County land use approval for which a grading or building permit has been issued-; 2. Removal of the protected tree is authorized by a County-issued administrative permit or encroachment permit for tree removal; or 3. Removal of the protected tree is exempt. In addition to trees removed pursuant to a County land use approval, the ordinance currently exempts removal of a protected tree in the following circumstances: <ul style="list-style-type: none"> • the tree is diseased, dead, or dying or substantially damaged from natural causes; • tree cutting is needed to remove a hazard to life and personal property; and/or • maintenance work within public utility easements <p>Mitigation Measure 7A.3-11(b): <i>Tree Replacement.</i> Issuance of a permit or approval from the County land use permit, administrative permit or encroachment permit that authorizes removal of a protected tree shall be conditioned as follows:</p> <ol style="list-style-type: none"> 1. Protected trees shall be replaced at a ratio of 3:1 for oaks and 1:1 for other protected trees; or 2. Stanford may submit a Vegetation Management Plan for the entire campus to the County Planning Office Director for review and approval. This plan must provide for the same or greater level of tree protection as the measures described in Mitigation Measure 7A.3-11(b)(1). <p><u>Compliance with the Vegetation Management Plan shall be assessed in the Annual Monitoring Report.</u></p>		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>Impact 7A.3-12: Implementation of Additional Housing Alternative A could cumulatively cause an adverse impact to biological resources.</p>	<p>Potentially Significant</p>	<p>Mitigation: Implement Mitigation Measures 7A.3-1(a)-(b), 7A.3-2(a)-(d), 7A.3-3 (a)-(c), 7A.3-4(a)-(b), 7A.3-6(a)-(c), 7A.3-7(a)-(b), 7A.3-8(a)-(b), 7A.3-9(a)-(c), and 7A.3.11(a)-(c).</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measures 7A.3-1(a)-(b), 7A.3-2(a)-(d), 7A.3-3 (a)-(c), 7A.3-4(a)-(b), 7A.3-6(a)-(c), 7A.3-7(a)-(b), 7A.3-8(a)-(b), 7A.3-9(a)-(c), and 7A.3.11(a)-(c) are feasible and are adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, implementation of Additional Housing Alternative A could cumulatively cause an adverse impact to biological resources. All biological impacts associated with construction and operation of Additional Housing Alternative A would be mitigated to a less than significant level. There are no biological impacts of Additional Housing Alternative A that, when considered in combination with other cumulative development, would make a considerable contribution to cumulative effects.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-82 to 7-84</p>	<p>Less-than-Significant</p>
<p>Cultural Resources</p>				
<p>Impact 7A.4-1: Additional Housing Alternative A development could cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.</p>	<p>Significant</p>	<p>Mitigation Measure 7A.4-1(a): <u>Survey Update.</u> The Stanford University Historic Resources Survey dated April 2017 contains an evaluation of all buildings and structures located within the Stanford Community Plan's Academic Campus land use designation that were constructed prior to 1976. Prior to 2025, Stanford shall provide to the County Planning Office for the review and approval by of the County Planning Director (or designated representative) an additional survey of structures built within the Academic Campus land use designation between 1976 and 1985 ("Survey Addendum"). At its his/her discretion, the County Planning Office Director may require a peer review of the Survey Addendum by a qualified professional (Architect with preservation experience or Architectural Historian) at Stanford's expense.</p> <p>Mitigation Measure 7A.4-1(b): <u>Demolition.</u> For any building project that involves demolition of an historical resource that is listed or has been identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey or Survey Addendum, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared as part of the CEQA environmental review of the project. Consistent with the County's process the analysis of project impacts, alternatives and mitigation will be referred to the Santa Clara County Historical Heritage Commission for its recommendation prior to approval. <u>For any building project that involves demolition of a historical resource that is listed or has</u></p>	<p>Finding: The Board finds that Additional Housing Alternative A could result in significant direct, physical impacts to historic resources and infill development, and alter the setting and surrounding environment of historic resources. The implementation of Mitigation Measure 7A.4-1(a)-(e) would reduce the impact by providing a formal framework for conditions protecting historic resources. However, if any historic buildings within the project site were demolished or altered in a manner that does not comply with the Secretary of Interior Standards under Additional Housing Alternative A, this would result in a significant and unavoidable impact to historic resources.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. There are no additional feasible mitigation measures beyond those identified in the Final EIR that would avoid or further reduce this impact. This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Implementation of Mitigation Measures 7A.4-1(a)-(e) identified for this Additional Housing Alternative A would provide a formal framework for conditions protecting historic resources. While it is considered unlikely that Stanford would demolish any of its historic buildings and structures within the Project site or alter them in a manner that does not comply with the Secretary of Interior Standards under Additional Housing Alternative A, if such actions were to occur, they</p>	<p>Significant and Unavoidable</p>

**EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS**

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation						
		<p><u>been identified as eligible for listing on the National Register of Historic Places or the County's Heritage Resource Inventory, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared by a third party hired by the County as part of the CEQA environmental review of the project.</u></p> <p>Mitigation Measure 7A.4-1(c): <i>Alteration of a Historical Resource.</i> For any proposed building project that involves remodeling, alteration, or a potential physical effect on an historical resource that is listed or identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey or Survey Addendum, Stanford shall meet the following requirements:</p> <ol style="list-style-type: none"> 1) The proposed building project shall be consistent with the <i>Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</i> (1995) ("Secretary of Interior's Standards"). Stanford shall submit documentation to the County prepared by a qualified professional to demonstrate consistency of the proposed project with the Secretary of the Interior's Standards. If the work to be performed constitutes basic maintenance, repair or replacement, Stanford shall mark the project plans with text stating: "Exterior work is limited to replacement of deteriorated materials with in-kind materials that match the old. Project plans have been reviewed by [Name of Architect], who has determined the work would comply with the Secretary of Interior's Standards." If the work to be performed is more extensive than basic maintenance repair or replacement in kind, Stanford shall submit a letter along with the project plans explaining the basis for the University Architect's Office determination that the work would comply with the Secretary of the Interior's Standards. The <u>County Planning Office Director</u> will review the marked plans or letter, and may require additional documentation. 2) The requirement that the building project must be consistent with the Secretary of the Interior's Standards shall be primarily limited to alterations to the exterior. Building interiors will be exempt from such a consistency requirement, except for interior spaces that are open to the general public on an ongoing basis. Such buildings are listed below along with their public interior spaces. <table border="1" data-bbox="520 1291 1138 1372"> <thead> <tr> <th data-bbox="520 1291 682 1372">Historic Resource</th> <th data-bbox="682 1291 945 1372">Primary public space(s) subject to review (if integrity present)</th> <th data-bbox="945 1291 1138 1372">Secondary space(s): no review required</th> </tr> </thead> <tbody> <tr> <td data-bbox="520 1372 682 1372"> </td> <td data-bbox="682 1372 945 1372"> </td> <td data-bbox="945 1372 1138 1372"> </td> </tr> </tbody> </table>	Historic Resource	Primary public space(s) subject to review (if integrity present)	Secondary space(s): no review required				<p>would result in a significant and unavoidable impact to historic resources. Pursuant to the established regulatory framework, the County would review these projects and prepare the appropriate project-specific CEQA environmental review, and if a significant impact were to be identified additional feasible mitigation for these individual projects may be identified at that time to avoid or reduce the magnitude of the significant impact. The project-specific CEQA environmental review would include an evaluation of the feasibility of preserving the historic resource.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-84 to 7-87</p>	
Historic Resource	Primary public space(s) subject to review (if integrity present)	Secondary space(s): no review required								

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures			Findings/Rationale for Finding	Significance with Mitigation
		Cantor Center/ Stanford Museum	Lobby and galleries on first and second floors of 1891 and 1902 wings	Restrooms, staff offices, collection storage areas, all basement areas and all spaces in 1999 addition		
		Memorial Church	Main sanctuary, entry vestibule, organ and choir lofts	Restrooms, offices and store rooms, all basement areas		
		Art Gallery	Vestibule and gallery space	Restrooms, offices and store rooms, all basement areas		
		Hoover Tower	Lobby, galleries, observation platform	Restrooms, offices and store rooms, all basement areas		
		Memorial Hall	Lobby, Pigott Theater, Auditorium	Restrooms, offices and store rooms, radio station		
		Frost Amphitheater	Terraces, stage	Restrooms, store rooms		
		Burnham Pavilion/ Ford Center	Lobby, main gym	Restrooms, locker rooms, offices, store rooms; all spaces in 1990 addition		
		<p>3) The County Planning Office Director may require a peer review of the Secretary of the Interior's Standards consistency analysis by a qualified professional (Architect with preservation experience or Architectural Historian) at Stanford's expense.</p> <p>4) If <u>a building project</u> it is not feasible for the building project to be consistent with the Secretary of Interior's Standards, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared as part of the CEQA environmental review. The analysis of impacts, alternatives and mitigation measures will be referred to the Santa Clara County Historical Heritage Commission for its <u>recommendation advisement</u> prior to a <u>decision by the County approval</u>.</p> <p>Mitigation Measure 7A.4-1(d): For any building project that involves demolition, modification or significant alteration of a building or structure located outside of the Academic Campus</p>				

