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DATE: October 22, 2019

TO: Board of Supervisors

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

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

RECOMMENDED ACTION

Consider recommendations relating to the Stanford University General Use Permit application.

Possible action:

- i. Declare intent to certify the Stanford University Final Environmental Impact Report as complete in compliance with the California Environmental Quality Act, as set forth in Attachment A.
- ii. Declare intent to adopt the required findings (CEQA Findings - Attachment B) pursuant to the California Environmental Quality Act regarding the significant environmental impacts of Alternative A, authorizing up to 2,807 student beds and 2,892 housing units, as set forth in Attachment A.
- iii. Declare intent to approve the Water Supply Assessment, as set forth in Attachment C.
- iv. Declare intent to adopt the Statement of Overriding Considerations, as set forth in Attachment D.
- v. Declare intent to adopt the proposed Mitigation Monitoring and Reporting Program (MMRP), as set forth in Attachment E.
- vi. Declare intent to approve the text amendments and land use map amendments to the Stanford University Community Plan, as set forth in Attachment F, based on findings as set forth in Attachment G.
- vii. Declare intent to approve the Zoning Ordinance Map amendments, as set forth in Attachment H, based on findings as set forth in Attachment G.
- viii. Declare intent to approve the Administration Recommended Stanford General Use Permit, subject to the Conditions of Approval as set forth in Attachment I, and based on findings as set forth in Attachment G.

- ix. Declare intent to deny the Development Agreement Application.
- x. Refer to County Counsel to prepare resolutions supporting actions i-ix and to return to the Board for adoption of these resolutions.

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

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

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

The Administration recommends that the Board adopt Additional Housing Alternative A, and to condition the project to require a minimum of 2,172 housing units and a maximum 2,892 housing units, and a minimum of 2,600 student beds and a maximum of 2,807 student beds. The Administration's recommendation was supported by the Planning Commission when it made a recommendation on the application on June 27, 2019.

The Board may consider and declare its intent to approve Additional Housing Alternative A, the project as applied for by Stanford University, or one of the other alternatives in the EIR. If the Board intends to approve the project as applied for by Stanford University or one of the other alternatives evaluated in the EIR, the Administration would return to the Board with a revised set of Conditions of Approval, CEQA findings, and General Use Permit findings to reflect the Board's intent.

PLANNING COMMISSION RECOMMENDATIONS

On June 27, 2019, the Planning Commission approved forwarding the Administration's recommendations on the items above with specific changes to the Conditions of Approval and requests for additional analysis. The Planning Commission approved the items on a 7-0 vote except for item "i" (denial of the Development Agreement Application), which was approved on a 6-1 vote. **Attachment J** identifies the Planning Commission's recommended changes to the Conditions of Approval and requests for additional analysis, as well as provides the Administration's responses.

REASONS FOR RECOMMENDATION

The matter before the Board of Supervisors is several approvals and actions related to Stanford University's General Use Permit (GUP) application, including:

- Certification of Environmental Impact Report and approval of the Water Supply Assessment
- Adoption of the Statement of Overriding Considerations
- Adoption of the Mitigation Monitoring and Reporting Program
- Approval of Stanford University Community Plan amendments
- Approval of Zoning Map amendments
- Approval of General Use Permit, subject to Conditions of Approval
- Denial of Development Agreement application

Executive Summary

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

The Stanford GUP proposal addresses approximately 4,017 acres of Stanford University lands in unincorporated Santa Clara County located adjacent to the Cities of Palo Alto and Menlo Park, the Towns of Woodside and Portola Valley, and unincorporated areas of San Mateo County. This includes the main Stanford campus area located generally north of Junipero Serra Boulevard (1,724 acres) and the largely undeveloped Stanford foothills located generally south of Junipero Serra Boulevard (2,293 acres). It does not include other

Stanford lands located in adjacent jurisdictions. No other entity under the County's jurisdiction has a General Use Permit.

Community Plan Amendments

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

General Use Permit

The Administration is recommending that the Board of Supervisors approve the General Use Permit for Stanford, as modified by the Conditions of Approval. These modifications to the General Use Permit would, among other things, require Stanford to:

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

Development Agreement Application

The County and Stanford met on November 30, 2018 to establish ground rules for the negotiations, and ground rules were approved by both parties on February 1, 2019. Stanford submitted the first of two offer letters on January 28, 2019. Analysis of this offer letter and the second letter is provided in the Development Agreement Ordinance section of this report.

Negotiations were suspended on April 15, 2019 due to Stanford's violation of the ground rules.

On June 27, 2019, the Planning Commission approved staff's recommendations to deny Stanford's development agreement application. Just prior to the Planning Commission's deliberations, Stanford submitted a second (June 24, 2019) offer letter that County staff analyzed for the value of the benefits, which was determined to be 3.6% of the \$4.7 billion cited in Stanford's offer letter, and identified the housing and traffic concessions Stanford seeks in exchange. These concessions would impair the County's ability to avoid worsening the housing crisis and traffic congestion. County staff's analysis was presented to the Planning Commission before its action on the GUP application at its June 27, 2019 meeting.

On September 17, 2019, Stanford issued a letter to the Ad Hoc Development Agreement Committee that continued to request to negotiate the entire set of conditions of approval; in particular, to reduce the number of market rate and affordable units required and to weaken the recommended traffic conditions. In County staff's analysis, Stanford seeks to reduce the total number of required housing units by 40% (1,308 versus the staff-recommended 2,172 units). Stanford also continues to seek repeal of the Stanford housing ordinances and questions the County's authority to impose these requirements. Stanford also requests to roll back the traffic conditions to the 2000 GUP standard. This letter was reissued to the full Board on September 23, 2019.

County staff concluded that Stanford's two offer letters contained benefits that were not true community benefits, and that the remaining actual benefits were insufficient and that the requested concessions could impair the County's ability to make the necessary findings that protect the community from the impacts of the proposed GUP development and enable staff to recommend approval of the GUP. Because there is no development agreement before the Board for its consideration, staff recommends that the Board declare its intent to deny the development agreement application.

In summary, the staff recommendation to the Board of Supervisors is to approve the authorization of Stanford University's application for 3.5 million square feet of

academic/academic support space and student beds (and other components) and to take the following actions:

- a. Declare intent to certify the Stanford University Final Environmental Impact Report as complete in compliance with the California Environmental Quality Act, as set forth in **Attachment A**;
- b. Declare intent to adopt the required findings (CEQA Findings – **Attachment B**) pursuant to the California Environmental Quality Act regarding the significant environmental impacts of Alternative A, authorizing up to 2,807 student beds and 2,892 housing units, as set forth in **Attachment A**;
- c. Declare intent to approve the Water Supply Assessment, as set forth in **Attachment C**;
- d. Declare intent to adopt the Statement of Overriding Considerations, as set forth in **Attachment D**;
- e. Declare intent to adopt the proposed Mitigation Monitoring and Reporting Program (MMRP), as set forth in **Attachment E**;
- f. Declare intent to approve the text amendments and land use map amendments to the Stanford University Community Plan, as set forth in **Attachment F**, based on findings as set forth in **Attachment G**;
- g. Declare intent to approve the Zoning Ordinance Map amendments, as set forth in **Attachment H**, based on findings as set forth in **Attachment G**;
- h. Declare intent to approve the Administration Recommended Stanford General Use Permit, subject to the Conditions of Approval as set forth in **Attachment I**, and based on findings as set forth in **Attachment G**;
- i. Declare intent to deny the Development Agreement Application; and
- j. Refer to County Counsel to prepare resolutions supporting actions (a)-(i) and to return to the Board for adoption of these resolutions.

Administration’s Recommendations

Nineteen years ago, when the Board of Supervisors approved the 2000 Stanford GUP, as modified by Conditions of Approval, and adopted a Community Plan – innovative Growth and Development, Housing, Circulation, and other pioneering strategies were incorporated to effectively address impacts from proposed development in the Community Plan Area.

