

February 22, 2019

Ms. Jacqueline Onciano  
Director of Planning and Development  
Santa Clara County  
County Government Center  
70 West Hedding Street  
San Jose CA 95110

RE: City of Palo Alto, Stanford University 2018 General Use Permit Development Agreement

Dear Ms. Onciano,

The City of Palo Alto appreciates this opportunity to provide comments regarding ongoing discussions related to the Stanford University General Use Permit and Development Agreement. The City, Santa Clara County and Stanford University share a long history and have mutually benefited from one another. While the City may have different interests than Stanford University or Santa Clara County, we are aligned in ensuring the proposed expansion does not compromise the vitality of the area, diminish the quality of its neighborhoods or negatively impact community services.

The Palo Alto City Council discussed the proposed project on February 4, 2019 and is concerned that the proposed project will detrimentally impact the City; some of these impacts include the following:

- **Transportation.** The project relies heavily on insufficient local and regional mass transit for access to and egress from Stanford University,
- **Traffic.** All last mile trips to Stanford University by all modes run through Palo Alto, not just at peak hours, so many of our intersections and connections will be impacted,
- **Housing.** The project adds more jobs than housing increasing local demand for affordable housing in Palo Alto,
- **Services.** Many of Palo Alto's community services, such as libraries and parks, are impacted by additional growth.

To facilitate a dialogue and foster a collaborative approach for addressing these challenges, the Mayor has formed an ad hoc committee that welcomes an opportunity to engage the Board of Supervisors' ad hoc committee and Stanford University representatives. Below is a list of interests the City requests be incorporated into any development agreement or conditions of approval:

P.O. Box 10250  
Palo Alto, CA 94303  
650.329.2477  
650.328.3631 fax

1. Plan for Improved Transit Access:  
**Stanford to contribute \$1 million toward the preparation of a Downtown Coordinated Area Plan that includes design concepts to improve and modernize the intermodal Transit Center and access to the campus.** The plan would integrate the shared gateway needs for Stanford University, Palo Alto, CalTrain, Eastbay Express, SamTrans and Santa Clara County Transit. The plan would address grade separation alternatives at Palo Alto Avenue, changes to the CalTrain station to accommodate electrification, and improvements to multi-modal functionality, including pedestrians and bicycles. Together these improvements would provide significant transit enhancement that benefit both riders and transit providers. Stanford University is a major land owner within this study area and their students and Affiliates are heavy users of the transit system.
2. Construct Transit Center Improvements:  
**Establish a cost-sharing framework to implement the Downtown Coordinated Area Plan's intermodal Transit Center improvements.** Stanford students and affiliates are heavy users of the Transit Center. Stanford is a prominent land owner in the area and shares a responsibility to plan for and implement physical improvements that benefit the Marguerite Shuttle (Stanford), East Bay Express, VTA, Sam Trans, City of Palo Alto Shuttle, and CalTrain.
3. Fair Share Funding for Grade Separations in Palo Alto:  
**Stanford to pay fair-share costs of new grade separations and improvements to existing grade separations in Palo Alto, including costs associated with preparing a study to determine proportional impacts at each crossing and costs of infrastructure improvements.** There are four intersections in Palo Alto that will need to be considered for new grade separation because of electrification of CalTrain: Palo Alto Avenue, Churchill, Meadow, and Charleston. Two of these roads are sufficiently close that the grade separation may be a single solution. The Palo Alto Avenue grade separation will be driven by the outcome of the Downtown Coordinated Area Plan. In addition, there are three existing grade separations: San Antonio Road, Oregon Expressway and Embarcadero Road located at a major entrance to Stanford. Since grade separation will impact existing Stanford users and future project related traffic, Stanford shares the responsibility for cost sharing improvements for needed infrastructure improvements.
4. Six-Mile Radius for Allocation of Affordable Housing:  
**Funds raised for affordable housing to be spent within a six (6) mile radius of the Academic Growth Boundary.** The 2000 GUP had a restriction that any affordable housing funds collected by the County were to be used for projects that were located within six miles of the Academic Growth Boundary. This restriction should be continued in the 2018 GUP.