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>land use designation that is 50 or more years old, Stanford may elect to follow the Secretary of Interior's Standards. If Stanford does not elect to follow the Secretary of Interior's Standards for such a project Stanford shall submit an assessment regarding <u>the building/structure's potential</u> its eligibility for listing on the California Register ("Eligibility Assessment") to the <u>County Planning Office Director</u>. If the <u>County Planning Office Director</u> determines that the building/structure is eligible for listing on the California Register, then Stanford shall comply with the provisions in Sections 2 and 3 above and the building/structure shall be treated as if it were identified as eligible for listing in the Stanford Historic Resources Survey or <u>Survey Addendum</u> for purposes of those Sections. The <u>County Planning Office Director</u> may require a peer review of the Eligibility Assessment by a qualified professional (Architect or Architectural Historian) at Stanford's expense.</p> <p>Mitigation Measure 7A.4-1(e): Proposed new buildings <u>projects</u> located within 75 feet of an historic resource that <u>are</u> is identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey, Survey Addendum or Eligibility Assessment, measured from the nearest exterior walls, shall be reviewed by the University Architect to ensure that the design does not negatively impact the historic resources surrounding it. Stanford shall prepare design guidelines and submit a letter to the <u>County Planning Office Director</u> confirming that the new building construction has been reviewed by the University Architect's Office <u>or other qualified professional</u> and is compatible with any historic resources located within 75 feet of the proposed new building. The <u>County Planning Director</u> (or designated representative) will review the letter prior to County approval of the new building. The <u>County Planning Office Director</u> may require a peer review of the University's <u>Architect's</u> evaluation prior to approval of the building <u>project</u>.</p>		
<p>Impact 7A.4-2: Additional Housing Alternative A development could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.4-2(a): <u>Archaeological Resources Map.</u> Stanford has provided a map to the <u>County Planning Office Director</u>, maintained as a confidential record, that shows the location of all known prehistoric and historic archaeological resources in the unincorporated Santa Clara County portion of Stanford lands. Stanford shall conduct a Record Search at the Northwest Information Center of the California Historical Resources Information System and submit an updated map each year as part of the 2018 General Use Permit annual monitoring and compliance process. This annual update will be the basis for evaluating potential impacts of future projects that include ground disturbance.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.4-2(a)-(b) is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would have the potential to result in impacts to archaeological resources. Individual projects under Additional Housing Alternative A that would require a County building permit or other County approval would be subject to conditions of approval that include specific requirements addressing archaeological resources within the Project site. Implementation of Mitigation Measure</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>At the discretion of the County Planning Office Director, project-related archaeological site assessments and monitoring shall be conducted and mitigation measures identified by either the Stanford University Archaeologist or an independent archaeologist retained by the County at Stanford's expense. All archaeological reports (including, but not limited to, site assessments, monitoring reports, Archaeological Treatment Plans) shall be forwarded to the County Planning Office Director for review at Stanford's expense. All work shall be performed by, or under the supervision of, an archaeologist that meets the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61).</p> <p>Significant impacts from projects on prehistoric and historic archaeological resources shall be addressed as specified below:</p> <ol style="list-style-type: none"> 1. If a building project is proposed on a mapped archaeological site, a qualified archaeologist shall conduct a project-specific analysis to determine whether a significant impact would occur. If the site is determined to be eligible and if there is a potentially significant impact that cannot be avoided, an Archaeological Resources Treatment Plan shall be prepared and approved by the Director prior to the commencement of ground disturbing activities. If a Stanford archaeologist performs this work, the County may at its discretion require a peer review by an independent qualified archaeologist at Stanford's expense. Project-specific mitigation, if necessary, shall be identified in accordance with the provisions of Section 21083.2 of the Public Resources Code. 2. In the event that previously unidentified historic or prehistoric archaeological resources are discovered during construction, the contractor shall cease work in the immediate area and the County Planning Office Director and University Archaeologist shall be contacted immediately. The University Archaeologist shall provide and implement <u>prepare</u> a proposed Archaeological Resources Treatment Plan for approval by the Director. At the discretion of the County Planning Director (or designated representative) an independent qualified archaeologist may be retained by the County at the expense of Stanford to assess the significance of the find and the adequacy of the proposed Archaeological Resources Treatment Plan. <u>The Director may require consultation with the Native American Heritage Commission. Stanford shall implement the approved Treatment Plan to the satisfaction of the Director.</u> 3. Archaeological monitoring shall be conducted at any time construction-related ground-disturbing activities (greater than 	<p>7A.4-2(a)-(b) identified for Additional Housing Alternative A would provide a formal framework for conditions providing protection of archaeological resources under Additional Housing Alternative A. Similarly, implementation of this mitigation measure for Additional Housing Alternative A would ensure that potential impacts to prehistoric and historic-period archaeological resources on the Project site would be reduced to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-87 to 7-89</p>	

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>12 inches in depth) are taking place within 100 feet of known archaeological resources. A technical report including the results of all monitoring activities shall be prepared once monitoring is completed in accordance with professional standards and submitted to the University Archaeologist. The archaeological monitoring shall be conducted or supervised by an individual meeting the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61).</p> <p>Mitigation Measure 7A.4-2(b): <i>Human Skeletal Remains</i>. If human skeletal remains are encountered, Stanford is required by <u>County Ordinance No. Section B6-18 of the County Ordinance Code</u> to immediately notify the County Coroner. Work shall immediately stop within a 100-foot radius of the find. If the County Coroner determines that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to Health and Safety Code Section 7050.5(c), and the County Coordinator of Indian affairs. No further disturbance of the site may be made except as authorized by the County Coroner. If artifacts are found in association with the human skeletal remains no further disturbance of the artifacts may be made until authorized by the <u>County Planning Office Director</u>. It is the responsibility of Stanford to provide for reburial of the human skeletal remains and associated artifacts following completion of the required Native American consultation process described by Health and Safety Code section 7050.5 (c) and <u>Public Resources Code Section 5097.98</u>; Stanford shall file a State Record Form (DPR Series) documenting the reburial location with the California Historical Resources Information System and provide the location on the updated map provided for in Section 3 above.</p>		
<p>Impact 7A.4-3: Additional Housing Alternative A development could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</p>	<p>Potentially Significant</p>	<p>Mitigation Measure 7A.4-3: <i>Fossilized Shell or Bone</i>. In the event that If potentially significant fossilized shell or bone is uncovered during any earth-disturbing operation, contractors shall stop work within 100 feet of the find and notify the University Archaeologist and the County Building Inspector assigned to the project. The University Archaeologist shall visit the site and make recommendations for treatment of the find (including but not limited to consultation with a paleontologist and excavation, if warranted), which shall be sent to the County Building Inspection Office and the <u>County Planning Office Director for review and approval</u>. If a fossil find is confirmed, it will be recorded with the United States Geological Survey and curated in an appropriate repository.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.4-3 is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would have the potential to result in impacts to paleontological resources during construction. Existing County policies and regulatory mechanisms provide oversight at the County level to protect significant paleontological resources within the Project site. Individual projects under Additional Housing Alternative A that would require a County building permit or other County approval would be subject to conditions of approval that include specific</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
			<p>requirements addressing paleontological resources within the Project site. Implementation of Mitigation Measure 7A.4-3 provides a formal framework for conditions providing protection of paleontological resources. Implementation of this mitigation measure would ensure that potential impacts to prehistoric and historic-period paleontological resources on the Project site for Additional Housing Alternative A would be reduced to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-89 to 7-90</p>	
<p>Impact 7A.4-4: Additional Housing Alternative A development could disturb human remains, including those interred outside of dedicated cemeteries.</p>	<p>Potentially Significant</p>	<p>Mitigation: Implement Mitigation Measure 7A.4-2(b).</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.4-2(b) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would have the potential to result in impacts to undiscovered human remains during construction. In the event that human skeletal remains are discovered during construction, implementation of Mitigation Measure 7A.4-2(b) identified for Additional Housing Alternative A requires the contractor to cease work within 100 feet and notify the County coroner. If the coroner determines that the bones are Native American, the coroner shall contact the California Native American Heritage Commission. Implementation of this mitigation measure for Additional Housing Alternative A would ensure potential impacts to human remains would be reduced to a less-than-significant level</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-90 to 7-91</p>	<p>Less-than-Significant</p>
<p>Impact 7A.4-5: Additional Housing Alternative A development could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with</p>	<p>Potentially Significant</p>	<p>Mitigation: Implement Mitigation Measure 7A.4-2(a)-(b).</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.4-2(a)-(b) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, potential impacts to archaeological sites that are considered tribal cultural resources as a result of development under Additional Housing Alternative A would be considered significant. Mitigation Measure 7A.4-2(a) identified for Additional Housing Alternative A requires that if a project is proposed within 100 feet of the location of a recorded archaeological site, at the discretion of the County Planning Office, further site-specific analysis shall be conducted to determine whether a significant impact would occur and to identify appropriate mitigation. The mitigation measure also requires archaeological monitoring for ground-disturbing activities would take place in the immediate vicinity of known archaeological resources. Additionally, in the event that a previously unidentified prehistoric archaeological resource is</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