The Housing Linkage Policy, for example, that linked the construction of housing with development of academic space, based on a ratio of one housing unit per 826 gross square feet of academic space as set forth in the 2000 Stanford Community Plan established a new standard, along with the other housing strategies, in addressing the supply and affordability of housing in a region that already had a significant jobs-housing imbalance. The 2000 GUP

and Community Plan have served both Stanford University and the surrounding communities well during these past 19 years and continue to be strong foundations for guiding future development.

The Stanford proposal, if approved, would result in an additional 3.5 million square feet of new academic and academic support space/student beds, increasing the total development building area by 20% and increasing the campus population by 9,610. Since adoption of the 2000 Stanford Community Plan and GUP, housing affordability has worsened in Santa Clara County to the point of crisis, which is most acute in the communities and neighborhoods surrounding Stanford University.

Currently, there are 3.49 jobs for every housing unit in Palo Alto, the worst imbalance of cities in Santa Clara County,¹ and the median home value is over \$3 million. The construction of over 3.5 million square feet of new development by Stanford would intensify demand for housing in this area as 5,556 new workers (or 4,010 net new workers) who are either directly employed by Stanford or provide services to the Stanford community seek housing in the area. Recognizing both the existing housing affordability crisis in the Stanford area and the acute housing impacts associated with Stanford's additional growth, the Administration is recommending Conditions of Approval for the Stanford GUP requiring that the University provide a minimum of 2,172 housing units (or payment of in-lieu affordable housing fees) to fully meet the demand created from its ongoing growth.

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

The recommended Conditions of Approval thus require Stanford to adhere to the No Net New Commute Trip standard and require ongoing traffic management and monitoring in additional traffic control measures, including Reverse Commute Trips and Average Daily Trips – two types of traffic that could substantially worsen congestion in the surrounding areas. In addition, given the worsening congestion on roads surrounding Stanford, the conditions mandate that ongoing development at Stanford could be suspended following a

¹ Local Agency Formation Commission of Santa Clara County, *Cities Service Review*, p. 7 (Dec. 2015), http://www.santaclaralafco.org/file/ServiceReviews/CitiesSR2015/2CSRR_ExecSumm.pdf.

public hearing process if Stanford does not adhere to the traffic or housing Conditions of Approval.

The Comparison Table, below, compares Stanford's proposal as set forth in its application with the Administration's recommendations.

Comparison Table Stanford's Proposal and Administration Recommendations

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

The Administration is recommending approval of the GUP with the Conditions of Approval requiring Stanford to build a minimum of 2,172 housing units (and a maximum of 2,892 units) to address the housing demand associated with the construction of 3.5 million new square feet of development.

The environmental impacts of constructing this additional housing were fully evaluated as Alternative A within the Stanford GUP Environmental Impact Report (EIR) prepared for the project. The EIR discloses that construction of Alternative A would have more significant environmental impacts than the proposed GUP application submitted by Stanford. Specifically, the EIR discloses that the construction of this additional housing would have additional significant environmental impacts related to air quality emissions and traffic impacts. These additional environmental impacts are related to potential additional traffic and construction activity associated with the additional housing units and on-site residents at Stanford University.

Despite the potential for these additional environmental impacts, the Administration is recommending the Board of Supervisors approve the GUP and adopt the Conditions of Approval requiring the construction (or payment of in-lieu affordable housing fees) of at least 2,172 housing units to ensure that Stanford fully addresses housing demand from construction of an additional 3.5 million square feet of development. If the County does not require Stanford to provide sufficient housing to address housing demand, ongoing development at Stanford would exacerbate the housing affordability crisis that acutely impacts the areas around the University.

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

I. PROJECT DESCRIPTION – STANFORD’S PROPOSED PROJECT

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

Additional project approvals, not a part of Stanford's application, include Amendments to the Stanford University Community Plan proposed by the Administration, and a Water Supply Assessment required for the project pursuant to State law. Each of these project elements is summarized below.

A. Stanford University General Use Permit Application

Stanford's GUP Application seeks programmatic authorization of specified levels of academic, housing, and support uses within the Stanford University Campus located within unincorporated Santa Clara County, subject to site-specific approvals at the time each individual building project is proposed. The GUP Application is intended to replace the approved 2000 General Use Permit (2000 GUP). The GUP Application also requests specific provisions in regard to housing, transportation, and parking and makes commitments regarding safe routes to school improvements, sustainability programs, and off-site park maintenance. These requests are summarized below. The GUP Application Project Description is included as **Attachment K** to this report.

Requested GUP Development

Table 1 summarizes development proposed in Stanford’s GUP Application and the remaining authorized, but-not-yet-constructed, development from the 2000 GUP.

Table 1. Stanford’s Proposed Uses and Development Levels

Development Type	Proposed GUP	Proposed Carry- Over from 2000 GUP	Total Proposed
Academic/ Support	2,275,000 sf	185,717 ²	2,460,717 sf
Student Beds	2,600	N/A	2,600
Faculty/Staff Housing Units	550	N/A	550
Childcare Space/Trip Reduction Uses	40,000 sf	N/A	40,000 sf
Temporary Construction Surge Space (Trailers)	50,000 sf at a time	N/A	50,000 sf at a time
Development Outside AGB	0	N/A	0
Parking	2,000 space reserve ³	1,352 spaces ⁴	3,352 spaces

The GUP Application proposes the distribution of this new academic/academic support space and housing by development districts similar to those used in the 2000 GUP (with minor changes) and includes a process for shifting development between districts subject to County review and approval.

Stanford’s Proposed GUP Provisions and Commitments

The Stanford GUP Application proposes the following provisions regarding housing, transportation, and parking and commitments regarding safe routes to school improvements, sustainable development, and public park upgrades.

- **Housing Linkage** – Construction of housing in tandem with construction of academic space based on the ratio specified in the 2000 GUP: one (1) housing unit/826 gross square feet (g.s.f.) of academic space.

² Of the total 2,035,000 sq. ft. approved under the 2000 GUP, this is the remaining amount as of 8/31/2018 (Annual Report #18 Dated July 2019) that has not been constructed and for which no application for architecture and site approval or building permit has been submitted. The actual carry-over amount will be determined on the effective date of the GUP.

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

⁴ The Stanford University Parking Space Survey of July 2018 indicated 1,352 remaining authorized parking spaces. The actual parking carry-over would be determined on the effective date of the GUP.

- Affordable Housing – Provision of 450 graduate student housing units that meet the requirements for Moderate Income residents, and payment of affordable housing fees at a rate of \$20 per square foot of net new academic space.
- Transportation – Continuation of the No Net New Commute Trips (NNNCT) standard with proposed changes to implementation details of NNNCT monitoring and traffic mitigation, including provision for payment of a portion of the fair share fees for intersection improvements (based on a per trip over the limit fee basis)
- Parking – Addition of a 2,000-space parking reserve (that can be activated with Planning Commission approval) to the 21,651-space parking cap established by the 2000 GUP and exclusion of certain types of parking from the parking count.
- Safe Routes to School – Improvements of pedestrian facilities on Stanford lands in and around Nixon and Escondido Elementary Schools, such as, new or enhanced crosswalks and signage.
- Sustainable Development – Commitments regarding air quality standards for construction equipment, electrification of Stanford buildings and vehicles, and low water landscaping.
- Parking Improvements – Funding (\$375,000) of public park renovations in Palo Alto parks.

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

Stanford proposes to amend the Stanford University Community Plan (SCP) Land Use Map and the Zoning Map designations for the driving range and nine housing sites. The existing and proposed land use designations and zoning districts are summarized in **Table 2**. The proposed land use designations are shown in **Figures 1 and 2** of **Attachment L** and the proposed zoning districts are shown in **Figures 3 and 4** of **Attachment L**.

Table 2. Stanford’s Proposed SCP Land Use Map and Zoning Map Amendments

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

C. Stanford Community Plan Text Amendments Proposed by Stanford

Stanford proposes minor changes to the text of the Stanford Community Plan (SCP) Housing Chapter that would generally remove information identifying specific housing sites and instead refer to the housing site information in the General Plan Housing Element 2015-2022. These amendments, with revisions shown in underline and strike out, are provided in Stanford’s GUP Application (**Attachment K**).

