



CITY OF MOUNTAIN VIEW

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September 10, 2019

Santa Clara County Board of Supervisors
70 West Hedding Street, Tenth Floor
San Jose, CA 95110

STANFORD UNIVERSITY CAMPUS GENERAL USE PERMIT (GUP) AND FINAL ENVIRONMENTAL IMPACT REPORT (FEIR)

Thank you for the opportunity to review the latest information on the proposed Stanford University Campus General Use Permit (GUP) and Final Environmental Impact Report (FEIR), including the County's proposed conditions. This letter includes the City of Mountain View's response and comments related to potential housing- and transportation project-related impacts. While we detail specifics below, our overall message is that Stanford should fully mitigate the residential and transportation impacts of its proposed development.

HOUSING

The City of Mountain View Supports New Housing on the Stanford Campus

The City of Mountain View supports Stanford constructing all of the project's 3,150 housing units on its campus to fully mitigate the impacts from over 2 million square feet of proposed academic facilities. The City also understands that the County's March 12, 2019 conditions of approval require a minimum of 2,172 units and a maximum of 2,892 units be provided on-campus, which is less than Stanford's proposal, and that the Environmental Impact Report (EIR) Housing Alternative A would include 5,699 units on-campus.

Providing on-campus housing would be a leading step by Stanford to help address our region's housing crisis and reduce potential transportation impacts by allowing faculty, staff, and students to walk or bike to work. If new housing is not constructed on campus, then there would be greater housing and transportation impacts to the City of Mountain View and other nearby cities. The City appreciates Stanford providing all of its housing on-campus to fully mitigate the significant residential impacts from its proposed academic facility expansion.

The City is committed to addressing our housing needs and helping respond to the region's housing challenges. The City has issued building permits for 2,436 housing units between 2015 and 2018, which is over 80 percent of our required 2015 to 2023 Regional Housing Needs Assessment (RHNA) total. To date, in 2019, the City Council has approved over 1,300 net new housing units, and there are nearly 3,000 units under review. Additionally, the City Council recently approved its North Bayshore Precise Plan, which allows up to 9,850 new units, and will be considering the East Whisman Precise Plan, which may allow up to 5,000 new units. Both Precise Plans have a 20 percent affordable housing goal.

Stanford Off-Campus Housing

The City of Mountain View has concerns regarding one of the project's conditions of approval that would allow Stanford to construct some of its required market-rate and affordable housing units within a six-mile radius of its campus. Enclosed is a map for your reference showing this radius from the University's Academic Growth Boundary extending over the entire City of Mountain View. Housing built in Mountain View or in surrounding jurisdictions by Stanford for its employees would exacerbate local and regional traffic and environmental issues.

As noted above, we strongly believe that Stanford University should be required to fully address its residential impacts by building all of its housing on-campus. If the University does not build all of the housing on-campus, it should fully cover the cost of any mitigation necessary to address impacts associated with housing built off-campus.

TRANSPORTATION

Transportation Impact Analysis

As indicated in the Transportation Impact Analysis (TIA) dated August 2018, the Stanford 2018 GUP has the potential to generate a substantial number of new trips into and out of the University area. The proposed approach to avoid worsening traffic congestion with these new trips is a No Net New Commute Trips (NNNCT) goal. Mountain View is generally supportive of the NNNCT concept. However, the application of NNNCT for the 2000 GUP was applied only to peak hour/peak direction, which did not fully address the potential for Stanford's growth to worsen traffic congestion. Increased traffic congestion in Santa Clara County is leading to peak spreading, resulting in peak periods that are at least three hours long. In addition, trips leaving Stanford also contribute to traffic congestion in neighboring cities. For these

reasons, Mountain View concurs with the proposed Condition of Approval to expand the NNNCT approach to the peak hour and peak period in both the commute and reverse commute directions and to limit growth in average daily traffic.

The key to achieving the expanded NNNCT goal will be to support and promote walking, biking, and transit to access the University. Stanford has developed a robust Transportation Demand Management (TDM) program that includes on-campus infrastructure, financial incentives, and the Marguerite shuttle system to promote commute alternatives. To be truly successful with their TDM program and meet the NNNCT goal, Stanford needs to invest in active transportation infrastructure in neighboring cities.