cultural value to a California Native American tribe.			<p>discovered during construction, Mitigation Measure 7A.4-2(b) requires the contractor to cease work within 100 feet and contact the County Planning Office and University Archaeologist, and in the event that human skeletal remains are encountered, notify the County Coroner. Implementation of Mitigation Measure 7A.4-2 for Additional Housing Alternative A would ensure potential impacts to tribal cultural resources would be reduced to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-91 to 7-92</p>	
<p>Impact 7A.4-6: Additional Housing Alternative A development, in combination with past, present, existing, approved, pending and reasonably foreseeable future developments, could contribute considerably to significant cumulative adverse changes in the significance of historical resources.</p>	Potentially Significant	<p>Mitigation: Implement Mitigation Measure 7A.4-1(a)-(e).</p>	<p>Finding: The Board finds that potential impacts of Additional Housing Alternative A, when considered together with similar impacts from other probable future projects in the vicinity could result in a significant cumulative impact on historic resources. Compliance with Mitigation Measure 7A.4-1(a)-(e) would generally reduce impacts to these types of resources as a category to the extent feasible. However, demolition of historic resources would not be prohibited. Consequently, this impact remains significant and unavoidable. There are no additional feasible mitigation measures beyond those identified in the FEIR that would avoid or further reduce this impact.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, compliance with Mitigation Measure 7A.4-1(a)-(e) for Additional Housing Alternative A would require a protocol for the identification and protection of historic buildings and structures within the Project site and would generally reduce impacts to these types of resources as a category to the extent feasible. Similarly, cumulative projects located outside of the Project site that involve historic resources, would be subject to applicable regulations and environmental review requirements of those jurisdictions. While these regulations, processes, and conditions reduce impacts to historic resources both on the Stanford lands and in Santa Clara County as a whole, demolition of historic resources would not be prohibited; therefore, the cumulative impact for Additional Housing Alternative A, similar to the proposed Project, would be significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-92</p>	Significant and Unavoidable
<p>Impact 7A.4-7: Ground-disturbing activities undertaken as part of the</p>	Potentially Significant	<p>Mitigation: Implement Mitigation Measure 7A.4-2(a)-(b) and Mitigation Measure 7A.4-3.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measures 7A.4-2(a)-(b)</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>Additional Housing Alternative A could cumulatively cause a substantial adverse change in the significance of an archaeological resource, paleontological resource, or tribal cultural resource, or disturb human remains during construction.</p>			<p>and 7A.4-3 are feasible and are adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, the potential impacts of Additional Housing Alternative A when considered together with similar impacts from other probable future projects in the vicinity could result in a significant cumulative impact on cultural resources. Impacts to archeological resources, tribal cultural resources, paleontological resources, and human remains interred outside of dedicated cemeteries would be mitigated to a less-than-significant level with compliance with Mitigation Measure 7A.4-2(a)-(b) and Mitigation Measure 7A.4-3, which would require implementation of protocol to follow in the event of a discovery and the appropriate treatment of human remains as well as site-specific studies and monitoring in locations of previously recorded sites. Similarly, cumulative projects located outside of the Project site that involve archeological resources, tribal cultural resources, paleontological resources, and human remains interred outside of dedicated cemeteries, would be subject to applicable regulations and environmental review requirements of those jurisdictions. Therefore, with implementation of Mitigation Measure 7A.4-2 and Mitigation Measure 7A.4-3, Additional Housing Alternative A's contribution to cumulative impacts would not be considerable, and the impact would be less than significant.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-92 to 7-93</p>	
Greenhouse Gas Emissions				
<p>Impact 7A.7-2: Additional Housing Alternative A could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.</p>	<p>Significant</p>	<p>Mitigation: Implement the following mitigation measures:</p> <p>Mitigation Measure 7A.15-2: <i>Mitigation either through a program of "no net new commute trips" or through the contribution of fair share fees for the cost of improvements to fund transportation mitigation efforts.</i></p> <p>Mitigation Measures 7A.3-8(a)-(b): <i>Mitigation for native oak woodland.</i></p> <p>Mitigation Measure 7A.3-9(a)-(c): <i>Mitigation for wetlands.</i></p> <p>Mitigation Measure 7A.3-11(a)-(c): <i>Mitigation for protected trees.</i></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measures 7A.15-2, 7A.3-8(a)-(b), 7A.3-9(a)-(c), and 7A.3-11(a)-(c) are feasible and are adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, existing mechanisms or those included in the Additional Housing Alternative A would be consistent with most, but not all, of the relevant control measures of the 2017 Clean Air Plan. Because there are some control measures with which the Additional Housing Alternative A may not be consistent, this impact is considered significant. Where an implementation mechanism does not currently exist or is not identified in Additional Housing Alternative A, Mitigation Measures 7A.15-2, 7A.3-8(a)-(b), 7A.3-9(a)-(c), and 7A.3-11(a)-(c) would ensure its consistency with the 2017 Clean Air Plan.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-107 to 7-110</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
Hazards and Hazardous Materials				
<p>Impact 7A.8-2: Under Additional Housing Alternative A, construction projects could disturb soil and groundwater contaminated by historical hazardous material use, which could present risks the health of construction workers, the public, and/or the environment.</p>	Potentially Significant	<p>Mitigation Measure 7A.8-2(a): During construction within the Project site, any contractor shall cease any earthwork activities upon discovery of any suspect soils or groundwater (e.g., petroleum odor and/or discoloration) during construction. The contractor shall notify Stanford's Department of Environmental Health and Safety (EH&S) and the County of Santa Clara's Hazardous Materials Compliance Division (HMCD) of the Department of Environmental Health upon discovery of suspect soils or groundwater. EH&S Stanford will retain a qualified environmental firm to collect soil samples to confirm the level of contamination that may be present.</p> <p>Mitigation Measure 7A.8-2(b): If contamination is found to be present, any further proposed soil- or groundwater-disturbing activities within areas of identified or suspected contamination shall be conducted according to a site specific health and safety plan, prepared by a California state licensed professional. The contractor shall follow all procedural direction given by County HMCD and/or identified in a Soil and Groundwater Management Plan prepared for the site by a qualified environmental firm to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with transportation laws and the requirements of the licensed receiving facility (in coordination with EH&S).</p> <p>Mitigation Measure 7A.8-2(c): If contaminated soil or groundwater is encountered and identified constituents exceed human health risk levels, it shall be delineated, removed, and disposed of offsite in compliance with the overseeing agency, either County HMCD or Regional Water Quality Control Board ("RWQCB"), as well as the receiving facilities' requirements.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.8-2(a)-(c) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4., Additional Housing Alternative A would result in soil disturbance on the Project site during construction and thus, would have a corresponding greater overall potential to disturb groundwater. Under Additional Housing Alternative A, if potential disturbance occurs in areas previously contaminated by hazardous materials, construction workers, the public, and/or the environment may be exposed to a localized release of compounds considered hazardous to human health or the environment, which would be a significant impact. However, implementation of Mitigation Measure 7A.8-2(a)-(c) identified for Additional Housing Alternative A establishes protocols for construction activities that would reduce or eliminate the potential risks to public or construction worker health, or the environment, reducing this impact to a less than significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-111 to 7-112</p>	Less-than-Significant
<p>Impact 7A.8-6: New development under Additional Housing Alternative A could potentially be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, thus, could result in a safety hazard to the</p>	Potentially Significant	<p>Mitigation: Implement Mitigation Measure 7A.8-2(a)-(c).</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.8-2(a)-(c) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would have the potential to develop in areas on the campus where residual hazardous materials may be present in the soil and cause significant impacts. However, implementation of Mitigation Measures 7A.8-2(a), 7A.8-2(b), and 7A.8-2(c) would ensure that any earthwork activities that occur on the Project site that may encounter suspicious materials would be adequately addressed, and thus, the potential for residual contamination to significantly impact the public or environment would be less than significant.</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
public or environment.			Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-114	
Impact 7A.8-10: Hazards at the Additional Housing Alternative A site, in combination with past, present, and future projects could potentially contribute to cumulative hazards.	Potentially Significant	Mitigation: Implement Mitigation Measures 7A.8-2(a)-(c).	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.8-2(a)-(c) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, cumulative hazardous materials effects could occur if activities that would occur under Additional Housing Alternative A at the Project site, and other past, existing and proposed development, together, would significantly increase risks in the vicinity of the Project site. As a result of these existing regulatory requirements that apply to the Project site, and given that nearby off-site land uses would be subject to their own applicable regulations and internal standard operating procedures controlling the use, storage, and disposal of hazardous materials, the potential hazardous materials and hazard impacts would not combine to become cumulatively considerable. Implementation of Mitigation Measure 7A.8-2(a)-(c) would also reduce any contribution from Additional Housing Alternative A to potential cumulative disturbance of soil and groundwater. Given this and all the other factors discussed above, the cumulative impact of Additional Housing Alternative A to hazards and hazardous materials would be less than significant.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-116 to 7-117</p>	Less-than-Significant
Hydrology and Water Quality				