D. Development Agreement Application

Stanford University submitted a development agreement application on July 27, 2018 (**Attachment M**). The application was deemed complete by the Department on October 17, 2018. The status of the negotiation process is described in section VII of this report.

E. Water Supply Assessment

Senate Bill 610 (SB 610) requires the preparation of a Water Supply Assessment (WSA) for certain large-scale development projects, such as, the subject Stanford project, that require an EIR. The WSA is required to include a discussion of whether the total projected water supplies, determined to be available for the project during normal, single dry, and multiple

dry water years during a 20-year projection, will meet the projected water demand associated with the proposed project.

Since there is no “public water system” serving the Stanford campus, the County, as the CEQA Lead Agency for the project Environmental Impact Report (EIR), is the approving jurisdiction for WSAs for the proposed project and Housing Alternatives A and B.⁵ The WSAs were prepared by Stanford University and its consultant, peer reviewed by the County’s consultant, and were determined by the County to adequately assess water supply availability. The WSAs are located in the Appendices to the EIR (Appendix WSA and ALT WSA) and the most recently updated WSA is included as **Attachment C**.

In response to comments raised during the Planning Commission’s consideration of the GUP application relating to the State Water Resources Control Board’s amendments to the Bay Delta Water Quality Control Plan, the WSA has been updated. The revisions conclude that despite potential water supply reductions during extended droughts, sufficient water supplies will be available to serve the Stanford Campus under the two housing alternatives because (a) Stanford curtails water use during extended droughts; and (b) Stanford has the ability to meet its potable water needs during an extended drought through use of groundwater. County staff has determined, based on the entire record, that projected water supplies will be sufficient to satisfy the demands of the Administration Recommended GUP, in addition to existing and planned future uses.

II. ENVIRONMENTAL IMPACT REPORT

The Stanford University General Use Permit Environmental Impact Report (EIR)⁶ has been prepared and processed in conformance with the requirements of the California Environmental Quality Act (CEQA) and the CEQA Guidelines to disclose the significant environmental effects of the proposed project and project alternatives. The Draft EIR was circulated for public review in October 2017. In June 2018, in response to public comments on the Draft EIR, the County revised and circulated for public review Recirculated Portions of the Draft EIR. In December 2018, the County released the Final EIR, which integrates the Draft EIR and Recirculated Portions of the Draft EIR into a single document that includes public comments, responses to those comments and revisions to the Draft EIR.⁷

⁵ WSAs are a part of the full environmental analysis prepared for Alternatives A and B in order to identify the implications of constructing additional on-campus housing.

⁶ https://www.sccgov.org/sites/dpd/programs/stanford/pages/gup2018_ceqa.aspx

⁷ A First Amendment to the Final Environmental Impact Report has been prepared to include additions to the Final EIR since its release in December 2018. The First Amendment includes the updated Water Supply Assessment; response to comments raised during the Planning Commission hearing; modifications to mitigation measures; and, an errata sheet tracking minor changes to text within the Final EIR.

The Recirculated EIR included a full analysis of the environmental impacts of Additional Housing Alternative A, which assumes the addition of housing to the proposed project sufficient to meet the full housing demand generated by Stanford's GUP Application—up to 5,699 housing units/student beds. The public was provided an opportunity to comment on Alternative A and its impacts when the Draft EIR was recirculated, and the Final EIR responded to public comments received on Alternative A and its impacts.

The Administration is recommending adoption of the GUP with the Conditions of Approval requiring Stanford to provide 2,172 housing units (including payment of in-lieu affordable housing fees) to address the housing demand associated with the construction of 3.5 million new square feet of development. The environmental impacts of constructing this additional housing were fully evaluated under Housing Alternative A. The EIR discloses that construction of Alternative A would have more significant environmental impacts than the proposed GUP application submitted by Stanford. (See **Attachment N** for a summary of the environmental impacts of Alternative A as compared to the project.)

Specifically, the EIR discloses that the construction of this additional housing would have additional significant environmental impacts related to air quality emissions and traffic impacts. These additional environmental impacts are related to potential additional traffic and construction activity associated with the additional housing units and on-site residents at Stanford University. Despite the potential for these additional environmental impacts, the Administration is recommending the Board of Supervisors adopt the Conditions of Approval requiring the construction of 2,172 housing units to ensure that Stanford fully addresses housing demand from construction of an additional 3.5 million square feet of development.

If the County does not require Stanford to provide sufficient housing to address housing demand, ongoing development at Stanford would exacerbate the housing affordability crisis that acutely impacts the areas around the University. Resulting impacts would include an increase in the percentage of families living in substandard housing and longer commute times as workers are compelled to find affordable housing outside of the region. This deficiency in housing and decrease in affordability worsens social inequity throughout the region, creating more displacement and socio-economic fragmentation in local communities. The need to address these broader socio-economic impacts by ensuring that Stanford fully mitigates the housing impacts of its increased development outweighs the significance of the additional environmental impacts disclosed within the EIR.

In order to approve the GUP as recommended, the Board of Supervisors will need to adopt findings regarding the significant environmental impacts of Alternative A, including a Statement of Overriding Considerations explaining the reasons for approval of Alternative A, despite its significant environmental impacts. Draft CEQA findings are included as

Attachment B and a draft Statement of Overriding Considerations is included as **Attachment D** to this report.

III. ADMINISTRATION RECOMMENDATIONS - GENERAL USE PERMIT

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

- A. Housing and Affordable Housing
- B. Traffic and Transportation

A. Housing and Affordable Housing Recommendations

Since adoption of the 2000 Stanford Community Plan and GUP, housing availability and affordability have worsened in Santa Clara County to the point of crisis. During the continued economic expansion that has occurred since the Great Recession ended in 2010, the Bay Area has added 722,000 jobs, but constructed only 106,000 housing units, exacerbating a long-term imbalance between jobs and housing.⁸ Furthermore, from 2010 to 2019, the population of Santa Clara County increased 9.7% (from 1,781,642 to 1,954,286), but the number of housing units only increased 6.25% (from 631,920 to 671,439).⁹ This imbalance significantly impacts housing availability and affordability.

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

⁸ Metropolitan Transportation Commission and Association of Bay Area Governments, *CASA Compact* (January 2019), p. i, https://mtc.ca.gov/sites/default/files/CASA_Compact.pdf

⁹ State of California, Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark (May 2019), <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

the lower the income level: 23% of moderate-income units completed to date; 13% of low-income units; and 10% of very low-income units.

The Harvard Joint Center for Housing Studies found that only 22.3% of all households in the San Jose-Sunnyvale-Santa Clara metropolitan area (which includes the City of Palo Alto and Stanford University) could afford the typical monthly payments for a median-priced home.

According to the National Low-Income Housing Coalition's Out of Reach 2018 study, the San Jose-Sunnyvale-Santa Clara HUD Metropolitan Fair Market Rent Area is the second most expensive metropolitan rental market in the United States. As result, tens of thousands of people in Santa Clara County are ill-housed or homeless. The severe housing shortage in the Bay Area has reached crisis proportions.

The housing supply and affordability concerns in Santa Clara County are the most acute around Stanford University due to the high housing prices in the area and the employment opportunities generated by Stanford. Currently, there are 3.49 jobs for every housing unit in Palo Alto, the worst imbalance of cities in Santa Clara County, followed by Mountain View where there are 2.37 jobs for every housing unit.¹⁰

Proposed GUP Housing Deficit

Stanford's proposed construction of 3,500,000 square feet of academic and academic support space/student beds and 550 faculty/staff housing units would substantially increase housing demand without providing the commensurate level of housing needed. The Stanford GUP Application estimates that buildout of the academic space would add 5,556 employees including:

- 2,438 staff,
- 789 faculty,
- 961 postdoctoral scholars,
- 57 janitors,
- 72 third-party contract workers,
- 966 casual and temporary workers, and
- 273 contingent workers.