5. Long Term Preservation of the Foothills from Development:  
**Academic or academic support development, including housing, prohibited in the Foothills area until 2100.** As noted in the recent Stanford University Sustainable Development Study Supplement, there is no immediate or long term need for Stanford development within the foothills. To the extent the County supports limited development, the City seeks to extend and strengthen the 2000 GUP provisions that required a supermajority 4/5<sup>th</sup> vote by the Supervisors.
  
6. Fair Share Funding for Roadway Impacts:  
**Require Stanford to pay an on-going fair share contribution for maintenance to local Palo Alto streets that provide access to the Academic Growth Boundary.** It has been documented that more localized trips and reverse commute trips can be anticipated with the 2018 GUP and that more on campus housing will have the greatest traffic impact on the 'last mile' in the City of Palo Alto. The County's recirculated DEIR concludes that in addition to the proposed 2.275 million square feet of academic space creating jobs, approximately 2,500 additional on-campus housing units are needed to meet increased housing demand generated by the proposed development. In addition, the Supervisors may require additional housing on campus. Whatever mode these Stanford Affiliates use, they will all use the 'last mile' of Palo Alto roadways to get to the campus.
  
7. Palo Alto Local Transit Support:  
**The City requests expansion of the Marguerite Shuttle service in order to include more locations in Palo Alto that will reduce automobile trips to campus.** The goal in the 2018 GUP of keeping No Net New Commute Trips to the level of 2000, will require Stanford to enhance the effectiveness of its transportation demand management (TDM) measures. One of these measures should be to expand service from more distant neighborhoods and locations within Palo Alto so that those now driving to campus can use mass transit.
  
8. Fair Share Funding for Impacted Parks and Libraries:  
**In addition to the one-time \$375,000 payment offered by Stanford for improvements to off-set impacts to four parks<sup>1</sup> in the College Terrace neighborhood, Stanford to pay an annual park maintenance cost of \$54,000 and a one-time contribution of \$100,000 to the expansion of the College Terrace Library Branch.** Stanford's park usage studies and City library circulation data indicate a substantial use of neighborhood parks and the City library branch in College Terrace. Over 2,200 current Stanford affiliates and their families reside within the academic growth boundary and enjoy the privileges of the Palo Alto library system. This number will increase with the 2018 GUP. Stanford has offered the City a \$375,000 one-time payment for improvements to the four neighborhood parks located in the College Terrace. Stanford also shares a responsibility for ongoing maintenance of these four parks and Peers park in the Evergreen Park

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<sup>1</sup> College Terrace Neighborhood Parks: Werry, Weisshaar, Cameron and Mayfield Parks.

neighborhood, which is also impacted – estimated at \$54,000 annually. Moreover, an expansion is anticipated to the College Terrace library branch due in part to existing and new Stanford Affiliate use of the library system. The estimated cost for the library expansion is \$900,000; the City requests Stanford contribute \$100,000.

9. Residential Neighborhood Parking Impacts:

**Require Stanford to contribute up to \$300,000 per affected neighborhood for a parking study, the initial administrative costs for establishing a residential preferential parking (RPP) program and related infrastructure.** A major contributor to the TDM program that is a part of the No Net New Commute Trips is the Stanford's Marguerite Shuttle service. Because of strict limitations to on-campus parking, residential neighborhoods both close to the campus and further away adjacent to Marguerite stops are impacted by Stanford Affiliates parking to take the shuttle. Should a parking survey document that Stanford related parking is a contributor to a neighborhood parking problem, Stanford must be required to pay its fair-share toward the creation of the RPP solution for that neighborhood.