Impact 7A.9-1: Additional Housing Alternative A construction could violate water quality requirements or waste discharge requirements, or otherwise degrade water quality.	Potentially Significant	Mitigation Measure 7A.9-1: <u>Water Wells.</u> Prior to issuance of a demolition permit , or building permit, or grading permit, Stanford shall review its historic wells survey and confirm that no historic wells, not properly closed, are located <u>within</u> at the project <u>and location to determine the potential for encountering any groundwater wells within the area of proposed improvements. If a well is discovered, and if the well is no longer part of operations and was not abandoned in accordance with SCVWD requirements, Stanford shall fulfill the well abandonment/destruction permit requirements. Stanford shall contact SCVWD to locate existing inactive wells and confirm adherence to the well abandonment/ destruction requirements. Stanford shall indicate there are no existing inactive wells at the project location, or shall provide documentation that all wells on the site have been closed in conformance with a Well Destruction Permit issued by the SCVWD.</u>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.9-1 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, inactive wells, if not abandoned appropriately, can present potential conduits for contamination from the surface to underlying groundwater resources. Implementation of Mitigation Measure 7A.9-1 would require Stanford to refer to the well survey, prior to obtaining a demolition or grading permit for individual projects under Additional Housing Alternative A to ensure that there are no wells within each building site that might need to be appropriately abandoned to eliminate this pathway for contamination. Implementation of SWPPP requirements, as well as Mitigation Measure 7A.9-1, would ensure potential water quality impacts of Additional Housing Alternative A would be less than significant post-mitigation.</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>Impact 7A.9-4: Additional Housing Alternative A operation could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table.</p>	Potentially Significant	<p>Mitigation Measure 7A.9-4: <u>Groundwater Recharge. All future development projects shall achieve net positive ground water recharge. Stanford Utilities shall review individual building projects proposed under the 2018 this General Use Permit for changes in impervious surface area within the Unconfined Groundwater Zone shown on Figure 7 of the Conditions, and submit to the County for approval by the Director, an assessment of the proposed project's projected net effect on groundwater recharge. The accounting of the recharge effort Actual recharge shall be tracked on a cumulative basis to ensure verify that all future development authorized pursuant to this GUP will continue to result in an annual net positive recharge in the Unconfined Groundwater Zone. Record of monitored data shall be submitted to the County on an annual basis and Santa Clara Valley Water District ("SCVWD") and include both water volumes and water quality data. Such information shall be recorded in the Annual Report.</u></p>	<p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-118 to 7-119</p> <p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.9-4 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, increases in impervious surfaces from additional development in the Unconfined Zone could further reduce the amount of runoff that recharges into the underlying aquifer, which would be a significant impact. Mitigation Measure 7A.9-4 would require continued implementation of this groundwater recharge plan with annual reporting to the County would ensure that future development that would occur in the Unconfined Zone under Additional Housing Alternative A would not result in adverse effects to underlying groundwater levels.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-120 to 7-122</p>	Less-than-Significant
<p>Impact 7A.9-7: Additional Housing Alternative A, in combination with past, present, and future projects could potentially contribute to surface and groundwater quality impacts.</p>	Potentially Significant	<p>Mitigation: Implement Mitigation Measure 7A.9-1.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.9-1 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction and operation of the development Additional Housing Alternative A, together with past, present and other reasonably foreseeable future projects in the vicinity could cumulatively increase stormwater runoff and pollutant loading in the study watersheds. Required NPDES permits (General Construction Permit and the MS4), are based upon addressing cumulative contributions to a watershed and as a result include requirements to implement BMPs that protect water quality to the maximum extent practicable. Construction related to Additional Housing Alternative A, in combination with other cumulative development, could also affect groundwater quality. Mitigation Measure 7A.9-1 would serve to minimize any contribution from Additional Housing Alternative A to significant cumulative effects on groundwater quality, and thus, ensure this impact would be less than significant.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-124</p>	Less-than-Significant
<p>Impact 7A.9-8: Additional Housing Alternative A, in combination with past, present, and future</p>	Potentially Significant	<p>Mitigation: Implement Mitigation Measure 7A.9-4.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.9-4 is feasible and is adopted to reduce this impact to less-than-significant.</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
projects could potentially contribute to depletion in groundwater supplies or interfere with groundwater recharge.			<p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction and operation of the proposed development under Additional Housing Alternative A, together with past, present and other reasonably foreseeable future projects in the vicinity could cumulatively decrease groundwater supplies and interfere with groundwater recharge. Under Additional Housing Alternative A, Stanford would also continue implementation of the Campus-wide Plan for Groundwater Recharge, as specified in Mitigation Measure 7A.9-4, above, to ensure that any loss of recharge areas due to new development under Additional Housing Alternative A is addressed through management of Lagunita reservoir. Considering the projected use of groundwater for the alternative, the proposed landscaping vegetation, current and future management of the groundwater basin and continued adherence to the groundwater recharge plan as overseen by SCVWD, there would be a less than significant cumulative impact to groundwater levels or supplies under Additional Housing Alternative A.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-125</p>	
Noise and Vibration				
<p>Impact 7A.11-1: Additional Housing Alternative A could expose people to or generate noise levels in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies during construction.</p>	Significant	<p>Mitigation Measure 7A.11-1: Construction Noise Control Measures and Noise Control Plan for Off-Site Receptors. If construction would be within 150 feet of off-site sensitive receptors, Stanford shall employ noise attenuation measures to reduce the generation of construction noise to achieve a performance standard of 75 dBA at the affected property line of the nearest off-site single family residential receptor and 80 dBA at the affected property line of the nearest off-site multi-family residential receptor. These measures shall be described in a Noise Control Plan that shall be submitted for review and approval by the County Planning Director and Development Department prior to issuance of a building permit to ensure that construction noise is consistent with the standards set forth in the County Ordinance Code.</p> <p><u>If necessary to achieve the minimum performance standards stated above</u>, Additional measures specified in the Noise Control Plan and implemented during project construction shall include, at a minimum, the following noise control strategies:</p> <ul style="list-style-type: none"> For construction <u>within on a the</u> Project site that would be <u>within</u> 150 feet of sensitive receptors located within the City of Palo Alto, hours of construction activity shall be restricted to those established in the City of Palo Alto Noise Ordinance (i.e., between the hours of 8:00eight AM a.m. to 6:00six PM p.m. Monday through Friday, and between 9:00 nine AM a.m. and 6:00six PM p.m. on Saturday). <p>For construction <u>within on a the</u> Project site that would be <u>within</u> 150 feet of sensitive receptors located within all other</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.11-1 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4., construction closer than 150 feet from off-site receptors would have the potential to result in noise levels in excess of the County's noise standard, which would be a significant impact under Additional Housing Alternative A. In addition, if construction activities were to occur within prohibited hours (weekdays and Saturday between the hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, except for emergency work of public service utilities or by variance), it would result in a significant impact, irrespective of whether a variance is granted. Implementation of construction noise control measures and a noise control plan for off-site receptors in Mitigation Measure 7A.11-1 would ensure that construction that occurs under Additional Housing Alternative A would be consistent with the County's noise ordinance.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-129 to 7-131</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>residential areas, hours of construction activity shall be restricted to those established in the Santa Clara County Noise Ordinance (i.e., between seven a.m. and seven p.m., Monday through Saturday).</p> <ul style="list-style-type: none"> Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels to below 75 dBA; Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to approximately 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and Stationary construction noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures. <p>Emission of sound in the performance of emergency work is exempt from these requirements. In addition, variances to these restrictions may be allowed, with County approval, for certain utility work or other construction for which nighttime work would avoid secondary impacts (e.g., traffic impacts during commute periods); and where compliance with the noise thresholds is technically or economically infeasible. A variance may be granted only where the activity will not create a nuisance and will not be detrimental to the public health and safety.</p>		
<p>Impact 7A.11-2: Additional Housing Alternative A construction could result in a substantial temporary or periodic increase in ambient</p>	<p>Significant</p>	<p>Mitigation Measure 7A.11-2: <i>Construction Noise Control Measures and Noise Control Plan for On-Site Receptors.</i> For construction activities over two weeks in duration, and within 150 feet of on-site sensitive receptors, Stanford shall identify noise attenuation measures to reduce the generation of construction noise to achieve a minimum performance standard of 80 dBA, Leq over an 8-hour period at the nearest on-site residential or day care land use. These measures shall be described in a Noise Control</p>	<p>Finding: The Board finds that construction noise levels that would occur at or near the Project site boundary would be above existing ambient noise levels at off-site and on-site receptors, which would be a significant impact. Mitigation Measures 7A.11-1 and 7A.11-2 implement a performance standard to reduce the impact to off-site receptors and on-site receptors, respectively. However, given the proximity of impacted receptors, temporary or periodic increases in ambient noise in the project vicinity would remain significant, even with implementation of noise reduction</p>	<p>Significant and Unavoidable</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