¹⁰ Local Agency Formation Commission of Santa Clara County, *Cities Service Review*, p. 7 (Dec. 2015), http://www.santaclaralafco.org/file/ServiceReviews/CitiesSR2015/2CSRR_ExecSumm.pdf.

In response to comments submitted on the Draft Environmental Impact Report regarding impacts associated with the increase in the employees at Stanford and traffic impacts, the County prepared an Alternative to the Draft Environmental Impact Report evaluating the environmental impacts of providing full housing (Additional Housing Alternative A).

The County's Affordable Housing Nexus Studies indicate that both development of academic space and new residential units on the Stanford Campus directly and indirectly create new jobs, including service workers who require affordable housing. Because affordable housing is in short supply in the Stanford Community Plan Area and environs, these workers are forced to pay a disproportionate share of their incomes for housing, live in substandard housing conditions, or commute long distances to the Stanford area from more affordable areas outside of the region.

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

The Nexus Analysis Addendum indicates the proposed GUP development would result in **4,010¹¹ net new workers** and a demand for 2,172 new housing units, including 964 housing units affordable to workers with incomes between 0% and 120% of the Area Median Income (AMI) (**Table 3**). The construction of over 3.5 million square feet of new development by Stanford would intensify demand for housing in this area as new workers who are either directly employed by Stanford or provide services to the Stanford community seek housing in the area. If unmet, this additional housing demand has the potential to exacerbate the existing severe housing shortage in the areas surrounding Stanford University.

Table 3. Housing Demand

Housing Category	Number Units
Market Rate Housing	1,208
Below Market Rate Housing	
• Moderate Income	389
• Low Income	429
• Very Low Income	108
• Extremely Low Income	38
Subtotal	964 ¹²
Total Units	2,172

Housing Impact Mitigation Fee Ordinance and Inclusionary Housing Ordinance

In September 2018, the Board of Supervisors adopted the Housing Impact Mitigation Fee Ordinance and the Inclusionary Housing Ordinance to mitigate for future impacts on affordable housing within the Stanford Community Plan Area. The Ordinances were based on the affordable housing needs identified by the Affordable Housing Nexus Analysis Addendum (Nexus Addendum). The Housing Impact Mitigation Fee Ordinance establishes a mitigation fee, operative as of July 1, 2019, of \$36.22 per square foot of academic development in the first year and a \$68.50 fee in the second year and thereafter.

The Housing Impact Mitigation Fee Ordinance allows an applicant, including Stanford, to obtain fee credit if the applicant chooses to construct affordable units, based on the fee rate in effect at the time. After the first year, the \$68.50 fee would mitigate approximately half of the affordable housing demand generated from future development of academic space within the Stanford Community Plan Area.

¹¹ The KMA Nexus Analysis adjusted the number of workers identified by Stanford to reflect part-time workers (i.e. less than 50% of a Full Time Equivalent).

¹² The total number of Below Market Rate Units as identified in the Nexus Study was adjusted downward to 933 to account for overlap between the Housing Impact Mitigation Fee Ordinance and the Inclusionary Housing Ordinance.

The Inclusionary Housing Zoning Ordinance requires 16% of all market rate housing units constructed within the Community Plan Area to be below market-rate. For rental units:

- 15% must be affordable to low- or very low-income households,
- 45% to low-income households, and
- 40% to moderate income households.

For-sale units must be affordable to moderate income households, which include households earning up to 120% of the area median income. The two Ordinances were operative on July 1, 2019 and will apply to Stanford development under the proposed GUP. The Mitigation Fee Ordinance and Inclusionary Housing Ordinance address future affordable housing demands.

Recommended Conditions of Approval

The construction of over 3.5 million square feet of new development by Stanford would intensify demand for housing in this area as new workers who are either directly employed by Stanford or provide services to the Stanford community seek housing in the area. Recognizing both the existing housing affordability crisis in the Stanford area and the acute housing impacts associated with Stanford's additional growth, the Administration is recommending Conditions of Approval for the Stanford GUP that require the University to provide sufficient housing units to fully off-set the demand created by its proposed growth, including both market-rate and below market-rate (BMR) housing.

The Administration recommends the following housing requirements:

- Minimum Required Housing. Require Stanford to address all of the market-rate housing and affordable housing demand resulting from the buildout of 3.5 million square feet of development, a total of 2,172 housing units and 2,600 student beds. This requirement reflects 100% of estimated demand from the Nexus Analysis Addendum, adjusted downward slightly to eliminate overlap in demand associated with the inclusionary ordinance and the academic space affordable housing mitigation impact fee. The 2,600 student beds equal the number of beds proposed by Stanford in the GUP application. (See **Table 4**)
- Minimum BMR Units–To Off-Set Demand for Academic Development. Consistent with the Housing Impact Fee Mitigation Ordinance, require Stanford to pay mitigation fees or receive fee credit for construction of deed-restricted (for a minimum of 55 years) below market-rate units based on fee rates in effect at that time. Because the current mitigation fees address approximately half of the

affordable housing demand, allow fee payment for no more than 60% of the required below market-rate units (i.e., 560 units of the total 933 units). Require construction of the remaining 40% (373 units).

- Minimum Inclusionary Units–To Off-Set Demand for Housing Development. Consistent with the Inclusionary Housing Ordinance, require Stanford to construct 16% of the required market-rate units as deed-restricted¹³ units that meet the specified affordability requirements (a minimum of 198 units). Require 100% of the market-rate and inclusionary housing units to be constructed (1,239 units).
- On-Campus Housing. Require a minimum of 70% of the constructed housing units to be located on the Stanford campus (a minimum of 1,128 housing units). Require 100% of the required minimum 2,600 student beds to be located on the campus.
- Off-Campus Housing. Require 30% of new housing constructed off the campus to be located within a six-mile radius of the campus, unless an exception is granted by the Planning Commission based on a preponderance of evidence demonstrating that it is infeasible to construct within a six-mile radius due to inadequate housing sites.
- Maximum Allowed Housing. Allow Stanford to construct more housing than is required–up to 2,892 housing units and 2,807 student beds (1,225,000 square feet). The proposed maximums are consistent with the housing assumptions for Housing Alternative A, which were fully addressed in the EIR.
- Housing Linkage. Require Stanford to provide housing concurrent with construction of new academic facilities based on the linkage benchmarks for each Development Phase in conformance with **Table 5**. Verify compliance annually for Phases 1-3 and prior to authorization of the next phase. For Phase 4, verify compliance annually.

¹³ Deed restriction is required for a minimum of 55 years.

Table 4. Housing Recommendations

Housing	Minimum Required	Maximum Allowed	Housing Location
Faculty/Staff Housing Units			
Market-Rate and 16% Inclusionary Units	1,239 ¹⁴	1,959	Construct a minimum of 70% of all units (by income category) on campus.
Below Market-Rate Units by Income Category			
<i>Moderate Income</i>	347	N/A	A minimum of 70% of constructed units by income category shall be located on campus.
<i>Low Income</i>	381	N/A	
<i>Very Low Income</i>	133	N/A	
<i>Extremely Low Income</i>	72	N/A	
Below Market-Rate Units All Income Categories	933	N/A	
Subtotal	2,172	2,892	
Student Housing			
Student Beds	2,600	2,807	Construct 100% of all student beds on-campus
TOTALS	4,772	5,699	

¹⁴ This would include 198 inclusionary deed restricted affordable units (16%) and 1041 market rate units.

Table 5. Required Housing by Increments of Academic Development

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

B. Traffic and Transportation Recommendations

Since adoption of the 2000 GUP, the Peak Hour No Net New Commute Trips standard has been the framework for addressing traffic associated with new development on the Stanford campus. Compliance with the standard is assessed annually by monitoring peak hour, commute direction traffic (i.e., traffic entering the campus in the morning and leaving in the evening) at gateway intersections along a cordon. The threshold for lack of conformance with the standard is an increase in total traffic levels at the gateway intersections of 1% or more as compared to the baseline established in 2001.¹⁵ Stanford may reduce monitoring counts that exceed the baseline through application of trip reduction credits awarded by the County based on Stanford’s contribution to efforts in the surrounding area that result in trip reduction.¹⁶

The EIR identifies the no net new commute standard as the first-line mitigation for the project’s traffic impacts. If Stanford is not successful in achieving No Net New Commute

¹⁵ For example, the baseline established in 2001 for total commute trips to the campus passing through the cordon gateways in the AM peak hour is 3,439 trips. An increase of 1% or more (i.e., 35 trips or more) would constitute a violation of the standard.