The TIA indicates that nearly 8 percent of automobile in-commute trips into Stanford originate in Mountain View, and nearly 7 percent of Stanford residents drive to Mountain View. A good portion of Mountain View is within five miles of the campus, and all other locations in Mountain View are less than two miles from one of the two Caltrain stations in Mountain View and/or the Santa Clara Valley Transportation Authority (VTA) frequent bus service on El Camino Real. This makes bicycling and bicycling/transit viable options for all trips between Mountain View and Stanford. Yet, 60 percent to 70 percent of the commute trips between Mountain View and Stanford are single-occupant vehicles (SOVs). If Stanford is to meet its NNNCT goals for travel to and from Mountain View, a significant shift of existing commuters from SOVs to bikes and transit will be required and/or all new trips due to the 2018 GUP growth will need to be by bike and transit.

City of Mountain View Requests

The City requests consideration of the following investments in infrastructure and services by Stanford to support use of commute alternatives for Stanford-generated trips traveling to and from Mountain View:

- A contribution for bike improvements identified in Mountain View's 2015 Bicycle Transportation Plan that will serve bicyclists traveling to Stanford University, the Mountain View and San Antonio Caltrain stations, and VTA transit along El Camino Real. This includes adding Class IV protected bikeways and Class II buffered bike lanes along El Camino Real, California Street, Shoreline Boulevard, Evelyn Avenue, and Middlefield Road. These improvements are estimated to cost approximately \$110 million. The City is prepared to work with the County and Stanford to determine an appropriate fair share contribution.

- A fair share contribution to planning, design, and construction of the Peninsula Bikeway between Redwood City and Mountain View. Three alternative alignments for this bikeway are currently under study: El Camino Real, Middlefield Road, and the Caltrain corridor. No matter which alignment is selected, the Peninsula Bikeway will greatly improve bicycle access to Stanford University. The City appreciates that Stanford is participating in the Managers Mobility Partnership with the city managers from Mountain View, Palo Alto, Menlo Park, and Redwood City, which is spearheading the Peninsula Bikeway project. Stanford should commit to becoming an equal-share funding partner with the four cities for the planning, design, and construction of the project.
- A contribution to the Castro Street grade separation project. According to the 2018 GUP FEIR, the closure of the Castro Street crossing of the Caltrain tracks and construction of the bicycle/pedestrian undercrossing of Central Expressway and the tracks is an identified mitigation measure for the significant impacts to the Central Expressway/Moffett Boulevard intersection. The FEIR also states that this project will significantly improve bicycle and pedestrian quality of service (QOS) for connecting with the Transit Center and downtown Mountain View. The FEIR further indicates that if Mountain View does not pursue closure of Castro Street, Stanford will contribute a fair share toward an intersection improvement to mitigate the significant impact, but this fair share contribution is only required if Stanford fails to meet the NNNCT goal. The FEIR also allows that the City could use this contribution toward the Castro Street closure/grade separation project. Mountain View requests that Stanford be required to make this fair share contribution to the closure/grade separation project in addition to meeting the NNNCT goal. This investment in improved bike/pedestrian access to the Caltrain station will help Stanford promote access to Stanford University via Caltrain without increasing traffic congestion in the vicinity of the Mountain View Transit Center. The intersection improvement identified in the FEIR will likely cost approximately \$3 million, and the 2018 GUP would increase delay by 18.75 percent, leading to a fair share contribution of \$562,500.
- Contributions to the Rengstorff and Castro Grade Separation Projects to offset the impacts created by more frequent Caltrain service. Mountain View has reviewed the City of Palo Alto's letter dated June 27, 2019 that demonstrates how Stanford's reliance on Caltrain to achieve its NCCCT goal has an indirect impact on the traffic congestion and safety on City streets for the at-grade crossings. Palo Alto has indicated that Stanford's fair share contribution to their grade separation projects should be 19.5 percent of the project costs. Mountain View will also suffer the same level of impacts as Palo Alto. The estimated total cost for the City's

Rengstorff and Castro Grade Separation projects is \$220 million, 19.5 percent of which is \$43 million. Should it be determined that Stanford should pay a fair share toward the grade separations in Palo Alto, Mountain View requests to receive a similar fair share for our grade separations.