noise levels in the Project site vicinity.		<p>Plan that shall be submitted for review and approval by the Director prior to issuance of a building permit to ensure that construction noise is consistent with the standards.</p> <p>If necessary to achieve the minimum performance standard stated above, measures specified in the Noise Control Plan and implemented during project construction shall include, at a minimum, the following noise control strategies:</p> <ul style="list-style-type: none"> • Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels to below 80 dBA; • Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to approximately 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and • Stationary construction noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures. 	<p>mitigation. Consequently, this impact is considered significant and unavoidable. There are no additional feasible mitigation measures beyond those identified in the FEIR that would avoid or further reduce this impact.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4. construction-related noise generated by Additional Housing Alternative A may be consistent with the standards established in the local general plan and noise ordinance assessed in Impact 7A.11-1, and still result in a substantial temporary or periodic increase in ambient noise levels. Construction noise levels that would occur at or near the Project site boundary would be 15 to 20 dBA above existing ambient noise levels at off-site sensitive receptors, and potentially higher at on-site receptors, which would be a significant impact. Mitigation Measures 7A.11-1 and 7A.11-2 provides for construction noise control measures and a noise control plan for on- and off-site receptors, and to implement a performance standard to reduce the impact to off-site receptors and on-site receptors, respectively, where it is feasible to do so. Individual projects that would occur under Additional Housing Alternative A would be subject to additional review through the County's ASA or other approval processes, and additional noise reduction measures may be imposed at that time. Nevertheless, given that the proximity of impacted receptors it is possible that temporary or periodic increases in ambient noise in the Project site vicinity would remain significant, even with implementation of noise reduction mitigation.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-131 to 7-132</p>	
Impact 7A.11-3: Additional Housing Alternative A construction could result in temporary exposure of persons to or generation of, excessive groundborne vibration or groundborne noise levels in the Project site vicinity.	Significant	<p>Mitigation Measure 7A.11-3: Construction Vibration Reduction Plan. If construction involving vibratory rollers, hoe rams, or large bulldozers is proposed within 40 feet of an historic structure, Stanford shall develop a Vibration Reduction Plan in coordination with an acoustical consultant, geotechnical engineer, and/or construction contractor, for review and approval by the <u>County Planning Director and Development Department</u>. Measures and controls shall be identified based on project-specific final design plans, and may include, but are not limited to, either or both of the following:</p> <ol style="list-style-type: none"> 1. Use of non-vibratory excavator-mounted compaction wheels and small smooth drum rollers for final compaction of asphalt 	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.11-3 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Additional Housing Alternative A would have the potential for construction groundborne vibration and noise effects by exceeding building damage and adverse human reaction thresholds, resulting in a significant impact. Implementation of Mitigation Measure 7A.11-3, which includes preparation of a construction vibration reduction plan, would</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>base and asphalt concrete. If needed to meet compaction requirements, smaller vibratory rollers <u>may</u> will be used to minimize vibration levels during repaving activities where needed to meet vibration standards.</p> <ol style="list-style-type: none"> 2. Implementation of buffers and the use of specific types of equipment to minimize vibration impacts during construction at nearby receptors in order to meet a performance standard of 0.12 inches per second PPV (<u>peak particle velocity</u>) at historic buildings and 0.3 inches per second PPV at non-historic buildings. 3. Implementation of a vibration, crack, and line and grade monitoring program for identified historic buildings located within 40 feet of construction activities, in coordination with a geotechnical engineer and qualified architectural historian. 	<p>address this impact, and ensure it would be reduced to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-133 to 7-135</p>	
<p>Impact 7A.11-4: Additional Housing Alternative A could increase long-term noise levels in the Project vicinity to levels in excess of applicable noise standards.</p>	<p>Significant</p>	<p>Mitigation Measure 7A.11-4: <i>Shield or Enclose HVAC Equipment and Emergency Generators.</i> Noise levels from mechanical equipment within 150 feet of sensitive receptors shall be minimized by proper siting and selection of such equipment and through installation of sufficient acoustical shielding or noise emission controls. An acoustical analysis shall be prepared by a qualified professional to ensure that the <u>any</u> new mechanical equipment achieves the following noise standards at the property line of an offsite sensitive land uses in Palo Alto or Menlo Park, or at the nearest on-site residential, day care or instructional classroom land use:</p> <ul style="list-style-type: none"> • The project shall not cause the average 24-hour noise level (Ldn) to increase by 5.0 dB or more in an existing residential area, even if the Ldn would remain below 60 dB; • The project shall not cause the Ldn to increase by 3.0 dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB; • The project shall not cause an increase of 3.0 dB or more in an existing residential area where the Ldn currently exceeds 60 dB. <p>Noise levels from the periodic testing of emergency generators within 150 feet of sensitive receptors in the cities of Palo Alto or Menlo Park also shall be minimized by proper siting and through installation of acoustical shielding. Scheduled testing of an emergency generator must not occur before 7:00 <u>AM</u> a.m. or after 7:00 <u>PM</u> p.m.</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.11-4 is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, increased noise from building mechanical equipment under Additional Housing Alternative A is identified as a significant impact. Implementation of Mitigation Measure 7A.11-4, which includes measures to shield or enclose HVAC equipment and emergency generators, would address this impact, and ensure it would be reduced to a less-than-significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-135 to 7-136</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>Impact 7A.11-6: Additional Housing Alternative A construction noise, in combination with past, present, existing, approved, pending and reasonably foreseeable future developments could contribute considerably to cumulative noise impacts.</p>	<p>Significant</p>	<p>Mitigation: Implement Mitigation Measure 7A.11-1, <i>Construction Noise Control Measures and Noise Control Plan for Off-Site Receptors</i>, and Mitigation Measure 7A.11-2, <i>Construction Noise Control Measures and Noise Control Plan for On-Site Receptors</i>.</p>	<p>Finding: The Board finds there could be a significant cumulative construction noise impact under Additional Housing Alternative A. Additional Housing Alternative A's contribution to cumulative construction noise impacts to off-site and on-site receptors would be reduced with Mitigation Measures 7A.11-1 and 7A.11-2, respectively. However, given the proximity of impacted receptors, construction noise impacts in the project vicinity would remain significant, even with implementation of noise reduction mitigation. Consequently, this impact is considered significant and unavoidable. There are no additional feasible mitigation measures beyond those identified in the FEIR that would avoid or further reduce this impact.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, development under Additional Housing Alternative A may be constructed during the same time and duration as cumulative projects in the area. Specifically, the SUMC Renewal Project's replacement buildings for the School of Medicine and some of that project's hospital/clinic square footage would be constructed during implementation of and overlap with Additional Housing Alternative A. Additional Housing Alternative A 's contribution to cumulative construction noise impacts to off-site and on-site receptors would be reduced with Mitigation Measure 7A.11-1 and Mitigation Measure 7A.11-2, respectively, but not to a level that is less than significant.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-138</p>	<p>Significant and Unavoidable</p>
Recreation				
<p>Impact 7A.14-1: Additional Housing Alternative A would increase use of existing neighborhood and regional parks and other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>	<p>Significant</p>	<p>Mitigation Measure 7A.14-1(a). Prior to occupancy of net new on-campus housing units/<u>beds</u> exceeding 4,425, Stanford shall provide to the City of Palo Alto a one-time contribution equivalent to the capital budget needs to provide for one-time turf replacement at Heritage Park. The amount of the contribution shall be determined by the County of Santa Clara based on an estimate from an independent contractor. The payment shall not be used for any purpose other than turf replacement at Heritage Park.</p> <p>Prior to occupancy of net new on-campus housing units/<u>beds</u> exceeding 3,150, Stanford shall provide to the City of Palo Alto a one-time contribution equivalent to the capital budget needs to provide for one-time turf replacement at neighborhood parks in</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.14-1(a)-(b) is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, the increase in campus residents that would occur under Additional Housing Alternative A would result in an increase in off-campus public park visits resulting in a significant impact to turfs at the College Terrace parks, Heritage Park, and Stanford Hills Park. Impacts related to deterioration of recreation facilities generated by Additional Housing Alternative A would be offset with implementation of Mitigation Measure</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>College Terrace (Cameron, Mayfield, Weisshaar, and Werry Parks). The amount of the contribution shall be determined by the County of Santa Clara based on an estimate from an independent contractor. The payment shall not be used for any purpose other than turf replacement at College Terrace parks.</p> <p>Mitigation Measure 7A.14-1(b). Prior to occupancy of net new on-campus housing units/beds exceeding 4,425, Stanford shall provide to the City of Menlo Park a one-time contribution equivalent to the capital budget needs to provide for one-time turf replacement at Stanford Hills Park. The amount of the contribution shall be determined by the County of Santa Clara based on an estimate from an independent contractor. The payment shall not be used for any purpose other than turf replacement at Stanford Hills Park.</p>	<p>7A.14-1(a)-(b), and thus, this impact would be reduced to less than significant.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-151 to 7-154</p>	