¹⁶ For example, if Stanford funds a trip reduction project in Palo Alto, and can demonstrate that the project would reduce 10 peak hour trips, the County could award Stanford 10 peak hour trip reduction credits and those credits could be used to reduce peak hour trip exceedances.

Trips, alternative mitigation in the EIR requires the University to make fair-share payments to partially fund mitigation improvements identified in the EIR that would mitigate traffic impacts.

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

The existing 2000 GUP’s traffic metrics focus on Stanford as a job center with the dominant commute traffic pattern consisting of traffic heading to the campus in the morning and away from the campus in the evening. As Stanford adds faculty and staff housing units on the campus, other household members who do not work or attend classes at Stanford, leave the campus in the morning for work or school and return in the evening, contributing to a “reverse commute.”

Reverse Commute

In response to the Planning Commission’s requests for analysis on the reverse commute, the County’s traffic consultant, AECOM, provided a memorandum on the reverse commute, included in this report as **Attachment P**. While a reverse commuter typically takes advantage of otherwise unused transportation capacity, in its memorandum, AECOM points out that Stanford University represents a somewhat atypical situation. The Stanford commute occurs within the context of the larger Bay Area commute, such that the “reverse commute” direction for campus traffic coincides with the “peak direction” for residents in the surrounding communities who do not work or go to school at Stanford.

The EIR confirms that reverse commute traffic for Alternative A exacerbates existing traffic congestion, resulting in significant traffic impacts at three intersections. Like the commute direction impacts, the fair-share payments for intersection mitigation improvements for these intersections are not sufficient to mitigate the traffic impacts, which remain significant and unavoidable. As documented in the EIR, reverse commute traffic results in five to eight

impacted intersections due to Alternative B and A, respectively.¹⁷ A new reverse commute traffic standard would encourage Stanford to broaden its Transportation Demand Management (TDM) programs to minimize new reverse commute traffic on already highly congested roadways in the area around the Stanford campus. AECOM prepared a memorandum on TDM at Stanford, included in this staff report as **Attachment Q**.

Average Daily Trips

In addition, a longer two-hour “peak period,” and average daily trips (ADT) regulations, would provide a comprehensive traffic approach for this GUP. Controls for longer peak periods address traffic that might otherwise spill outside peak hours as congestion increases. AECOM prepared a memorandum on ADT, included in this staff report as **Attachment R**.

ADT regulations address total vehicle trips over a 24-hour period, providing a more comprehensive picture of the traffic congestion, energy consumption, and air pollution associated with ongoing Stanford development. Other Bay Area jurisdictions that are currently implementing ADT traffic regulations and/or fee programs include Menlo Park, Mountain View, and Los Gatos.

Recommended Conditions of Approval

In order to ensure that Stanford development does “not substantially worsen traffic congestion affecting the surrounding area” (a required finding for approval of this GUP – Zoning Ordinance § 5.65.030), the Administration recommends traffic Conditions of Approval structured in three tiers that retain the No Net New Commute Trips standard and establish new trip reduction and monitoring controls. Following is an overview of the recommendations.

Tier 1. No Net New Commute Trips, Peak Hour and Peak Period

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

¹⁷ Stanford Univ 2018 GUP Final EIR, State Clearinghouse No. 2017012022, Appendix RCA - Reverse Commute Analysis, Table 4, page 10.

Tier 2. No Net New Commute Trips – Reverse Commute

- Require Stanford to use its best efforts to achieve no net increase in reverse commute trips during the peak hours and peak periods (i.e., avoid exceeding the reverse commute direction peak hour or peak period baselines by 2% or greater).

Tier 3. Average Daily Trips

- Require Stanford to implement all feasible measures to achieve no net new increase in **Average Daily Trips** (ADT) during weekdays only (i.e., avoid exceeding the baseline by 3% or greater).

In response to the Planning Commission recommendations, staff has modified the Transportation Conditions, including the addition of the confidence interval back into the trip baselines, and allowing Stanford to use trip credits for Reverse Commute and ADT.

See the Administration's Recommended Conditions of Approval dated October 8, 2019 (**Attachment I**) for the full Transportation Conditions.

Other Traffic and Transportation Requirements

The Conditions of Approval include the following requirements:

- Regulations for independent and verifiable annual traffic monitoring and reporting to determine compliance with the GUP's traffic standards (Conditions F).
- Procedures for granting trip credits as a result of Stanford's funding programs or off-campus improvements that shift travelers away from motor vehicles (Condition F).
- Based on Stanford's offer in the GUP Application, requirements for safe routes to school improvements near Nixon and Escondido Elementary Schools (Condition).
- Requirements for fair-share contributions to fund safe routes to school studies and improvements if a new school is required or school attendance boundaries are changed to accommodate the increase in Stanford K-12 students (Condition).
- Provision for fair-share traffic improvement payments.
- A parking cap of 21,651 and exclusion from the parking count of:
 - Structured parking for faculty/staff/worker housing, up to one space per unit;
 - Bus and oversized vehicle parking; and
 - Emergency vehicle parking (police, fire, ambulance).

- Requirement that Stanford provide fair-share funding for parking studies and residential permit parking programs as needed to ensure that spillover parking does not impact residential neighborhoods (Condition).

C. Other GUP Recommendations

Other recommended Conditions of Approval require the following:

- Open Space. Preservation of open space and natural resources by focusing new development within the Academic Growth Boundary (AGB) and limiting development outside the AGB;
- Phased Development. Phased authorization of development within the General Use Permit, ensuring that Stanford complies with the requirements for traffic and housing before authorizing additional development phases;
- El Camino Real Frontage Plan. Stanford funding of an updated El Camino Real Frontage Plan for Stanford lands along the south side of El Camino Real to identify standards for future development;
- Master Drainage Plan. Stanford preparation and implementation of an updated Master Drainage Plan to achieve a storm drain system that avoids increases in frequency, severity, or lateral extent of flooding in San Francisquito and Matadero Creeks to the satisfaction of the Planning Director; and,
- Municipal Services Study. Stanford funding and implementation of a Municipal Services Study to identify service needs of the Stanford community. In response to concerns raised in Stanford's September 23 letter to the Board of Supervisors, the Administration revised the condition to make explicit that the results of the Study would be presented to the Board for its consideration in a public meeting. If the Board concludes that there are inadequate levels of municipal services, it could direct County staff to work with Stanford to improve service levels. In addition, the Parks and Child Care studies were consolidated into the Municipal Services Study. (Condition O).

IV. ADMINISTRATION RECOMMENDATIONS – COMMUNITY PLAN

The Administration is recommending the County amend the Stanford Community Plan (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 full text of the SCP with Administration recommendations is included in **Attachment F** and a summary is provided in **Table 6**. The findings to support the SCP amendments are set forth in **Attachment G**.

Key among the recommended amendments are provisions to extend and strengthen the open space protections of the Academic Growth Boundary (AGB). These provisions and other

regulations and provisions that work together to protect the Stanford foothills are discussed below.

Open Space Protection

The AGB separates the central campus area, where future academic and housing development is planned, from the foothills to the west, where development is restricted (see **Figure 5 of Attachment L**). The adopted SCP establishes the AGB in its current location for a period of 25 years (until 2025) and until development reaches 17.3 million square feet, and requires a super-majority vote (4/5) of the Board of Supervisors for any decision to amend the AGB. Stanford is expected to reach the 17.3 million square-foot threshold by approximately 2023.