- Expand shuttle services connecting Mountain View with Stanford. Mountain View has initiated a Citywide shuttle study to identify potential service improvements for the Mountain View Community Shuttle and opportunities to consolidate or partner with other existing shuttle services. The San Antonio area is a prime candidate for expanded shuttle services that could also serve Palo Alto and Stanford. Stanford's Marguerite Shuttle system currently provides a limited "Shopping Express" route to the San Antonio Shopping Center. Mountain View recommends that Stanford expand this shuttle service to provide more connections into Mountain View or provide funding to either the City of Mountain View or Mountain View Transportation Management Association (TMA) for expanded shuttle services.

In sum, the City's priority is to ensure that any housing or transportation impacts caused by the proposed project will be fully mitigated and will not negatively impact the quality of life in the City of Mountain View and neighboring communities. Stanford is a tremendous asset to the region and has a unique opportunity to address this project's impacts and to play a leading role in addressing the broader housing, transportation, and sustainability issues facing our region.

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On behalf of the Mountain View City Council, thank you for considering our perspective. If you have any questions, please contact our City Manager, Dan Rich, at 650-903-6301. Thank you for your time and consideration.

LISA MATICHAK
MAYOR

LM/JR/6/CDD
001-09-10-19L

Enclosures: Map with Six-Mile Radius from Stanford's Academic Growth Boundary
Previous Letters from the City of Mountain View

cc: Lucy Wicks, Director, Community Relations, Stanford University
Jacqueline Onciano, Director of Planning and Development, Santa Clara County
Geoff Bradley, Santa Clara County, Department of Planning and Development
City Council, CM, CDD, PWD