<p>Impact 7A.14-2: The construction of recreational facilities under Additional Housing Alternative A would cause physical effects on the environment.</p>	<p>Significant</p>	<p>Mitigation: Implement the following mitigation measures, as needed for construction of recreation facilities:</p> <p><i>Air Quality</i></p> <p>Mitigation Measure 7A.2-2: <i>Best Management Practices for Controlling Particulate Emissions during Construction.</i></p> <p>Mitigation Measure 7A.2-3(a)-(b): <i>Mitigation for Construction TACs and PM_{2.5}.</i></p> <p><i>Biological Resources</i></p> <p>Mitigation Measure 7A.3-1(a)-(e): <i>Mitigation for nesting birds during construction.</i></p> <p>Mitigation Measure 7A.3-2(a)-(d): <i>Mitigation for special-status bat species during construction.</i></p> <p>Mitigation Measure 7A.3-3(a)-(c): <i>Mitigation for San Francisco dusky-footed woodrat during construction.</i></p> <p>Mitigation Measure 7A.3-4(a)-(b): <i>Mitigation for special-status plant species during construction.</i></p> <p>Mitigation Measure 7A.3-6(a)-(c): <i>Mitigation for steelhead during construction.</i></p> <p>Mitigation Measure 7A.3-7(a)-(b): <i>Mitigation for riparian habitat during construction.</i></p> <p>Mitigation Measure 7A.3-8(a)-(b): <i>Mitigation for native oak woodland during construction.</i></p> <p>Mitigation Measure 7A.3-9(a)-(c): <i>Mitigation for wetlands during construction.</i></p> <p>Mitigation Measure 7A.3-11(a)-(c): <i>Mitigation for protected trees during construction.</i></p> <p><i>Cultural Resources</i></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measures 7A.2-2, 7A.2-3(a)-(b), 7A.3-1(a)-(e), 7A.3-2(a)-(d), 7A.3-3(a)-(c), 7A.3-4(a)-(b), 7A.3-6(a)-(c), 7A.3-7(a)-(b), 7A.3-8(a)-(b), and 7A.3-9(a)-(c), 7A.3-11(a)-(c), 7A.4-2(a)-(b), 7A.4-3, 7A.8-2(a)-(c), 7A.9-1, 7A.11-1, 7A.11-2, 7A.11-3, and 7A.15-1 are feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, the construction of new open spaces and construction of recreational amenities on the Project site would result in temporary physical effects. Since on-campus recreational improvements are part of the overall anticipated development program, the associated construction-related impacts are addressed in the construction impact analyses in the respective EIR technical sections. Implementation of Mitigation Measures 7A.2-2, 7A.2-3(a)-(b), 7A.3-1(a)-(e), 7A.3-2(a)-(d), 7A.3-3(a)-(c), 7A.3-4(a)-(b), 7A.3-6(a)-(c), 7A.3-7(a)-(b), 7A.3-8(a)-(b), and 7A.3-9(a)-(c), 7A.3-11(a)-(c), 7A.4-2(a)-(b), 7A.4-3, 7A.8-2(a)-(c), 7A.9-1, 7A.11-1, 7A.11-2, 7A.11-3, and 7A.15-1 would reduce construction related impacts on-campus park and recreation facility development to a less than significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-155</p>	<p>Less-than-Significant</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>Mitigation Measure 7A.4-2(a)-(b): <i>Mitigation for protection of archaeological resources during construction.</i></p> <p>Mitigation Measure 7A.4-3: <i>Mitigation for protection of paleontological resources during construction.</i></p> <p><i>Hazardous Materials</i></p> <p>Mitigation Measure 7A.8-2(a)-(c): <i>Mitigation for potentially contaminated soils during construction.</i></p> <p><i>Hydrology and Water Quality</i></p> <p>Mitigation Measure 7A.9-1: <i>Review historic wells survey.</i></p> <p><i>Noise and Vibration</i></p> <p>Mitigation Measure 7A.11-1: <i>Construction Noise Control Measures and Noise Control Plan for Off-Site Receptors.</i></p> <p>Mitigation Measure 7A.11-2: <i>Construction Noise Control Measures and Noise Control Plan for On-Site Receptors.</i></p> <p>Mitigation Measure 7A.11-3: <i>Construction Vibration Reduction Plan.</i></p> <p><i>Transportation and Traffic</i></p> <p>Mitigation Measure 7A.15-1: <i>Construction Traffic Control Measures.</i></p>		
<p>Impact 7A.14-3: Additional Housing Alternative A in combination with past, present, and reasonably foreseeable future projects would increase use of existing neighborhood and regional parks and other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</p>	Significant	<p>Mitigation: Implement Mitigation Measure 7A.14-1(a)-(b).</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measure 7A.14-1(a)-(b) is feasible and is adopted to reduce this impact to <i>less-than-significant</i>.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, the increased demand by the Additional Housing Alternative A on public park and recreation facilities could contribute to a significant cumulative deterioration of off-campus park and recreation facilities at the College Terrace parks, Heritage Park, and Stanford Hills Park. Implementation of Mitigation Measure 7A.14-1(a)-(b) would reduce the Stanford's contribution to a cumulative impact to a less than significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, page 7-157</p>	Less-than-Significant
Transportation and Traffic				
<p>Impact 7A.15-1: Additional Housing Alternative A would generate construction</p>	Significant	<p>Mitigation Measure 7A.15-1: <i>Construction Traffic Control Measures.</i> The following traffic control measures are required to address impacts from construction of individual General Use</p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>traffic that would cause a substantial reduction in mobility and in access to land uses.</p>		<p>Permit projects. <u>All of these items shall be included under Condition G.</u></p> <ul style="list-style-type: none"> • Protection and Maintenance of Public Transit Access and Routes. Stanford and its contractors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, during project construction without prior approval from the VTA (<u>Santa Clara Valley Transportation Authority</u>) and other affected jurisdictions. Such approvals shall require submittal of <u>improvement plans</u> and advance coordination per VTA's Bus Stop Relocation Policy of a mitigation plan to reduce transit impacts to a less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing public transit bus stops, limiting access to public transit bus stops or transfer facilities, or otherwise restricting or constraining public transit operations. • Maintenance of Pedestrian Access. Stanford and its contractors shall be prohibited from substantially limiting pedestrian access to properties or facilities during construction of the project, without prior approval from the affected jurisdictions. Such approvals shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting pedestrian access include, but are not limited to, sidewalk closures, bridge closures, crosswalk closures, pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided if determined by the County to be needed for pedestrian safety. • Maintenance of Bicycle Access. Stanford and its contractors shall be prohibited from substantially limiting bicycle access to properties or facilities during construction of the project, without prior approval from those jurisdictions. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting bicycle access include, but are not limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists. • Protection and Maintenance of Emergency Service Access and Routes. Stanford shall <u>indicate on plan</u> 	<p>identified in the Final EIR. Specifically, Mitigation Measure 7A.15-1 is feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction traffic impacts could include reduction in off-campus on-street parking; reduction in pedestrian, bicycle and public transit access; additional peak-hour traffic; use of non-truck routes by construction traffic; and interference with special events, which would be considered significant. Implementation Mitigation Measure 7A.15-1 includes construction traffic control measures that would reduce impacts of construction traffic to mobility and access to a less-than-significant level:</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-160 to 7-161</p>	

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p><u>submittals during the building permit plan check process, inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and shall designate alternate evacuation and emergency routes to maintain response times during construction periods.</u></p> <ul style="list-style-type: none"> • Parking for Construction-Related Vehicles. Stanford shall provide adequate on-campus parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the Stanford campus, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site. • Restriction on Construction Delivery Hours. Stanford shall make feasible attempts to avoid construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between 4:30 PM and 6:00 PM. • Construction Truck Routes. Stanford shall deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. Heavy construction vehicles shall be prohibited from accessing the site from routes that the Cities of Palo Alto, Menlo Park or County of San Mateo have prohibited for use by such vehicles. Stanford shall provide written notification to all contractors regarding appropriate routes to and from construction sites and the weight and speed limits for local roads used to access construction sites. A copy of all such written notifications shall be submitted to the <u>County Planning Office Director.</u> • Phone Number for Complaints. Stanford shall post at least one sign no smaller than 1,296 square inches (<u>e.g. 3 ft. x 3 ft.</u>) at all active construction sites. The sign shall contain the name, telephone number and e-mail address of the appropriate Stanford person <u>and the County Planning Department phone number, as determined by the Department</u> that the public may contact to report alleged violations of this mitigation measure or to register complaints about construction traffic associated with building projects under the 2018 General Use Permit. Stanford shall keep a written record of all such complaints and shall provide copies of these records to the <u>County Planning Office Director</u> as part of the annual report process. 		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>Construction Impact Mitigation Plan. In lieu of the above mitigation measures, Stanford may submit a detailed construction impact mitigation plan to the County for review and approval by the Director prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. If Stanford determines that it is not feasible to comply with the "Restriction on Construction Delivery Hours" above, then the plan shall also explain the basis for this infeasibility determination. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved shall require approval by the Director.</p> <p>Construction During Special Large Events. Stanford shall prevent roadway construction activities from reducing roadway capacity during major athletic events or other special large events that attract a substantial number of visitors to the campus. This measure may require a special supplemental permit to be obtained to host such events during significant construction phases.</p>		
<p>Impact 7A.15-2(a): Implementation of Additional Housing Alternative A could increase traffic volumes at area intersections, creating adverse impacts under 2018 Baseline with Additional Housing Alternative A conditions.</p>	<p>Significant</p>	<p>Mitigation Measure 7A.15-2(a):</p> <p>Stanford shall mitigate the transportation impacts of its additional development and population growth either through a program of "no net new commute trips" or through the contribution of fair share fees for the improvements for adversely affected intersections specified in Table 1A [minus the contribution to these improvements provided pursuant to Mitigation Measure 7A.15-2(b), below], which funds shall be expended by the County to fund mitigation efforts.</p> <ol style="list-style-type: none"> As specified on page 64 and Policy C-1 of the Stanford Community Plan, the no net new commute trips standard is defined as no increase in automobile trips during peak commute times in the peak commute direction, as counted at defined cordon locations around the central campus. The peak commute period is defined as the one-hour period in the morning (AM) and afternoon (PM) with the highest volume of traffic at the cordon locations, as determined by traffic counts. The reasonable cost of all traffic counts and other work conducted for determination of compliance with this 	<p>Finding: The Board finds that the impact of Additional Housing Alternative A's increase in traffic volumes at area intersections under 2018 Baseline with Additional Housing Alternative A conditions is significant and unavoidable. Mitigation Measure 7A.15-2 would substantially reduce traffic congestion impacts to intersections. However, it is uncertain whether it would be feasible to improve some of the affected intersections if the No Net New Commute Trips standard is not achieved, if there are not sufficient additional funds to complete the intersection impacts, or if there are not sufficient off-campus projects available to reduce peak hour traffic. Since no additional feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p>	<p>Significant and Unavoidable</p>