The findings of the Sustainable Development Study Supplement confirm that the land area within the AGB is sufficient to support Stanford development at historic rates for 100 years or more. In order to ensure that future development occurs within the central campus and that existing open space continues to be protected, the Administration recommends updating the Community Plan's AGB provisions as follows:

- Extend the duration of the AGB by 99 years (until 2118).
- Retain the required four-fifths vote of the Board of Supervisors for any revision of the AGB.
- Identify the factors that would need to be considered in any decision to change the existing AGB.

These AGB protections establish clear expectations for preservation of open space within the Stanford foothills. These protections are supported by SCP Land Use Designations, Zoning District regulations, U.S. Fish and Wildlife environmental requirements, and recommended GUP Conditions of Approval, all of which severely limit new uses or structures in the foothills outside the AGB. Specifically, any development would be subject to the use regulations, structure limitations, and natural resource protection requirements of the SCA Special Conservation Area Zoning District or the OS/F Open Space and Field Research Zoning District (whichever is applicable), as well as requirements of the Habitat Conservation Plan and associated conservation easements (California Tiger Salamander Reserve and Matadero/Deer easements) and 50-year no build areas. The recommended GUP Conditions of Approval further limit structures to a total of 1,540 square feet and prohibit new housing units within the Foothills District (Condition C).

The Administration finds that the AGB, together with the General Plan level land use designations, zoning regulations and GUP conditions of approval are sufficient to ensure the

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

School Site Designation

The Administration recommends that the Potential Future School Site be relocated on the Community Plan Land Use Map to a location within the AGB closer to the planned future housing identified in the GUP Application within the Quarry District on the west side of the Stanford campus. The recommended changes to the Community Plan before the Board include a new policy (SCP-LU 23) that requires a community plan amendment to relocate the Potential Future School Site. Since the Community Plan is before the Board along with the GUP application, this would be the appropriate time to consider utilizing this high-level planning tool to integrate school site planning with proximate new housing development. This action has also been requested by members of the public who have provided spoken or written comments requesting that the County plan for a future school on the west side of the Stanford campus.

Table 6. Summary of Recommended Community Plan Amendments

Growth and Development	
Maximum Development	<p>Context: Development proposed by the GUP Application exceeds the 17.3 million square-foot limit established by the SCP (adopted SCP-GD 2).</p> <p>Proposed Amendment: Establish a new development cap of 20.4 million square feet of academic/academic support development and student housing.</p>

Academic Growth Boundary	<p>Context: The adopted SCP allows for Stanford to request a modification of the Academic Growth Boundary (AGB) as early as 2025. Any decision to amend the AGB requires a 4/5 vote of the Board of Supervisors (adopted SCP-GD 3).</p> <p>Proposed Amendments: Extend duration of the AGB for 99 years (until 2118), retain the 4/5 vote requirement for amendments to the AGB, and identify specific factors that should be considered prior to any decision to change the location of the AGB (proposed SCP-GD 3)</p>
Land Use	
Public School Site Designation	<p>Proposed Amendments: Add policy acknowledging that identified potential future school site may be relocated to a different location if warranted by future development patterns (SCP-LU 23)</p>
Alignment of Zoning and SCP Designations	<p>Proposed Amendments: Add policy language specifying the County should periodically evaluate zoning designations to ensure that they conform and are consistent with SCP policies and land use designations (proposed SCP-LU 4) and specifically evaluate the A-1 District (proposed SCP-LU (i)1) and the Campus Residential-Low Density areas within the San Juan District (proposed SCP-LU (i) 2), and create a new Campus Open Space Zoning District and apply it to areas designated Campus Open Space on the Land Use Plan (proposed SCP-LU (i) 3).</p>
Housing	
Housing/Jobs Housing Balance	<p>Context: Current SCP policies call for housing types and supply adequate to meet the needs of Stanford faculty, staff, students, postgraduate fellows and medical interns (adopted SCP-H 1), including affordable housing (adopted SCP-H 6).</p> <p>Proposed Amendments: Add policy language that requires that affordable housing be provided at all affordable income categories documented (proposed SCP-H 6), and clarify that housing requirements apply to “other workers” as well as faculty and staff.</p>
Health and Safety	
Health & Safety/Climate Change	<p>Proposed Amendment: Incorporate the County’s Health Element addressing social and environmental health and climate change into the SCP for ease of reference.</p>

STANFORD'S OBLIGATIONS FOR SCHOOL FACILITY IMPACTS

The State of California authorizes school districts to justify and adopt (subject to specific requirements) developer impact fees to mitigate the impacts of new development on school facilities. The California Government Code (Section 65996) specifies that payment of a school district's developer impact fee shall be considered full mitigation for impacts a development may have on schools and specifically prohibits a local jurisdiction from denying or refusing to approve a project based on a developer's refusal to provide school facilities fees above and beyond the adopted school district fees. Palo Alto Unified School District, which serves residents of the Stanford University campus, has adopted the following school impact fees:

- Residential Development – \$3.79 per square-foot of assessable space
- Commercial Development – \$0.61 per square-foot of assessable space

Academic support space and student housing/beds are charged the rate for Commercial Development. Payment of these fees prior to issuance of a building permit for development satisfies Stanford's obligation in regard to school facility impacts. The total amount of school facility impact fees that Stanford would pay over the life of the proposed GUP is \$4.2 million.

VI. ADMINISTRATION RECOMMENDATIONS – WATER SUPPLY ASSESSMENT

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

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

In response to comments raised during the Planning Commission’s consideration of the GUP application relating to the State Water Resources Control Board’s amendments to the Bay Delta Water Quality Control Plan, the WSA has been revised. The revisions conclude that despite potential water supply reductions during extended droughts, sufficient water supplies will be available to serve the Stanford Campus under the two housing alternatives because (a) Stanford curtails water use during extended droughts; and (b) Stanford has the ability to meet its potable water needs during an extended drought through use of groundwater. County staff has determined, based on the entire record, that projected water supplies will be sufficient to satisfy the demands of the Administration Recommended GUP, in addition to existing and planned future uses. The Administration recommends approval of the Water Supply Assessments for the proposed project and Housing Alternatives A and B.

VII. ADMIN. RECOMMENDATION – DEVELOPMENT AGREEMENT APPLICATION

On June 19, 2018, the Board of Supervisors approved a Zoning Ordinance amendment authorizing the use of development agreements and establishing procedural standards for their adoption and maintenance (See **Attachment S** for Ordinance Section 5.20.230). A development agreement is a voluntary contract entered into by a public agency and applicant and enables a public agency to obtain community benefits from an applicant beyond a level that can be obtained through existing regulations and the exercise of its police powers. Because a development agreement is a voluntary contract, it is not required for purposes of the County’s processing and consideration of the GUP application. The Board of Supervisors would make a decision on a proposed development agreement following a recommendation by the Planning Commission.

Stanford University submitted a development agreement application on July 27, 2018 (**Attachment M**). After the Administration requested information that was not incorporated in the original application, the application was deemed complete by the Administration on October 17, 2018.

At its October 16, 2018 meeting, the Board authorized the Administration to enter into a process for negotiations with Stanford University for a possible development agreement.¹⁸ The Board’s action included the following direction:

- Form an ad hoc committee comprised of Supervisors Simitian and Chavez;
- Provide monthly status reports to the HLUET committee (for HLUET staff reports see **Attachment T**); and

¹⁸ http://sccgov.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=93643

- Publish for public review any negotiated agreements, environmental impact reports, and related staff reports 14 days prior to the Board’s consideration of such an agreement.

The Development Agreement Ordinance does not prescribe a negotiation process, and flexibility and discretion are provided to County negotiators to respond to the specific set of circumstances that may arise for any given negotiation.

The County Ad Hoc Committee and Stanford held their first meeting on November 30, 2018. The purpose of the meeting was to develop ground rules for the negotiations. While the staff of the County and Stanford were negotiating mutually satisfactory ground rules, on January 28, 2019, Stanford submitted the first of two offer letters (**Attachment U**) relating to its GUP application.