Potential Impacts of the Stanford GUP

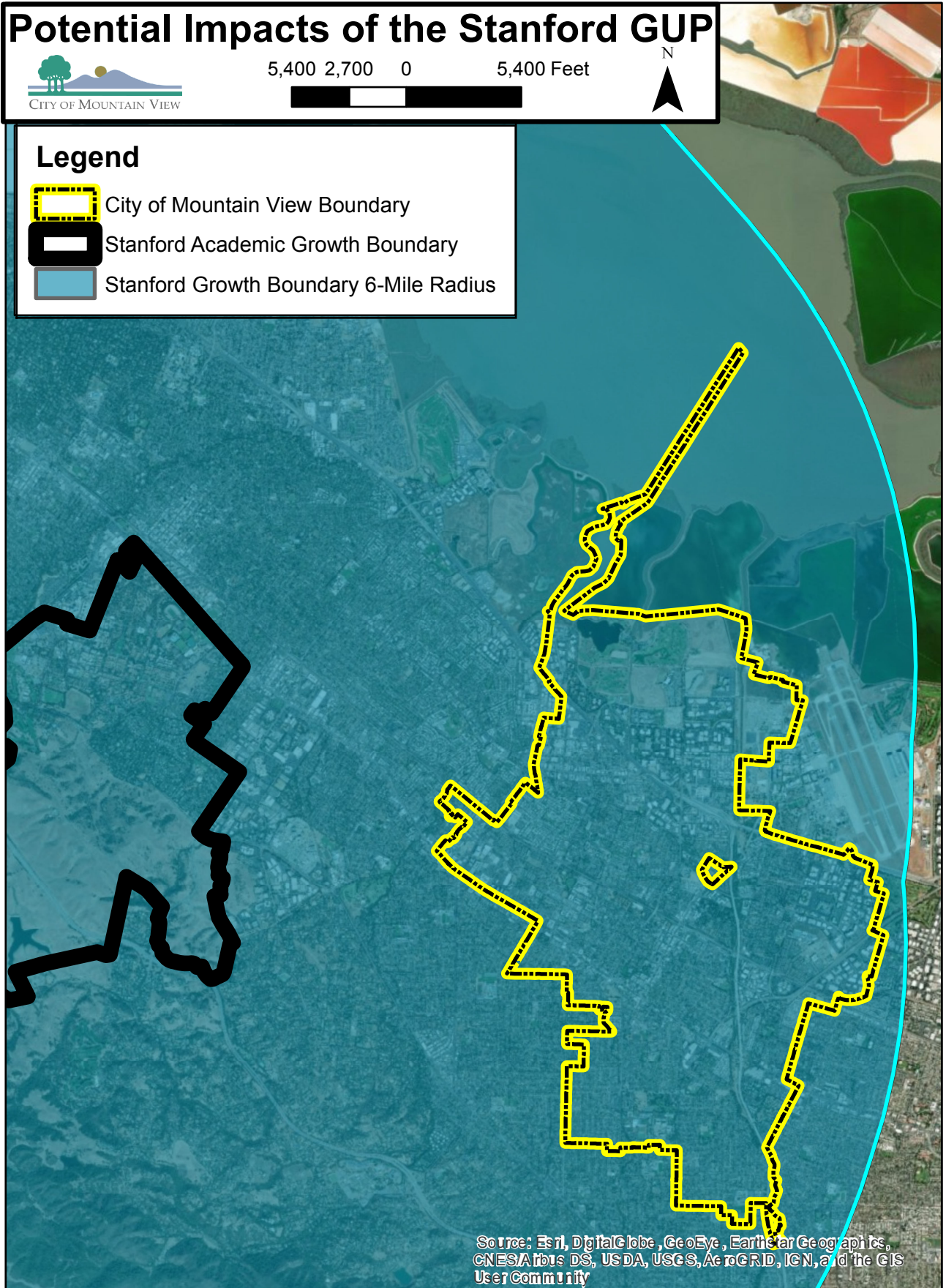


5,400 2,700 0 5,400 Feet

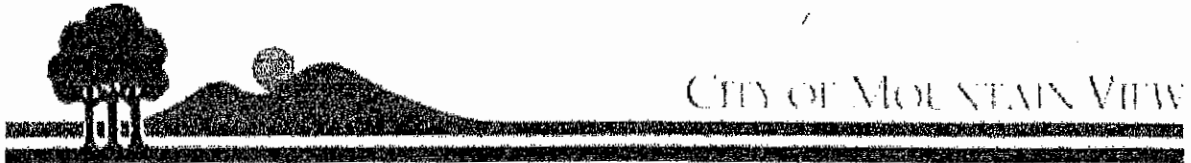


Legend

-  City of Mountain View Boundary
-  Stanford Academic Growth Boundary
-  Stanford Growth Boundary 6-Mile Radius



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



CITY OF MOUNTAIN VIEW

COMMUNITY DEVELOPMENT DEPARTMENT • PLANNING DIVISION
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December 12, 2017

David Rader
Santa Clara County Planning Office, County Government Center
701 W. Hedding Street, 7th Floor, East Wing
San Jose, CA 95110

Re: **STANFORD UNIVERSITY 2018 GENERAL USE PERMIT - DRAFT
ENVIRONMENTAL IMPACT REPORT (SCH#2017012022)**

Dear Mr. Rader:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the Stanford University General Use Permit (GUP), including the presentation that was made to the City's Environmental Planning Commission on November 1, 2017. The City of Mountain View has the following comments on the DEIR:

1. Transportation & Traffic

Intersection ID No. 83 Charleston Road/San Antonio Road is under the jurisdiction of the City of Palo Alto (not Mountain View) as shown on the tables.

Table 1 on Page 5.15-86 notes that the planned closure of Castro Street at the train tracks would mitigate the Project impact for the Central Expressway/Moffett Blvd intersection (Intersection ID No. 89) and lists a back-up mitigation of fair-share funding for an intersection improvement should the Castro Street closure project not be implemented. The planned closure of Castro Street and related improvements (bicycle/pedestrian undercrossing of Central Expressway and a new access ramp from Evelyn Avenue to Shoreline Blvd) are part of the Mountain View Transit Center Master Plan approved by the Mountain View City Council on May 23, 2017. These improvements will be primarily, but not fully, funded by VTA's Measure B Sales Tax Program.

The City requests that the fair-share funding allocation planned for the back-up mitigation measure be made available for the Castro Street closure improvements consistent with the DEIR's statement that these improvements will mitigate the Project's significant impact at the Central Expressway/Moffett Blvd intersection. These improvements are also consistent with the priority that the trip fees collected from Stanford be used for transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users.

2. No Net New Commute Trips

The City supports the proposal to continue the No Net New Commute Trips required condition for development on campus. The City encourages the Draft EIR to study the ability to reduce

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December 12, 2017
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commute trips or vehicle miles traveled created by other workers directly or not directly employed by Stanford University (i.e. workforce or contracted staff), instead of trips made only by students, faculty, and staff.