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>mitigation measure shall be paid for by Stanford. The counts shall be performed by an independent consultant under the direction of the <u>DirectorCounty Planning Office</u> or provided to the <u>DirectorCounty Planning Office</u> through another County approved methodology.</p> <p>3. The baseline for measuring the no net new commute trips standard shall be the count that was established in 2001. However, during implementation of the 2018 General Use Permit, the County may modify, or approve Stanford-proposed modifications to the monitoring methodology on new technology such as automation, so long as the basic principles underlying the no net new commute trips standard are still met. If the monitoring methodology is updated, testing and calibration of the new methodology or equipment will require coordination with the County. The County may adjust the 2001 baseline as needed to reflect any such calibration. Monitoring counts shall be performed each year using the County-approved methodology.</p> <p>4. Traffic counts and determination of traffic volumes shall occur as described below, unless modifications are approved by the <u>DirectorCounty Planning Office</u>.</p> <p>a. Peak-hour traffic for a single year shall be determined through counts taken at two times during the year. All counts shall be conducted during the regular academic year, which does not include academic breaks or end-of-quarter finals. Homecoming or other irregular traffic patterns should be avoided. Specific dates for each count shall be determined by the <u>DirectorCounty Planning Office</u>. The two annual counts shall be averaged to determine the annual traffic level for each monitoring year.</p> <p>i. During monitoring periods, the total amount of traffic crossing the cordon line will be counted by travel direction. The cordon count monitoring will</p>	<p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, this mitigation would substantially reduce traffic congestion impacts to intersections; however, it is uncertain whether it would be feasible to improve some of the affected intersections if the No Net New Commute Trips standard is not achieved, if there are not sufficient additional funds to complete the intersection impacts, or if there are not sufficient off-campus projects available to reduce peak hour traffic. Many of the intersections adversely affected under 2018 Baseline with Additional Housing Alternative A conditions are located in other jurisdictions (i.e., other than County of Santa Clara, such as City of Palo Alto, Caltrans, etc.), and consequently, the improvements depend on the actions of those jurisdictions. In some cases, additional funding for intersection improvements may be required and is not yet identified, and consequently, it is not certain that these improvements would be implemented in a timely manner.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-163 to 7-178</p>	

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>be conducted on a 24-hour basis. The morning (AM) and afternoon (PM) peak hours within the 24-hour count period will be calculated based on total volumes to determine the campus-wide peak hours.</p> <p>ii. All counts shall be taken at the campus entry and exit points shown in Figure 5.15-2, which together form the defined cordon line. Additional cordon gateways may be added or the location of the cordon line may be modified as determined by the County.</p> <p>a) Traffic counts shall include a methodology to determine the rate of cut-through traffic.</p> <p>1) Cut-through trips will be identified through license plates on each vehicle or other means. Entry and exit times will be noted to determine when a vehicle crosses the cordon in either direction.</p> <p>2) Matching license plates will be determined by comparing numbers that crossed both an entering and exiting cordon within a defined period (i.e., 20 minutes or as updated), or through other means. Vehicles that enter and exit the cordon within the time period will be cut-through trips across the campus without a campus-related purpose. If data are available or it is feasible to measure, the County will include in the cordon counts all rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs.</p> <p>b) Cordon volumes will be adjusted to account for use of parking lots within the cordon line by hospital-related traffic and use of lots outside the cordon line by campus-related traffic. Parking areas change due to the evolving needs of campus and hospital operations. The lots used for hospital and university parking shall be confirmed prior to annual surveys. The County reserves the right to change the methodology related to hospital parking or other</p>		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>parking factors in response to changing conditions.</p> <p>1) Hospital trips will be subtracted from the count and campus trips will be added to the count. The count adjustment will also factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hours, data will need to be collected from each lot. If campus parking occurs in lots outside the cordon, trips associated with those vehicles will be added back into the count. If hospital parking occurs inside the cordon, trips associated with those vehicles will be subtracted from the count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots, unless the County approves an alternate protocol for assigning such parking.</p> <p>c) Based on the 24-hour counts, the AM and PM peak hours will be identified for the campus. Peak hour traffic volume will be determined for the campus based on the count, adjusted for cut-through traffic and hospital parking as described above.</p> <p>1) Total entering and exiting traffic will be summed for the 16 campus gateways. A single AM and PM peak hour will be determined for the entire campus based on the peak inbound traffic in the AM period and the peak outbound traffic in the PM period. The percent of cutthrough trips calculated by the license plate matching (or other technology) described above will be removed. With the exception of rideshare trips (e.g., Uber and Lyft) and other trips associated with drop-offs and pick-ups of people from locations within the cordon line that are not using public or Stanford-sponsored transit programs, the cut-through vehicles will be removed from both the inbound and the outbound traffic since they will have been observed crossing both an entering and exiting</p>		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>cordon boundary. Finally, the entering and exiting traffic for hospital uses inside the cordon boundary and the campus uses outside the cordon boundary calculated as described above will be subtracted from or added to the counts.</p> <p>5. As specified by Community Plan Policy C-8, the DirectorCounty Planning Office will recognize participation by Stanford in off-campus trip reduction efforts and credit those reduced trips towards Stanford's attainment of the no net new commute trips standard. Stanford shall receive credit commensurate with the actual number of trips reduced outside the cordon due to Stanford's direct efforts, or the proportion of the cost of the program to which Stanford is contributing. A reduction of an off-campus trip may be recognized as long as at least one terminus for the trip is within the area shown on Figure 7A.15-1 of the Final EIR. The DirectorCounty Planning Office will determine the appropriate trip credit and monitoring methodology for each program in which Stanford proposes to participate. Such proposals shall be submitted by Stanford to the DirectorCounty Planning Office for review, modification and potential approval. The proposals shall be presented to the Community Resource Group prior to any determination by the DirectorCounty Planning Office. Once the DirectorCounty Planning Office has accepted the proposal and the program implementation begins, the DirectorCounty Planning Office will identify, at Stanford's cost, the number of trips reduced outside the cordon and calculate a trip reduction credit for application toward attainment of the no net new commute trips standard, with the continuing requirement that Stanford provide evidence of its participation in the ongoing program in a manner that can be independently verified. The County reserves the right to further regulate Project-generated trips and the use of trip credits through the Conditions of Approval for the General Use Permit.</p> <p>Funding of off-campus circulation infrastructure improvements may also qualify for trip credits if the improvements will enhance safety or increase mobility for pedestrians, bicyclists or transit users within the</p>		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>local impact area, and thereby remove vehicular trips from the local impact area. For example, funding roadway widening or modifications to add transit vehicle or bicycle lanes or to add signals to improve pedestrian or bicycle safety could qualify for trip credits under this approach if approved by the County. Any proposal for such credits shall be accompanied by substantial evidence demonstrating that the infrastructure project would remove vehicular trips from the local impact area. Once the DirectorCounty Planning Office has approved infrastructure improvement project for a trip reduction credit, the project has been implemented, and the trip reductions have been verified, the trip reduction credit will be factored into the County's conclusion regarding Stanford's annual compliance with the no net new commute trips standard in each subsequent year. Each year, the County will report Stanford's trip credits in its annual monitoring report. The County will track and calculate trip reduction credits in a manner designed to ensure that credits benefit the three geographic sub-areas surrounding the Stanford campus (north, east, and south/southwest) in rough proportion to the 2018 General Use Permit trip assignment forecasted in the Draft EIR. Trip reduction credits with area-wide benefit will be tracked separately from trip reduction credits with sub-area geographic benefits.</p> <p>6. The DirectorCounty Planning Office shall monitor the cordon counts using the procedures described above. If the cordon counts, as modified by trip reduction credits, exceed the baseline volume by 1% or more for any two out of three consecutive years, mitigation of impacts to intersections in the form of fair share payments will be required, implementing Stanford Community Plan Implementation Recommendation C(i)(9). Table 1A identifies the intersection impacts that could occur if the no net new commute trips standard is not achieved, and the physical improvements that would substantially reduce each impact.</p> <p>Upon the County's determination that the no net new commute trips standard has been exceeded by 1% or more in two out of three consecutive years, the County will require Stanford to make its fair share</p>		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>contribution toward improvements at adversely affected intersections and roadways based on all exceedances of the “no net new commute trips” standards. The DirectorCounty Planning Office will use the intersection improvement fees collected from Stanford as follows:</p> <p>a. The fees shall be used to fund the intersection improvements identified in Table 1A. The priority order for funding such intersection improvements will be determined by the DirectorCounty Planning Office in consultation with the affected jurisdictions. If the fees are used to fund an intersection improvement in another jurisdiction, the County will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.</p> <p>b. Substitute Mitigation: If the DirectorCounty Planning Office determines that it is not feasible to use the fees for the specified intersection improvements (e.g., it does not appear that there will be full funding for the improvements within a reasonable time; the public agencies with authority or jurisdiction over the improvement projects will not approve the projects), then the fees may be used to fund off-campus projects that encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area, including but not limited to transit improvements that would directly or indirectly benefit the local impact area. This fund also could be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users provided there is substantial evidence demonstrating how the improvements would remove vehicular trips from the local impact area.</p>		

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
<p>Impact 7A.15-3: Implementation of Additional Housing Alternative A could increase traffic volumes on area freeways, creating adverse impacts under 2018 Baseline with Additional Housing Alternative A conditions.</p>	Significant	<p>Mitigation: Implement Mitigation Measure 7A.15-2.</p>	<p>Finding: The Board finds that the impact of Additional Housing Alternative A's increase in traffic volumes on area freeways under 2018 Baseline with Additional Housing Alternative A conditions is significant and unavoidable. Mitigation Measure 7A.15-2 would reduce impacts to freeways to the extent possible. However, because it is uncertain whether the No Net New Commute Trips standard would be achieved, the freeway impacts under Additional Housing Alternative A would remain significant and unavoidable. Since no additional feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains <i>significant and unavoidable</i>.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, There are limited options to widen freeway segments due to right-of-way constraints. Mitigation of freeway impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or local agency to (1) acquire right-of-way for freeway widening, and (2) fully fund a major freeway mainline improvement. Mitigation Measure 7A.15-2 would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fair share fees paid by Stanford from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips. Nevertheless, because it is uncertain whether the No Net New Commute Trips standard would be achieved, the freeway impacts under Additional Housing Alternative A would remain significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-183 to 7-185</p>	Significant and Unavoidable
<p>Impact 7A.15-9: Implementation of Additional Housing Alternative A, in combination with other past, present, and reasonably foreseeable future projects, could increase traffic volumes at area</p>	Significant	<p>Mitigation: Implement Mitigation Measure 7A.15-2.</p>	<p>Finding: The Board finds that Additional Housing Alternative A would, in conjunction with cumulative development, increase volumes at area intersections, contributing considerably to significant impacts under 2035 Cumulative with Additional Housing Alternative A conditions. Mitigation Measure 7A.15-2 would substantially reduce traffic congestion impacts to intersections. However, there is no feasible mitigation to improve some of the intersections, and for others, it is uncertain whether it would be feasible to improve some of the affected intersections if the No Net New Commute Trips standard is not achieved, or if there are not sufficient off-campus projects available to reduce peak hour traffic. Since no additional feasible mitigation measures or alternatives are available to</p>	Significant and Unavoidable

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
intersections, contributing considerably to significant adverse impacts under 2035 Cumulative with Additional Housing Alternative A conditions.			<p>reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, Measure 7A.15-2 would substantially reduce Additional Housing Alternative A's contribution to cumulative traffic congestion impacts to intersections. However, there is no feasible mitigation to improve some of the intersections, and for others, it is uncertain whether it would be feasible to improve some of the affected intersections if the No Net New Commute Trips standard is not achieved, or if there are not sufficient off-campus projects available to reduce peak hour traffic. Many of the intersections adversely affected under 2035 Cumulative with Additional Housing Alternative B conditions are located in other jurisdictions, and consequently, the improvements depend on the actions of those jurisdictions. In some cases, additional funding for intersection improvements may be required and is not yet identified, and consequently, it is not certain that these improvements would be implemented in a timely manner. At one intersection, the mitigation measure would improve LOS and delay, but would not mitigate impacts to a less-than-significant level. At other intersections, there are no feasible improvements to reduce the impact to a less-than-significant level. For these reasons, the impact would remain significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-194 to 7-203</p>	
<p>Impact 7A.15-10: Implementation of Additional Housing Alternative A, in combination with other past, present, and reasonably foreseeable future projects, could increase traffic volumes on area freeways, contributing considerably to significant adverse</p>	Significant	<p>Mitigation: Implement Mitigation Measure 7A.15-2.</p>	<p>Finding: The Board finds that the impact of Additional Housing Alternative A's increase in traffic volumes in conjunction with cumulative traffic on area freeways would contribute significantly to impacts under 2035 Cumulative with Additional Housing Alternative A conditions. Mitigation Measure 7A.15-2 would reduce impacts to freeways to the extent possible. However, because it is uncertain whether the No Net New Commute Trips standard would be achieved, the freeway impacts under Additional Housing Alternative A would remain significant and unavoidable. Since no additional feasible mitigation measures or alternatives are available to reduce this impact to less than significant, this impact remains significant and unavoidable.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation</p>	Significant and Unavoidable

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
impacts under 2035 Cumulative with Additional Housing Alternative A conditions.			<p>measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, There are limited options to widen freeway segments due to right-of-way constraints. Mitigation of freeway impacts is considered beyond the scope of an individual development project, due to the inability of any individual project or local agency to (1) acquire right-of-way for freeway widening, and (2) fully fund a major freeway mainline improvement. Mitigation Measure 7A.15-2 would reduce impacts to freeways to the extent that trips to and from the campus are reduced to achieve the No Net New Commute Trips standard and through applying any fair share fees paid by Stanford from exceeding the No Net New Commute Trips standard to alternative programs that reduce vehicular trips. Nevertheless, because it is uncertain whether the No Net New Commute Trips standard would be achieved, the freeway impacts under Additional Housing Alternative A would remain significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-216 to 7-220</p>	
<p>Impact 7A.16-1: Additional Housing Alternative A would result in the expansion of existing on-campus infrastructure, the construction of which could cause significant environmental effects.</p>	Significant	<p>Mitigation: Implement the following mitigation measures, as needed for construction of infrastructure improvements:</p> <p><i>Air Quality</i></p> <p>Mitigation Measure 7A.2-2: <i>Best Management Practices for Controlling Particulate Emissions during Construction.</i></p> <p>Mitigation Measure 7A.2-3(a)-(b): <i>Mitigation for Construction TACs and PM_{2.5}</i></p> <p><i>Biological Resources</i></p> <p>Mitigation Measure 7A.3-1(a)-(e): <i>Mitigation for nesting birds during construction.</i></p> <p>Mitigation Measure 7A.3-2(a)-(d): <i>Mitigation for special-status bat species during construction.</i></p> <p>Mitigation Measure 7A.3-3(a)-(c): <i>Mitigation for San Francisco dusky-footed woodrat during construction.</i></p> <p>Mitigation Measure 7A.3-4(a)-(b): <i>Mitigation for special-status plant species during construction.</i></p> <p>Mitigation Measure 7A.3-6(a)-(c): <i>Mitigation for steelhead during construction.</i></p> <p>Mitigation Measure 7A.3-7(a)-(b): <i>Mitigation for riparian habitat during construction.</i></p>	<p>Finding: The Board hereby finds that changes or alterations have been required in, or incorporated into, Additional Housing Alternative A which avoid or substantially lessen the significant environmental effect as identified in the Final EIR. Specifically, Mitigation Measures 7A.2-2, 7A.2-3(a)-(b), 7A.3-1(a)-(e), 7A.3-2(a)-(d), 7A.3-3(a)-(c), 7A.3-4(a)-(b), 7A.3-6(a)-(c), 7A.3-7(a)-(b), 7A.3-8(a)-(b), and 7A.3-9(a)-(c), 7A.3-11(a)-(c), 7A.4-2(a)-(b), 7A.4-3, 7A.8-2(a)-(c), 7A.9-1, 7A.11-1, 7A.11-2, 7A.11-3, and 7A.15-1 are feasible and is adopted to reduce this impact to less-than-significant.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, construction of campus infrastructure improvements to support new development, including water and wastewater improvements, would result in physical effects. Since on-campus utility improvements are part of the overall anticipated development program, the associated construction-related impacts are addressed in the construction impact analyses in the respective EIR technical sections. Implementation of Mitigation Measures 7A.2-2, 7A.2-3(a)-(b), 7A.3-1(a)-(e), 7A.3-2(a)-(d), 7A.3-3(a)-(c), 7A.3-4(a)-(b), 7A.3-6(a)-(c), 7A.3-7(a)-(b), 7A.3-8(a)-(b), and 7A.3-9(a)-(c), 7A.3-11(a)-(c), 7A.4-2(a)-(b), 7A.4-3, 7A.8-2(a)-(c), 7A.9-1, 7A.11-1, 7A.11-2, 7A.11-3, and 7A.15-1 would reduce construction related impacts from infrastructure improvements to a less than significant level.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-230 to 7-232</p>	Less-than-Significant

EXHIBIT 1 (CONTINUED)
ENVIRONMENTAL IMPACTS AND FINDINGS

Impact	Significance without Mitigation	Mitigation Measures	Findings/Rationale for Finding	Significance with Mitigation
		<p>Mitigation Measure 7A.3-8(a)-(b): <i>Mitigation for native oak woodland during construction.</i></p> <p>Mitigation Measure 7A.3-9(a)-(c): <i>Mitigation for wetlands during construction.</i></p> <p>Mitigation Measure 7A.3-11(a)-(c): <i>Mitigation for protected trees during construction.</i></p> <p><i>Cultural Resources</i></p>		
Environmental Consequences of Stanford Providing Off-Campus Housing under Additional Housing Alternative A				
<p>Impact 7A.17-1: Under Additional Housing Alternative A, the construction and/or operation of off-site housing by Stanford would result in off-site environmental impacts.</p>	Significant	<p>Mitigation Measure 7A.17-1: The local governmental agencies in which off-campus affordable housing that would be developed by Stanford would be located can and should mitigate the environmental impacts from off-campus housing to the extent feasible.</p>	<p>Finding: The Board finds that mitigation of off-campus housing impacts is within the responsibility and jurisdiction of other public agencies, which can and should adopt such mitigation measures. The construction and/or operation of off-site housing by Stanford would result in significant and unavoidable off-site environmental impacts.</p> <p>Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible any additional mitigation measures or alternatives. This impact is overridden by Additional Housing Alternative A's benefits as set forth in the Statement of Overriding Considerations.</p> <p>Rationale for Finding: As discussed in greater detail in Final EIR Section 7.4.4, given uncertainties in the specific location and type of off-campus housing that may occur under Additional Housing Alternative A, it is also uncertain if feasible mitigation would exist to reduce all significant environmental impacts to a less than significant level. Further, the County cannot require or guarantee that local governments would implement mitigation measures for off-campus housing included in or required by General Plan EIRs. For these reasons, the impact is determined to be significant and unavoidable.</p> <p>Reference: Final EIR Part 1: Consolidated Draft EIR, pages 7-239 to 7-244</p>	Significant and Unavoidable