January 28, 2019 Offer Letter Analysis

In this offer letter, Stanford proposed the following:

Stanford’s Housing Offer

Stanford proposed to provide 750 total workforce units (200 more units than in its application), of which 600 would be deed-restricted affordable workforce units.

By comparison, the Conditions of Approval require 2,172 total units, of which 1,239 would be market-rate and inclusionary units and 933 would be affordable units. Stanford’s total workforce housing units proposal (750) represented only 34.5% of what the County would require to fully address the housing demand resulting from GUP development.

Stanford’s Transportation Offer

Stanford proposed \$11 million for 17 local bicycle and transit infrastructure projects in Palo Alto, Menlo Park, East Palo Alto, and San Mateo County.

Stanford’s Palo Alto Unified School District (PAUSD) Offer

Stanford proposed to provide \$15.7 million in benefits to PAUSD:

- Stanford would accelerate payment of required affordable housing fee revenue (\$11 million) related to the 2000 GUP. This would not be new funding, merely an acceleration of required funding.

- Stanford would accelerate payment of required school impact fees (\$4.2 million) related to new GUP application. This would not be new funding, merely an acceleration of required funding.
- Stanford would provide \$450,000 in Safe Routes to School improvements. This offer reflected a net value of \$150,000 as \$300,000 in Safe Routes to School improvements were already proposed in Stanford's GUP application.

Stanford-Requested Concessions

In exchange for the items identified above, Stanford sought:

- Rescission of the County's Housing Ordinances.
- Streamlining of certain housing and other projects in the GUP application. Stanford sought to avoid, for example, Architecture and Site Approval (ASA) for proposed housing along El Camino Real in the Quarry District.
- Conditions of Approval and Mitigation Measures that are acceptable to Stanford.
- A requirement that Stanford could determine, based on its consultant's report, the amount of fair share payments it would pay in the event it could not meet No New Net Commute Trip standards in the proposed GUP.
- The ability to transfer the long-term deed restrictions on 400 of the 600 affordable units identified above to other existing or new units on Stanford's lands.
- Trip credits for the 17 bicycle/transit infrastructure improvements it proposed as community benefits.

County staff concluded that Stanford's January 28, 2019 offer letter contained benefits that were not true benefits, and that the remaining actual benefits were insufficient and that concessions requested impaired the County's ability to protect the community from the impacts of the proposed GUP development.

On February 1, 2019, the Ground Rules for development agreement negotiations (**Attachment V**) were approved by both parties and April 15, 2019 was established as the expiration date, although the rules could have been extended with approval by both parties.

A second meeting of the parties was tentatively scheduled for April 30, 2019. The gap in time between the first and second meeting of the parties is due to the fact that County staff

was continuing to prepare the Conditions of Approval (COAs). Establishing the COAs was essential before embarking on negotiations because they establish the regulatory baseline and community benefits are those things that exceed what can be obtained through existing regulations and the exercise of a jurisdiction's police powers.

Negotiations Suspended

The approved Ground Rules called for neither the County nor Stanford to engage in discussions with third parties resulting in a deal that would then be presented as a proposal during the negotiation period. On March 12, 2019, Stanford officials notified the County that it intended to engage in discussions on school benefits with the Palo Alto Unified School District (PAUSD). On April 15, Stanford and PAUSD issued a joint press release stating that a conditional agreement on school benefits had been reached that would go into effect only if Stanford and the County were able to reach agreement on a development agreement.¹⁹ Stanford's actions during the negotiation period violated the Ground Rules because it reached a deal with PAUSD that was connected to and contingent upon the execution of a development agreement between the County and Stanford.

The County notified Stanford on April 16 that it was canceling the April 30 negotiation meeting and suspending negotiations. At the April 18, 2019 HLUET meeting, the Administration announced that the County had suspended the development agreement negotiations with Stanford as a result of the third-party agreement.²⁰

The County communicated to Stanford that the County would consider re-opening negotiations if two conditions were met:

- Future negotiations occur in open and public meetings.
- An agreement between Stanford and PAUSD offering school benefits equal to or greater than those contained in the April 15 conditional agreement and not contingent on a development agreement executed between Stanford and the County.

Stanford officials have not agreed to these conditions.

Meanwhile, County staff continued to process Stanford University's GUP application. County staff held two Planning Commission (PC) study sessions and conducted a hearing over three meetings on May 30, June 13, and June 27.

¹⁹ <https://www.pausd.org/explore-pausd/news/press-release-conditional-agreement-stanford-gup>

²⁰ http://sccgov.iqm2.com/Citizens/Detail_LegiFile.aspx?ID=95844

Stanford's June 24, 2019 Offer Letter

At its June 27, 2019 meeting, the Planning Commission unanimously (7-0) approved staff's recommendations for the GUP application except for one recommendation, denial of Stanford's development agreement application, which was approved (6-1). Before the June 27 Planning Commission meeting and in anticipation of final action by the Planning Commission, Stanford submitted a second offer letter (**Attachment W**) to the County on June 24, 2019.²¹

The County's analysis (**Attachment X**) of Stanford's June 24 offer letter concluded that the value of Stanford's offer of community benefits was \$168.3 million, which represents 3.6% of the \$4.7 billion purported value of the benefits package. In addition, Stanford's offer required that all of its requested revisions to the County's conditions of approval and Community Plan amendments be incorporated.

Stanford's proposed changes to the conditions and Community Plan would result in the loss of important community protections that would enable County staff to recommend approval of Stanford's requested 3.5 million square feet development application.

Stanford's Housing Offer

Stanford proposed the following for faculty/staff housing: 1,307 new faculty/staff units, half credit (650 units) for its already constructed 1,300 units in Escondido Village, and 215 units at its Middle Plaza complex in Menlo Park. The Administration does not view this as a viable offer because the housing at Escondido Village is student housing, not faculty/staff housing, and, furthermore, Escondido Village and Middle Plaza fulfill 2000 GUP-related housing demand, not new housing demand for future development under the current GUP Application. Stanford proposed to build 1,307 of the 2,172 total housing units required in the Administration's recommended Conditions of Approval. This offer is 40% less than the documented demand for housing resulting from the proposed GUP development.

Stanford offered 692 of the 1,131 affordable housing units that are required in the conditions. This offer is 39% less than the documented demand for affordable housing resulting from the proposed GUP development.

The June 24 offer letter also called for the County's Housing Ordinances to be rescinded.

²¹ <http://sccgov.iqm2.com/Citizens/FileOpen.aspx?Type=4&ID=189361&MeetingID=11160>

Stanford's Transportation Offer

Stanford's letter proposed to fund \$30.3 million in pedestrian, bicycle, and transit infrastructure projects near the campus. However, Stanford would also seek to revise the proposed transportation Conditions of Approval to roll them back to the No Net New Commute Trip standard established in the 2000 GUP and eliminate conditions designed to ensure that traffic congestion is not substantially worsened in the Stanford area.

Stanford's September 17, 2019 Letter

After the Board's July recess, Stanford requested a meeting with the County on September 11, 2019. Subsequent to the meeting, Stanford issued a letter to Supervisors Chavez and Simitian on September 17 (**Attachment Y**) to reiterate statements made at the September 11, 2019 meeting.

Stanford continues to seek a development agreement in order to negotiate key housing and transportation conditions to reduce their effect. Stanford continues to seek, for example, negotiating the number of total housing units, location, and timing. The net effect would be to reduce the number of housing units that Stanford would be responsible for establishing over the life of the proposed GUP.

The Administration's position remains that these housing and transportation conditions are important to the Administration's determination that this application is a responsible development proposal and in the Administration's recommendation to the Board that the 3.5 million square foot development application be approved.

Stanford's September 23, 2019 Letter

Before the Board September 24, 2019 Study Session, Stanford submitted a letter to the Board of Supervisors presenting its requests. This letter is, in effect, the September 17 that was sent to Supervisors Chavez and Simitian, but is addressed to the entire Board. This letter is **Attachment Z**.