10. Bol Park Pathway and Access Improvements:

**Supplement the \$250,000 offered by Stanford for the Bol Park Path improvement with the right to use Stanford land adjacent to Hanover Street between California Avenue and Page Mill Road for a new bicycle/pedestrian path and require Stanford to develop a safe connected pathway system through the Stanford Research Park to Gunn High School and the Veterans Administration Hospital.** The City requests that the Bol Park Pathway funding of \$250,000 proposed by Stanford be applied to upgrade the current bicycle/pedestrian improvements on both the Upper and Lower Bol Park Pathway, including trail lighting. In addition, that Stanford dedicate to the City the right to use their land for bicycle/pedestrian improvements along Hanover Street, between California Avenue and Page Mill Road. To receive the full TDM benefit from the investment at Bol Park Pathway a safe connected pathway system through the Stanford Research Park to Gunn High School and the Veterans Administration Hospital is appropriate and would be used by Stanford Affiliates and their families destined for the Research Park as well as PAUSD students.

11. Bicycle/Pedestrian Safety and Crossing Guards:

**Stanford to contribute to the City of Palo Alto \$50,000 for a fair-share of the updates to Crossing Guard Studies through 2035 and, based on the number of crossing guards required at Stanford impacted intersections, pay an additional \$75,000 for a maximum of five crossing guards.** In those areas close to the central campus and heavily used by Stanford Affiliates and their families on foot and bicycle, Stanford has a responsibility to contribute to the cost toward determining the need and location for crossing guards and to support on-going program costs.

The City of Palo Alto also requests that the County acknowledge and support the requests for a place in the Development Agreement for the following issues and agencies whose requests or actions are essential to the quality of life in our community.

12. Support for Palo Alto Unified School District (PAUSD):

**The City of Palo Alto supports PAUSD and the need for Stanford University to fully mitigate its impacts to the school district.** The City of Palo Alto supports PAUSD and reasonable solutions to address project related impacts.

13. San Francisquito Creek Joint Powers Authority -Upstream Flood Water Detention:

**Stanford University has responsibility for and should be required to manage the drainage from upstream areas on its land in order to address downstream flooding by implementing the recommendations of the San Francisquito Creek Joint Powers Authority.** Parts of Palo Alto are subject to flooding from San Francisquito Creek. Stanford controls the upstream drainage area for San Francisquito Creek. The San Francisquito Creek Joint Powers Authority (SFCJPA) including Palo Alto is completing construction of two major flood control capital projects downstream of Stanford that will be less effective and will impact Palo Alto residents without Stanford's participation.

14. 1985 Agreement among Santa Clara County, Stanford University, City of Palo Alto

**The three party protocol implementing administrative responsibilities between Santa Clara County, Stanford University and the City of Palo Alto requires updating soon after the action on the 2018 General Use Permit.** Palo Alto requests that the three party agreement or Protocol required in the County's original 1985 Use Permit with Stanford be immediately updated after the Stanford 2018 General Use Permit amendment is approved.

A number of the City of Palo Alto's concerns are directly related to the project and should be addressed with the project. These concerns are listed below in the format of conditions of approval. The City requests that these conditions be included in the Project approval.

15. ZONING AND NOISE REGULATION. The City of Palo Alto development standards, construction noise regulations and noise regulations addressing operation of buildings shall be enforced by Santa Clara County on all properties within the Academic Growth Boundary that are located within 150 feet of the Palo Alto City boundary.

16. CONSTRUCTION PARKING. For each construction project, Stanford University shall submit an on-campus Staging and Parking Plan that addresses on-campus parking for all construction equipment and workers. As a part of the plan and for the duration of the construction, continuous emergency access to the site and past the site to the surrounding campus area shall be required. Stanford University shall be responsible for enforcing the emergency access availability, and the contactors and workers compliance. Failure to do so shall result in County enforcement and/or stopping construction until the emergency access and parking problems are addressed.

17. TRAFFIC MODEL MODIFICATION (No Net New Commute Trips). The model used to determine the No Net New Commute Trips generated in the peak hours by Stanford

University shall be modified to include: extension of hours measuring trips at the cordon locations; include in the NNNCT computation as trips generated by Stanford, peak hour trips entering and exiting through the same or immediately adjacent gateways; and require Stanford to share collected NNNCT and compliance data with the City of Palo Alto at least twice a year.

18. **TRANSPORTATION DEMAND MANAGEMENT.** Stanford shall work with the City of Palo Alto to coordinate, share information and evaluate each jurisdiction's transportation demand management programs and resources.
19. **I-280/PAGE MILL ROAD INTERSECTION.** In lieu of a signal at the intersection of I-280 and Page Mill Road, Stanford shall pay its fair share to install a round-about as included in the County of Santa Clara Roads and Airports Department, Page Mill Road Expressway Corridor Study.
20. **BOWDOIN/STANFORD AVENUE INTERSECTION.** To address bicycle, pedestrian and traffic safety at the boundary of Stanford and the City, Stanford University shall jointly fund with the City of Palo Alto the planning and the construction costs of bicycle and pedestrian safety improvements at Bowdoin and Stanford Avenues. The planning work shall be commenced within two years of project approval.
21. **SPECIAL EVENT PLANNING AND NOTIFICATION.** Stanford shall work with County and Palo Alto City staff to prepare a Special Events Traffic Management Plan addressing parking and traffic impacts caused by special events on the Campus. This plan shall be approved by the County and City of Palo Alto and implemented within a year of project approval.
22. **EVENT FACILITIES.** Any academic support space built by Stanford that shall serve large group events such as stadiums, auditoriums and performance venues shall be subject to additional environmental evaluation and traffic and parking impact studies. These studies shall be submitted to the City of Palo Alto for review before the project proceeds.
23. **REDISTRIBUTION OF DEVELOPMENT AMONG UNIVERSITY DEVELOPMENT DISTRICTS.** No more than twenty (20) percent of the floor area by type of use approved in the 2018 General Use Permit and Stanford Community Plan may be transferred from one to another Development District without additional environmental review and notification of the City of Palo Alto.
24. **FIREWORKS.** Stanford University shall be limited to two fireworks events a year, unless otherwise allowed by approved Santa Clara County and City of Palo Alto Special Events Permits. For all fireworks displays, notice shall be published in a newspaper of general circulation in Palo Alto and Menlo Park.

25. HOUSING PRODUCTION AND NEW ACADEMIC SPACE. Stanford University shall not receive a building permit for any expansion of academic and academic support space unless the University can demonstrate that the housing need generated by the new square footage is available and/or provided.

26. PARKING RESERVE FOR THE 2018 GUP PROJECT. On campus parking to support new academic and academic support square footage permitted in the 2018 General Use Permit shall be limited to the amount of parking allowed for the square footage of academic and academic support uses in the 2000 General Use Permit. Parking as allowed by the County shall be provided for all residential uses, except for undergraduate housing, where no additional parking shall be provided.

On behalf the Palo Alto City Council, thank you again for considering the above requests and we look forward to our continued engagement on these important issues.

Sincerely,



Eric Filseth, Mayor

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Copies to:

Members of the Santa Clara County Board of Supervisors  
Palo Alto City Council Members  
Sylvia Gallegos, Deputy Santa Clara County Executive  
Kavitha Kumar, Senior Planner, Santa Clara County  
Geoff Bradley, Consulting Project Manager, Santa Clara County  
Gary Kremen, Chair San Francisquito Creek Joint Powers Authority  
Catherine Palter, Associate Vice President at Stanford University  
Ed Shikada, City Manager, City of Palo Alto  
Jonathan Lait, Director, Planning and Community Environment, City of Palo Alto  
Sandra Lee, Assistant City Attorney, City of Palo Alto