3. Affordable Housing Funding Availability

Affordable housing continues to be a primary concern for the region, and the City requests that Santa Clara County maximize the funding collected for housing supply to be distributed not only among students, faculty and staff housing needs, but also for other workers (temporary, casual, part-time, and etc.) that work or will work within the General Plan Use permit area. The City also asks that the County consider allowing a portion of funds for affordable housing projects to be distributed outside the 6-mile radius of campus to allow a larger portion of neighboring jurisdictions to accommodate increased workforce housing demands.

4. Historic and Cultural Resources

The City is supportive of Stanford University's proven commitment to maintaining historic and cultural resources with the Academic Growth Boundary, and we encourage that commitment to continue with the General Use Permit 2018.

5. Rideshare Technology


How does the DEIR address the commuting trips created by private ride-hailing services (i.e. Uber, Lyft, and etc.)? Are these counted as single occupancy trips?

6. GUP Outreach

The City applauds Stanford University and the County of Santa Clara for their commitment to giving the public multiple opportunities to comment on the various phases of this project review. The City suggests that expanded translation services be offered at future outreach meetings.

If you have any questions, please do not hesitate to contact me at (650) 903-6306 or my staff via email at taryn.toyama@mountainview.gov.

Sincerely,



Randal R. Tsuda, AICP
Community Development Director

CC: Dan Rich, City Manager
City Council
Environmental Planning Commission



CITY OF MOUNTAIN VIEW

OFFICE OF THE CITY MANAGER

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July 17, 2018

Mr. David Rader
Santa Clara County Planning Office, County Government Center
70 West Hedding Street, 7th Floor, East Wing
San Jose, CA 95110

RECIRCULATION OF A PORTION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE STANFORD UNIVERSITY 2018 GENERAL USE PERMIT (STATE CLEARINGHOUSE # 2017012022)

Dear Mr. Rader:

Thank you for the opportunity to review and comment on the recirculated portions of the Draft Environmental Impact (DEIR) for the Stanford University General Use Permit. Mountain View staff have the following comments on the DEIR:

Colocating Housing Near Jobs

As the City with the second highest percentage (nearly 10 percent) of off-campus students, faculty and staff from Stanford University who do not call the campus home, the City of Mountain View is very supportive of placing as much additional housing on the Stanford University Campus as possible. Adding housing opportunities for the University's faculty, staff, and students on campus would reduce their commute distances/times, help increase their productivity, increase their quality of life, and also benefit the surrounding communities. The City is very interested in colocating housing near jobs and employment centers, and is doing its share by planning a significant increase in housing—up to 15,000 housing units with at least 20 percent of those as affordable housing—in the major employment centers of North Bayshore and East Whisman. We appreciate the University's leadership in helping to address the need for adding housing in the right locations.

Fair-Share Funding

We would like to reiterate the City's position regarding the concept of "fair-share funding," as we requested in our original comments on the DEIR, in a letter dated, December 12, 2017, to your office. The City believes that fair-share funding should

Mr. David Rader
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apply to any intersection under the jurisdiction of our City. I have enclosed a copy of that letter for your reference.

Intersection No. 89/ Close Castro Street

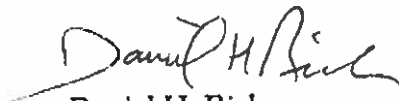
Pages 2-188, 2-228, 2-391, and 2-431 of the DEIR still indicate that "...if Castro Street is independently closed by the City of Mountain View, Stanford would not need to contribute funding to any improvements at this intersection." We would request that Stanford University make a fair-share funding allocation at that intersection, whether or not Castro Street is independently closed by the City of Mountain View. Again, the City believes that the concept of fair-share funding should apply to any intersection in our City. These comments made previously on December 12, 2017, have not yet been addressed and, therefore, still apply.

Marguerite Shuttles

The City is working on a number of initiatives to reduce single-occupancy vehicles and supports as robust a Marguerite shuttle system as possible. It is not clear in the DEIR if there will be an increase in the number or service in the Marguerite Shuttles as a result of the project, or either alternatives.

Please send a copy of the Response to Comments for the DEIR to our Planning Division. If you have any questions, please contact me at (650) 903-6301, or my staff via e-mail at jeff.roche@mountainview.gov. Thank you for your time and consideration.

Sincerely,



Daniel H. Rich
City Manager

DHR/7/MGR
614-07-17-18L

Enclosure

cc: City Council

SCE—Cervantes, PP, SP—Roche