In summary, County staff concluded that Stanford's two offer letters contained benefits that were not true benefits, and that the remaining actual benefits were insufficient and that the requested concessions could impair the County's ability to make the necessary findings that protect the community from the impacts of the proposed GUP development and enable staff to recommend approval of the GUP. Because a development agreement is not before the Board for its consideration, staff is recommending denial of the development agreement application.

BACKGROUND

The project site consists of approximately 4,017 acres of Stanford University lands in unincorporated Santa Clara County located adjacent to the Cities of Palo Alto and Menlo Park, the Towns of Woodside and Portola Valley, and unincorporated areas of San Mateo County, as shown in **Figure 6 of Attachment L**. The project site includes the University's central campus area located generally north of Junipero Serra Boulevard (1,724 acres) and the largely undeveloped Stanford foothills located generally south of Junipero Serra Boulevard (2,293 acres). It does not include other Stanford lands located in adjacent jurisdictions.

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

Regulatory Overview

Since the 1960s, the County has regulated development of the Stanford University campus through a series of General Use Permits that authorized uses and levels of new development for implementation over a period of years. Stanford University is the only entity the County with a General Use Permit. The site currently operates under the Stanford 2000 GUP, approved by the Board of Supervisors on December 12, 2000. On that date, the Board of Supervisors also adopted the Stanford University Community Plan (SCP) as a component of the General Plan to provide a land use framework for development of the Stanford University campus. The currently proposed GUP is intended to replace the approved 2000 GUP that is nearing full implementation

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

Based on the requirements of the A1 General Use Zoning District, which is applicable to most of the site's central campus area, a Use Permit is required for new academic, academic

support, and housing uses. Because the current application includes Stanford Community Plan and zoning map amendments that require approval by the Board of Supervisors, all three proposed land use approvals are being processed concurrently, with the Planning Commission in an advisory role and the Board of Supervisors as the final decision-maker, consistent with Zoning Ordinance Section 5.10.060.

Public Outreach

The public hearing dates for the proposed General Use Permit and related applications have been noticed in accordance with applicable requirements and augmented with additional efforts. A 45-day notice on the proposed Community Plan amendments was mailed to external agencies on September 6, 2019. A published notice in a newspaper of general circulation was provided in the Palo Alto Weekly on September 13, 2019. A public notice was mailed to all nearby property owners on September 19, 2019. A courtesy email notice has been provided to interested parties on the County's Stanford opt-in list and was sent on October 1, 2019. Due to high levels of public interest, a new dedicated website (CountyStanford.info) was also established to provide additional public notice and information opportunities.

Responses

The County's environmental consultant, ESA, has prepared responses to CEQA-related comments from the Planning Commission hearings. The response to comments is included in this report in the First Amendment to the Final EIR (**Attachment AA**).

Changes made to the Conditions of Approval since the June 27, 2019 PC Hearing are included in the entire text of the Administration's Recommended General Use Permit Conditions of Approval (**Attachment I**) as tracked changes.

At the September 24, 2019 Board of Supervisors Study Session, staff received requests from the Board on the following information:

- **A1 Zoning – Attachment BB.**
- **Locations of Stanford lands in other jurisdictions – Attachment BB;**
- **Escondido Village** in relation to the 2000 General Use Permit – **Attachment BB;**

Next Steps

The Public Hearing before the Board of Supervisors on the Stanford University GUP Application will continue over the following meeting dates:

- Tuesday, October 22, 2019 at 6:00 p.m. at the Palo Alto City Council Chambers; and
- Tuesday, November 5, 2019 at 1:30 p.m. at the County Government Center.

The Board of Supervisors may take formal action on any of the meeting dates.

LINKS:

- **Linked From:** 98755 : Public Hearing to consider the following: Stanford University's General Use Permit (GUP) Application (Application), Stanford GUP Environmental Impact Report (EIR), Water Supply Assessment, Stanford University Community Plan amendments, Zoning Ordinance amendments, and Development Agreement application. Location: Stanford University Community Plan Area. Zoning: A1 General Use, R1S Low-Density Campus Residential, R3S Medium-Density Campus Residential; OS/G Open Space and Field Research; SCA Special Conservation Area. Supervisorial District: 5. File Nos. PLN98-7165 (7165-98P-99GP-99EIR), PLN16-7165 (7165-16P-16GP-16Z-16EIR), and PLN18-7165 (7165-18DA)
- **Linked To:** 95443 : 95443
- **Linked To:** 96492 : 96492
- **Linked To:** 96765 : 96765
- **Linked To:** 97428 : 97428
- **Linked To:** 97596 : 97596

ATTACHMENTS:

- Attachment A - Stanford GUP EIR [Website link] (PDF)
- Attachment B - CEQA Findings [Placeholder] (PDF)
- Attachment C - Water Supply Assessment [Placeholder] (PDF)
- Attachment D - Statement of Overriding Considerations [Placeholder] (PDF)
- Attachment E - Mitigation Monitoring and Reporting Program [Placeholder] (PDF)
- Attachment F - Stanford Community Plan text and land use map amendments (PDF)
- Attachment G - SCP, Zoning, and GUP Findings (PDF)
- Attachment H - Zoning Ordinance Map Amendments and Draft Ordinance [Placeholder] (PDF)
- Attachment I - Department Recommended GUP Conditions of Approval [Placeholder] (PDF)
- Attachment J - Planning Commission Recommendations & Requests for Analysis [Placeholder] (PDF)
- Attachment K - Stanford's GUP Application Project Description [Placeholder] (PDF)
- Attachment L - Figures (PDF)
- Attachment M - Stanford's Development Agreement Application and Application Clarification Letter(PDF)
- Attachment N - EIR Table 7-4 - Comparison of Impacts of the Proposed Project and Alternatives (PDF)
- Attachment O - April 2018 KMA Nexus Study (PDF)
- Attachment P - Reverse Commute Report [Placeholder] (PDF)
- Attachment Q - Transportation Demand Management Report [Placeholder] (PDF)
- Attachment R - Average Daily Trips Report [Placeholder] (PDF)
- Attachment S - Ordinance Code__5.20.230.___Development_agreements. (PDF)
- Attachment T - HLUET Staff Reports Development Agreement (PDF)
- Attachment U - Stanford DA Offer Letter 1.28.19.docx (PDF)
- Attachment V - DA Final Approved Ground Rules 2.1.19(PDF)
- Attachment W - Stanford DA Offer Letter 6.24.19 (PDF)
- Attachment X - County Analysis of Stanford 6.24.19 DA Offer Letter (PDF)
- Attachment Y - Stanford's Framework for Predictability Letter 9.17.19(PDF)
- Attachment Z - Stanford 09.23.19 BOS Letter and Attachments (PDF)
- Attachment AA - First Amendment to the Final EIR [Placeholder] (PDF)
- Attachment BB - BOS Referral Response from 9.24.19 (PDF)
- Updated - Attachment G - SCP Zoning and GUP Findings (PDF)
- Updated - Attachment K - Stanford's GUP Application Project Description (PDF)
- Updated-Attachment C - Water Supply Assessment (PDF)
- Updated-Attachment D - Statement of Overriding Considerations (PDF)
- Updated-Attachment B - CEQA Findings (PDF)

- Updated-Attachment E - Mitigation Monitoring and Reporting Program (PDF)
- Updated-Attachment H - Zoning Ordinance Map Amendments and Draft Ordinance (PDF)
- Updated-Attachment J - Planning Commission Recommendations & Requests for Analysis (PDF)
- Updated-Attachment AA - First Amendment to the Final EIR (PDF)
- Updated-Attachment I - Department Recommended GUP Conditions of Approval (PDF)
- Updated-Attachment P - Reverse Commute Report (PDF)
- Updated-Attachment Q - Transportation Demand Management Report (PDF)
- Updated-Attachment R - Average Daily Trips Report (PDF)
- Stanford GUP-BOS Public Hearing Presentation (PDF)
- 10.08.19 Errata Correction Memo for BOS Meeting (PDF)

HISTORY:

10/08/19
10/22/19

Board of Supervisors

CONTINUED [NO VOTE]

Next: